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COMMENTS ON THE STREAM SCIENTIST'S DRAFT REPORT ON THE SYNTHESIS OF INSTREAM FLOW RECOMMENDATIONS FOR MONO BASIN STREAMS SUBMITTED TO THE STATE WATER RESOURCES CONTROL BOARD

Thank you for the opportunity to review and comment on the Stream Scientist's Draft Synthesis Report regarding instream flow recommendations for Mono Basin Streams that are diverted by the City of Los Angeles (LADWP).

I would like to congratulate the Stream Scientists and their colleagues for their ongoing efforts in implementing the monitoring program over the years. The Stream Scientists are to be applauded for the content and the analysis in the Draft Synthesis Report which is based on results of that monitoring effort.

The focus of my comments concern the necessity of a timely and well thought out Adaptive Management Program. A good working definition for adaptive management is the following:

"Adaptive management is a systematic process for continually improving management policies and practices by learning from the outcomes of operational programs" (British Columbia Ministry of Forestry).

The ecological processes of the Mono Basin streams diverted by LADWP are both dynamic and complex and the Draft Synthesis Report makes that point. As a result, our understanding of these stream ecosystems and our ability to predict how they will respond to management actions is evolving. Based on that uncertainty, the Stream Scientists recommended the application of an Adaptive Management Program for making future stream resource management decisions.

Adaptive management is indeed a way of dealing with uncertainty when using a scientific approach to decision making. In the case of the Mono Basin streams the causes of uncertainty include but are not limited to:

- Public Trust Values
- Ecological Knowledge Gaps
- Competing Resource Interests
- Future Economic Costs

Rather than using existing knowledge and selecting a single "best" set of final conditions….. the Stream Scientists have recommended to use an adaptive management approach in implementing any new Stream Ecological Flows (SEF). I strongly support that recommendation and I

encourage the State Water Board to require that approach in any subsequent order. The Mono Basin Adaptive Management Program should be completed prior to the implementation of State Water Board ordered SEFs.

The Mono Basin Adaptive Management Program must be collaborative in developing the various management alternatives that could be applied based on the monitoring of the initially required SEFs. For a Mono Basin Adaptive Management Program to be efficient and successful there must be a process by which adaptive management alternatives are developed and applied. In using adaptive management the State Water Board should explicitly recognize the existence of uncertainty and require the implementation of conservative initial SEFs that favor resource protection. Under the direction of State Water Board staff and the Stream Scientists, the process for developing the Mono Basin Adaptive Management Program must have structure. A process should include but not be limited to the following elements:

- Establish a clear and common purpose. All parties must commit to participation and cooperation in the development of good faith management prescriptions
- The process must be subject to an open debate in a multi-stakeholder process in which trade-offs and risks (biological and financial risks) are explored and discussed.
- The goal of the participants should be the development of predefined resource objectives and measures of performance prior to implementation of any SEFs. This would also include to the extent possible predetermined alternative management prescriptions.
- There should be a predetermined decision making process to choose the preferred management prescription(s) and the concomitant monitoring program to measure the outcomes of the management prescription(s). A predetermined decision making process is critical when deciding on changes in management prescription(s) and the necessary monitoring effort which will almost certainly involve trade-offs.
- The selected adaptive management action must be justified on the basis of costs and benefits relative to other possible adaptive management prescriptions.
- There should be good record keeping of the decisions made by the participants.
- The process could include peer review of the results of the monitoring program and recommendations for any future management prescription.

I urge that State Water Board to consider the above points when developing an adaptive management program for the restoration of the Mono Basin streams.

Finally, it should not be forgotten that the Mono Lake Decision was not only based on the requirement for restoration of stream conditions that benefited the fishery but also included conditions to protect other public trust resources. In selecting the appropriate SEFs, the decision must be made in light of the other requirements of the Mono Lake Decision to protect public trust resources.

Thank you for the opportunity to provide these thoughts regarding the application of an adaptive management program as part of the Mono Basin stream restoration efforts.

Sincerely,

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