

Ron:

Here are my preliminary comments on the first two sections of the EWA paper. I will provide more comments later. I will try not to repeat all the same comments which Jim White, Pete Chadwick, and Karl Halupka have sent you, but I have read their comments and all three of them are right on target. Consider my first comment to be a "ditto" of what you have received from them.

General Comments

1. The general conclusions provided on page 1 could probably be deleted, and there would be no great loss for this EWA implementation paper. The issue listed under specific conclusions are sharper and in my view more appropriate. You could start with a short paragraph or two on Methods (we played games with various assets, and evaluated the assets in terms of their flexibility, effectiveness, efficiency, and overall sufficiency). However, since you may be reluctant to do so, specific comments on each are provided below.

Specific Comments

Bullet 1: What is meant by "funds that can be used to purchase other environmental benefits"? If it means what I think it means, delete it.

Bullet 2: These features are part of CALFED, and they would play a role in EWA effectiveness and utility, but I think it would be safer to say we're assuming they are in place. To date, we haven't done a real sensitivity analysis on key features. I'd recommend generalizing to say that "Improvements in water conveyance and storage" add flexibility and options to the way an account is operated". It also may add a burden; we've seen how hard it is for EWA to cut exports from 15,000 cfs.

Bullet 3: Useful for what? You should be very explicit here. It was useful based on our assumptions that fish were not present, efficiently screened, and that EWA got a share of the water.

Bullet 4: Funds may continue to be essential in later stages as well. We assume they become less important if other means to build the account come online.

Bullet 6: I'd hesitate to admit this. I think the further refinement of the EWA, fish and water user goals, and appropriate assets are necessary before we draw conclusions. However, I'm an eternal optimist.

Bullet 7. I think there's considerable disagreement, yes. We have not defined the disagreements, we've laid out hypotheses to be tested. The disagreements will certainly not be resolved in the next few months.

B. Specific Conclusions

Bullet B1. This conclusion overstate benefits. As you've heard from DFG and NMFS, replace would with "could" or "with the appropriate assets, has the potential to". Also remove "significant".

Bullet B2. I can't disagree with this statement. However, the merits of this statement are questionable from a fish standpoint. Overall are we protecting fish better than, or nearly as well as with standards? For some fish, yes. Suggest: "The EWA has the potential to allow more eports while providing similar fish protections"

PROBLEMS/ISSUES/CONSTRAINTS

General

1. Start here with a general discussion of meeting fishery goals with an EWA. We need to make the account large enough, real enough, and implementable to protect fish.

Specific

Add a new bullet 1 stating that gaming showed the most promise for smelt adults and SJ salmon, but considerable more (or better used) assets may be needed to meet goals for other fish.

Bullet 1. The EWA actions did not cause a shortage. They would have been short in most of the baseline runs. Also: define explicitly the water user goals—not everyone knows what they are, and people should be able to judge what baseline they're short on.

Bullet 6. This is a bit too strongly worded. We should simply state that there would be an impact on transfers, or that transfers would impact the account, and we need to work on this aspect.