This message provides comments in response to the Call for Input on the charge questions for the *Peer Review of New Lines of Evidence for Effects on Fish from the Long-Term Operations (LTO) of the Central Valley Project (CVP) and State Water Project* (collectively referred to in these comments as LTO).

It is encouraging that the charge questions and review appear to be informed by the National Academies' of Sciences recommendations for OMR flow management (NASEM 2026). The NAS recommendations listed below provide useful context for the charge questions, consideration of refinements to the charge questions, and for independent reviewers to consider as they conduct their work.

Recommendation 3-1: The underlying scientific bases of the thresholds and corresponding export reductions used in OMR flow management should be made available so that their use can be appropriately reviewed.

Recommendation 3-3: To move OMR flow management beyond the use of salvage as a proxy for impacts on fish in the Delta, the monitoring and modeling in support of the action should evolve to address the following four questions: (1) What is the zone (or sphere) of influence of operations? (2) What proportion of any given fish population is under that influence? (3) What is the impact to fishes in these regions? (4) What are the consequences of these impacts at the full population level? Several recommendations stem from adherence to this strategy.

Recommendation 3-4: Improvements in Delta channels, forebays, infrastructure, and operations might help to reduce Delta-wide native fish losses and should be studied for their potential to reduce the ecological impacts of pumping.

Recommendation 3-5: The OMR Flow Management Action should evolve to better anticipate changing climate impact drivers.

Please consider the additional suggestions below in addition to the NAS recommendations identified above.

Input on scope clarification for the charge questions

- The objective of the peer review is stated broadly to include recommendations to improve methods for evaluating fish and aquatic effects of LTO. The charge questions are specifically about listed species and LTO exports in the Delta which are a portion of LTO and a portion of fish species and aquatic life impacted by LTO. Consider modifying the objective statement to reflect the narrower scope of the review which appears to be LTO exports in the Delta and associated impacts to listed fish species.

- Include a definition of "CVP and SWP [water] operations" and variant terms within the scope of the review. For example, identify the facilities included, such as export operations at Jones and Banks pumping plants, Delta Cross Channel (DCC) gate operations, Bioacoustics fish fence (BAFF) operations, Suisun Marsh Salinity Control Gate (SMSCG) operations, monitoring, and/or habitat restoration.

Input on charge questions

- Adjust review questions to include assessment of whether study methods and data analyses in the Review Documents (New Lines of Evidence) apply scientifically credible and reproducible methods and are designed to assess the strength of relationships between hydrologic and hydraulic parameters and fish population responses.
- Adjust review questions to include assessment of whether findings and conclusions in the Review Documents (Lines of Evidence) are supported by analytical evidence in the Review Document and by best available scientific evidence in the subject area.
- Adjust review questions to identify specific life-stages of fish, specifically pre-smolts for salmonids and larval smelt, when evaluating the Delta water export operation impacts.
- Define the "weight of evidence" approach to incorporate scientific methods such as those described in Weed (2005)[1] and EFSA Scientific Committee et al. (2018)[2].
    - [1] Weed, D. L. 2005. Weight of evidence: a review of concept and methods. Risk Analysis 25(6):1545-1557. https://doi.org/10.1111/j.1539-6924.2005.00699.x.
    - [2] EFSA Scientific Committee, A. Hardy, and others. 2017. Guidance on the use of the weight of evidence approach in scientific assessments. EFSA Journal 15(8):4971. https://doi.org/10.2903%2Fj.efsa.2017.4971.
- Ensure that all Review Documents (Lines of Evidence) and Supplemental Materials and cited references are publicly available. Identify which Review Documents and Supplemental Materials have been through an academic peer review, similar to peer review required for academic journal publication, and which studies have not had an academic scientific peer review.

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[1] Weed, D. L. 2005. Weight of evidence: a review of concept and methods. Risk Analysis 25(6):1545-1557. https://doi.org/10.1111/j.1539-6924.2005.00699.x.

[2] EFSA Scientific Committee, A. Hardy, and others. 2017. Guidance on the use of the weight of evidence approach in scientific assessments. EFSA Journal 15(8):4971. https://doi.org/10.2903%2Fj.efsa.2017.4971.