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Copies Ron Ott/CBDA

From Doug Lovell/Federation of Fly Fishers  
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Bob Strickland/United Anglers of Northern California

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Subject Comments Regarding Proposed Studies of the Population Level Effects of Delta Water Diversions

We endorse Mr. Miller's proposal to embark on a study to assess the population level effects on Delta fish species resulting from water diversions at the Banks and Tracy pumping plants. Unfortunately we are not able to endorse the limited scope that he has proposed, but this should not detract from the overall purpose.

First, the existing methodology for estimating fish mortality from the pumps is outdated and simplistic. The CBDA consensus forum process, in combination with the CBDA emphasis on science, is an excellent venue to update our accounting for the effects of the two pumping plants.

Second, the existing methodology does not translate directly to mitigation obligations due, in part, to our outdated mortality accounting system. There needs to be an accepted rationale to assign mitigation obligations to the beneficiaries of the exported water so the true cost of the water can be determined and the beneficiaries can bear their obligations.

Third, the re-establishment of historic, abundant fish populations is a founding goal of our process. By focusing on population levels effects we can focus on population level mitigation, restoration, and enhancement.

It is apparent that, if no water diversions existed, the population level impacts would be zero and if all inflow was diverted, the populations would be extinct. We are somewhere in between and let us properly account for our effects.

That said, asking the correct question(s) is paramount. So this forum needs to focus on the question issue and let science determine the outcome. We need to focus on existing, anticipated future, and cumulative impacts. We need to incorporate measured take, egg and subadult entrainment, near and far field predation, water quality (the entire ecological suite as opposed to just salinity), foodweb production, migratory disruption, and invasive species propagation attributable to the pumps. Otherwise, we will not truly assess population levels effects and invalidate our original premise.

We believe it is essential to utilize the best scientific methodology to establish the best viable population impact analysis as this will provide decision-making information critical to building the consensus the forum desires as a result of our mutually-expressed goals.