

The Bay Institute *of San Francisco*

"Restoring The Bay's ecosystem ... from the Sierra to the sea."

July 24, 1998

Lester A. Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street #1155
Sacramento, Ca. 95814

RE: STAGED IMPLEMENTATION/PHASED DECISION MAKING

Dear Mr. Snow,

This letter is submitted as the preliminary comments of The Bay Institute of San Francisco on the July 8, 1998, draft "Developing a Draft Preferred Program Alternative." Our primary focus in these comments is the nature of the decision making process, and clarification of what elements are necessary for inclusion in the final Programmatic Environmental Impact Statement/Report (PEIS/R) and other decision documents. We will provide more detailed comments on specific Stage 1 implementation actions, linkages and conditions separately. In summary, we recommend:

1. That the transition to a staged implementation/phased decision making approach by the CALFED Bay-Delta Program be continued, but that the definitions of these concepts be refined.
2. That different decision pathways and documentation be used for staged implementation elements and phased decision making elements.
3. That the Program complete all technical analyses which support its baseline findings prior to a final decision.
4. That adaptive management be defined in detail for all program areas prior to a final decision.

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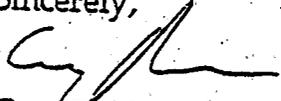
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P. A1: We are confused by the assertion that the Conservation Strategy is final for ESA. We view the Strategy as an ESA guidance document which is only final for those elements fully analyzed in the final PEIS/R. Subsequent project-level documentation and/or incidental take authorization is necessary for some staged implementation elements, and for all phased decision making elements.

Thank you for your consideration of our views on staged implementation. Please call me at (415) 721-7680 if you or your staff have any questions.

Sincerely,



Gary Bobker
Senior Policy Analyst