

Letter to Mr. Lester Snow, Director, CALFED, dated March 17, 1998

**Enclosure 3: Discussion of Strategy for Screening Program Alternatives Utilizing Criteria Properly Categorized as Cost, Logistical, or Technological Constraints on Practicability**

USACE has previously communicated concerns to CALFED over the applicability of four of the eighteen "distinguishing characteristics" being used as screening criteria to move toward alternative selection. These four criteria are changes in land use; assurances difficulty; consistency with the solution principles [of the CALFED Program]; and socio-economic impacts.

There is a remote possibility that these criteria may successfully be characterized as being logistical in nature, due to the extra-ordinary nature and scope of the program. However, as of this date, a rationale to support this position has not been provided to us from CALFED. And, ultimately, such a rationale may not be defensible. This would only be a problem if one (or more) of the four questionable screening criteria is determinative in limiting the range of alternatives from which the final alternative would be selected at the end of Phase II.

Our recommendation is that, once the selection process is complete, the alternatives should be re-screened using only the fourteen screening characteristics that we have previously identified as being appropriate under the §404(b)(1) Guidelines. While various alternatives may be ranked differently, ideally the selected alternative will be the same at the end of this modified process.

However, regardless of the appropriateness of the screening criteria used in this process, the selected alternative will still have to comply with the §404(b)(1) Guidelines, as discussed in Enclosure 2 to the cover letter over this document.