Inland Desert Region (IDR)
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The Department is pleased to receive and review the document "Synthesis of Instream Flow Recommendations to the State Water Resources Control Board and the Los Angeles Department of Water and Power, Draft Report for Public Review (Synthesis Report). The Synthesis Report is aptly named in that it attempts to integrate a growing body of insights from a variety of disciplines which have been brought to bear on the Mono Basin restoration during the past 16 years. The work constitutes a quantum step forward in analytical sophistication and advances the restoration of the diverted tributaries of Mono Lake. We appreciate the efforts of the Stream Scientists, and are pleased many of our recommendations, such as stream temperature modeling, were incorporated in their assessment of fish needs and management outcomes. We also appreciate the efforts of the California State Water Resources Control Board staff and the Los Angeles Department of Water and Power in facilitating and encouraging these efforts to date. Such a large undertaking merits and deserves extensive critical analysis. We commend to you the Mono Lake Committee's detailed commentary as a thorough critique which captures the sweep of pertinent technical issues arising from the Synthesis Report. Their concerns and recommendations merit comprehensive scrutiny and consideration. In addition, we offer the following comments:

1. The Department is receptive to potential specific proposals for temporary experimental evaluation of many of the recommendations of the Synthesis Report, provided adequate monitoring and evaluation is assured.
2. The Synthesis document needs and deserves extensive editorial revision to transform its arguments into intelligible, unambiguous language accessible a broader audience than the Stream Scientist's themselves. Confusing wording, incompletely expressed arguments, and a general lack of topical and conclusory sentences render the current draft semi-opaque--even to a technically adept reader familiar with most of the issues. As written, too much of the content invites individual interpretation. We strongly recommend enlisting the services of a technical writer who is unfamiliar with Mono basin and fishery issues to overhaul the writing, disinter the substantial technical content, and render a worthy final report.

3. A fundamental goal of the restoration is and should remain restoration of the conditions which benefited the pre-1941 fishery. The incorporation of ecosystem health objectives is compatible and arguably essential to the fishery restoration. However--in the complex environmental, historical, and institutional context of the Mono Lake basin--ecosystem arguments should inform the technical approach, not morph into substitute goals.
4. Attainment of an appropriate restoration endpoint will continue to require monitoring and adaptive management for the foreseeable future. Two essential elements of adaptive management are: measured progress toward an explicit objective, and commitment to adjust management action(s) in response to measured feedback. We suggest that the appropriate objectives are the termination criteria. These should absolutely be continued, although it may be appropriate to substitute well considered criteria, or revise the monitoring frequency of some measures. In particular, we continue our recommendation to use the concept of proportional stock density (PSD) as an critical measure of trout population status. Any changes to the termination criteria should be predicated on improving their utility to detect objective attainment.
5. We would like to discourage re-interpretation of the hearing record with regard to fishery quality and historical trout body size. The evidence for Rush Creek in particular robustly supports the conclusion that "large" trout were considerably more prevalent in the pre-diversion period than they are now. The expert opinion of Mr. Elden Vestal, Department of Fish and Game (retired) stands. We sympathize with today's researcher's discomfort that parallel population and size structure data are not available for statistical comparison with contemporary data. However, this condition is common to virtually any fishery investigation taking place over all but the shortest time interval. Population estimates today are made with methods and techniques such as electrofishing which were not in use 69 years ago. Brown trout densities and size structures reflect a state of habitat in which large body size and piscivory are effective life history strategies. We recommend monitoring proportional stock density (above). A significant and change in PSD will reflect attainment of the desired habitat state, even though we cannot *a priori* know the precise PSD response, nor entirely prescribe the threshold causal habitat state.
6. Finally, we applaud the stream scientists for their recognition of the significance of Grant Lake to the limnology and trout habitat of Rush Creek. Management for higher summer levels in Grant Lake will not only benefit the downstream portion of Rush Creek, it will concomitantly protect the Grant Lake fishery and its benefits to the economy of Mono County. We recognize the difficultly of attaining storage objectives in drier years, and support the recommended management approaches as a sensible compromise between what would be optimal and what is attainable.

We would like to again express our appreciation for the opportunity to review the Synthesis Report, and for the cumulative efforts of all who participated in its development. Mono basin restoration has benefited from collaborative and collegial interactions among the concerned parties. The synthesis report in many respects has been

helped and informed through past and ongoing collaboration. As the State Board and staff move toward fulfilling their obligations in the attention to Mono basin matters, we hope every opportunity will be made to encourage, induce, and capitalize on continued collaboration, even when that approach may not seem expeditious given the press of time and deadlines.

Sincerely,

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