

17	4.3	76	4 th para	JRW/DFG	If the EWA is to be part of an approach to obtaining ESA/CESA assurances, its objectives should not be complicated by adding the objective of achieving water quality improvements? Some export water quality advantages accrue from actions to reduce fish impacts (e.g. pumping less water during the peak in TOC concentration in the Delta in February and March) but these should be described as incidental benefits, not a directed purpose of the EWA.	
18	4.3	76	same	JRW/DFG	Study and potential implementation of the Hood diversion will not improve water quality.	
19	4.3	77	1 st full para	JRW/DFG	The third sentence indicates dramatic entrainment reductions are achievable with "low reduction in diversion levels". While any export reduction will result in lower entrainment, dramatic reductions often require substantial reductions in export pumping rate and for more than "small periods of time". The point of this paragraph should be to emphasize that real time monitoring will be necessary to maximize the timeliness of EWA actions by anticipating periods of high risk to fish. The magnitude of operations changes and of the fish savings should be discussed elsewhere.	✓
20	4.3	80	3 rd para, last sentence.	JRW/DFG	Again this strongly indicates it is an EWA obligation to "provide water quality improvements for all users". Is this true? EWA was	Ⓟ

21	4.3	80	last para.	JRW/DFG	What is meant by "address potential impacts to other beneficial uses"? Which uses? What impacts?
22	4.3	81	item 8, last sentence	JRW/DFG	This statement is loaded with modifiers, (properly sized, adequate, necessary, reliable) all of which have to be defined before we know what we've got. It also fails to mention that prescriptive standards will be part of the picture, and the scope of these is not known.
23	4.3	81	6 th para	JRW/DFG	Concern about the representativeness of the five year sequence used have been raised. Few if any believe we have discovered all there is to know using these five years. "No foresight" during gaming is a hard claim to make after three or four games with the same hydrology and fish data.
24	4.3	81	7 th para	JRW/DFG	EWA had control over minimal "high priority" storage rights; control over "low priority" storage rights means no control. Suggest last sentence be modified to read: Finally it had an income of \$30-\$40 million per year for water purchase and willing sellers were always found.

25	4.3	82	1 st para	JRW/DFG	The four scenarios did NOT have the same baseline. In every case, many assumptions were varied, including the capacity and configuration of storage and conveyance facilities and who controlled their use. Water quality was added as a concern and water users were given \$ to use to achieve WQ improvements as they chose.	
25	4.3	82	2 nd para	JRW/DFG	I recall nothing about EWA monetary assets earning interest or paying interest on loans. This is fiction.	
26	4.3	83	1 st para	JRW/DFG	This paragraph should point out that the SWRCB must approve joint point of diversion and that the CALFED agencies have proposed that such approval be subject to an operations plan developed by CALFED and accepted by the SWRCB .	
27	4.3	84	last para	JRW/DFG	It should be pointed out that variation in application of some standards was necessary to get the EWA through without defaulting on debts. These variations had adverse consequences for some fish species in the Delta. It is an open question whether there will be games with variances in all of these factors.	