



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
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Valerie Holcomb, Public Information Officer
Stein Buer, Program Manager
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

To Ms. Holcomb and Mr. Buer:

Subject: Comments on *Developing a Draft Preferred Program Alternative*

Thank you for the opportunity to comment on, *Developing a Draft Preferred Program Alternative*. The document provides a good overview of how staged implementation and predefined conditions and linkages for progressing between stages can be used to develop a draft preferred alternative. We support the emphasis placed on adaptive management.

Please consider the following suggestions when preparing the next version of the document. Our comments pertain to content, not editorial comments. These refer primarily to adaptive management and to the isolated facility. We look forward to discussing these comments with you and to see changes in the next version of the document. Please contact intern, Judi Tamasi, at (415) 427-1477 if you have any questions.

Section 1-Framework

Introduction, p. 1 and Background, p. 2. The first paragraph (in the Introduction) refers to "the six common program elements, storage and conveyance, ..." Page 2 (in the Background) refers to "eight integrated program elements". We suggest that this wording be consistent in these two sections. We suggest you explain that there are six common program elements, and that storage and conveyance are separate elements which may not be part of the selected alternative.

Levee System Integrity, p. 4. In the paragraph which starts with "The outcome of and specific sites for Stage 1 decisions...", we suggest that you change the wording from "including need for mitigation" to "including needs for mitigation". We believe that the issue is not whether there will be a need for mitigation, but that there are needs for mitigation. Therefore, we propose that the discussion be based on which mitigation measures are needed.

Staged Implementation and Staged Decision Making, p. 5. In the first paragraph under this heading, it is stated that "Adaptive management is an iterative process that involves..."

(four elements are then listed). We would like you to specify who is in charge of this and what guidelines have been established for CALFED.

Staged Implementation and Staged Decision Making, p. 5. The first sentence in the second paragraph under this heading reads, "Central features of adaptive management are staged implementation and staged decision making." We suggest that you add wording that states that this staged implementation and decision making are based on feedback and scientific information.

Contingent Strategy, p. 7. Under this bullet we suggest that you state that all reasonable conservation efforts would be made and evaluated before implementing the contingent strategy.

Conveyance, p. 9. It is stated that, "A combination of public health and fishery recovery factors could also trigger the decision for the isolated facility. These triggers are not time dependent..." We suggest that you clarify limits of these triggers and/or give examples of triggers. More specifically, clarify that analysis of impacts of the dual-conveyance facility on the fish would be required, because projected impacts on fisheries do not appear to be widely established.

Conveyance, p. 9. Under Item 2.a., it appears that new storage would be built if the isolated facility is built. Please clarify if new surface storage and isolated facility are independent elements or joined.

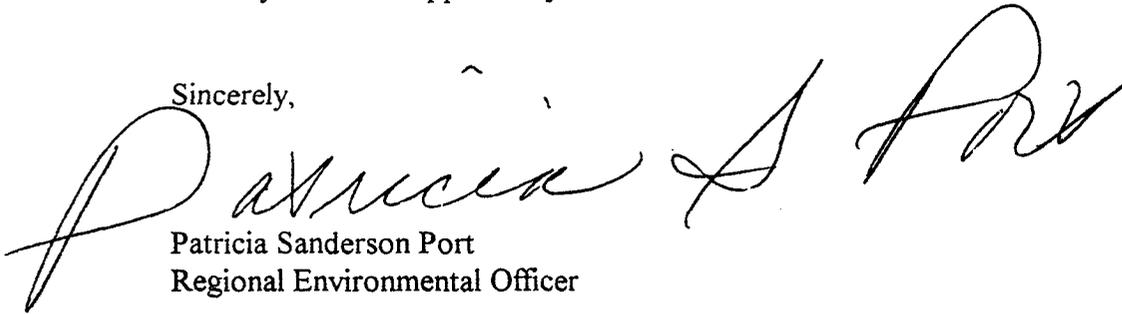
Section 3-Stage 1 Implementation

Levees, p. 21. In the text under this heading, please clarify where/how the U.S. Army Corps of Engineers fits in as a source and recipient of CALFED funding.

Watershed Program, p. 25. Under Item 2, it states "Provide watershed stewardship funds to local watershed groups." We suggest that during this process of providing money, you coordinate with watershed groups, acquire information about their existing watershed plans, and analyze if these existing plans can be incorporated into the CALFED process.

Thank you for the opportunity to comment.

Sincerely,

A large, handwritten signature in black ink, appearing to read "Patricia Sanderson Port". The signature is written in a cursive style with a large initial "P".

Patricia Sanderson Port
Regional Environmental Officer