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UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
Southwest Region  
501 West Ocean Boulevard, Suite 4200  
Long Beach, California 90802-4213

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ENTRIX, INC.  
(FRONT DESK)

Ms. Ramona Swenson, Ph.D.  
Entrix, Inc.  
590 Ygnacio Valley Road, Suite 210  
Walnut Creek, California 94596

Dear Dr. Swenson:

Thank you for the opportunity to review and comment on the draft *Santa Ynez River Management Alternatives* (plan). Although the plan involves a river system located in the Southern California Evolutionarily Significant Unit for the federally endangered steelhead (*Oncorhynchus mykiss*), comments provided in this letter are unrelated to endangered species issues. Consequently, this letter does not take the place of consultation under section 7 of the Endangered Species Act of 1973, as amended.

We recognize the plan is in the early development stage. Accordingly, we provide only general comments and identify those alternatives we recommend not be considered further.

**General Comments**

Is the terminology "management" used in the title of the plan accurate? The plan presents what we interpret as conceptual enhancement or restoration alternatives to accomplish some objective, not what we would characterize as "management" alternatives.

Section 1.2, Management Objectives, does not present a clear, measurable management objective for Santa Ynez River steelhead or any other species. We believe a specific management objective should be defined for the purposes of guiding the alternative identification process and focusing judicious use of the alternatives for accomplishing the management objective.

It may be appropriate to blend some alternatives with other broader alternatives. For example, alternatives 6 and 7 could be included in alternative 5, since 6 and 7 appear as options to facilitate alternative 5.

The plan does not appear to provide any commitment. Who would be responsible for implementing these alternatives? Who is the funding source? Who would monitor and maintain performance of the alternatives?



CCRB/ID #1-250


## Alternatives Recommended for Omission

For reasons we describe below, we recommend that the following alternatives not be considered further:

Alternative	Description
2	Alternate release points along mainstem
8	Recirculate flows in mainstem
15	Passage channel at lagoon
16	Fish ladder at Bradbury Dam
17	Hilton Creek as fish ladder
18	Trap and truck adults from mainstem to above Bradbury
19	Trap and truck adults from mainstem to outside watershed
20	Remove warmwater fish below Bradbury Dam
21	Wild steelhead hatchery
22	Use upstream broodstock for supplementation
23	Streamside incubators in mainstem
27	Continuous pump/recycle flows in tributaries
28	Groundwater wells to augment tributary flows
35	Trap and truck adults to tributaries downstream of dam
36	Trap and truck outmigrants at tributaries
39	Trap and truck adults from mainstem below dam to mainstem above Lake Cachuma
40	Trap and truck downstream migrants from the mainstem above Lake Cachuma
41	Remove warmwater fish from mainstem above Lake Cachuma
42	Remove warmwater fish in Lake Cachuma
43	Remove warmwater fish in Gibraltar Reservoir
44	Remove warmwater fish in Jameson Lake
45	Trap and truck adults from mainstem below dam to tributaries above dam
46	Trap and truck outmigrants at tributaries
47	Remove warmwater fish from tributaries above Lake Cachuma
48	Supplemental rearing facilities on tributaries

Generally, we recommend omission of these alternatives because many would require inordinate human intervention and technical complexity, and therefore human or mechanical error seems inevitable. Some alternatives would likely provide only temporary biological benefits. The technical feasibility of these alternatives for alleviating limiting factors has not been evaluated. Some of these alternatives are not appropriate surrogates for the natural environment. Simpler alternatives are available. We hope this information assists you in the development of the plan, and look forward to reviewing future drafts. Please contact Mr. Anthony Spina at (562) 980-4045 if you would like additional information.

Sincerely,

*for*   
 William T. Hogarth, Ph. D.  
 Acting Regional Administrator