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Via Email bcnelson@usbr.gov
and First Class Mail

Ben Nelson
Bay-Delta Office
U.S. Bureau of Reclamation
801 I Street, Suite 140
Sacramento, Ca 95814-2536

Re: Draft Environmental Impact Statement for the
Coordinated Long-Term Operation of the Central Valley Project
and State Water Project

Dear Mr. Nelson:

Please accept these comments on the Draft Environmental Impact Statement for the Coordinated Long-Term Operation of the Central Valley Project and State Water Project ("DEIS").

I have lived, worked, and recreated in the Delta region for my entire life. My family settled in the Central Valley in the 1800's. I have a special attachment to the Delta as a place. The lands and waterways within the Delta are dedicated to a multitude of uses, including agricultural, residential, recreational, environmental, and various commercial uses. The Delta is a home to over a half million people, with an annual economic output in excess of \$26 billion per year as of 2008, and a multitude of species.

I am uniquely qualified to comment on the DEIS, since I have witnessed the Delta suffer the consequences of excessive state and federal project diversions and exports from the Delta, which are increased due to the coordinated operations of the state and federal projects. I recall when the Delta was a much healthier place when I was a child, in the 1950's.

1. The Alternatives Should Include Independent Project Operation Without Coordinated Operations.

The most obvious alternative, operation of the projects without coordination, appears to have been overlooked or avoided. Operations without coordination would provide the only real alternative which could avoid the application of the biological opinions. The DEIS should have analyzed the separate operations of the projects without any coordination, and analyzed those operations as against the need for coordinated operations under the requirements imposed by the biological opinions. In particular, increased instream flows in the Delta in the absence of coordinated operations should be analyzed.

2. Failure to evaluate the project and all alternatives for consistency and compliance with the CVPIA.

The CVPIA provides a clear mandate in section 3406(b) to the Bureau to conform its operations with all obligations under state and federal laws in effect at the time of enactment in 1992. That section also includes the fish doubling goal.

The DEIS should include an analysis of how operations will achieve and enable compliance with the CVPIA, including but not limited to the doubling goals for all anadromous fish as specifically defined by the CVPIA to include Striped Bass and American Shad. The Anadromous Fish Restoration Program established a doubling goal for Striped Bass of 2,500,000 fish. The deadline for achieving that has long passed, yet Striped Bass are in catastrophic decline. The DEIS fails to mention any meaningful efforts being made to achieve the doubling goal, despite being 14 years overdue. The DEIS should evaluate the project and the alternatives for consistency and compliance with all CVPIA obligations, and all CVPIA objectives and goals.

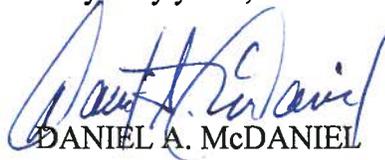
3. Failure to Determine, Consider, Evaluate, and Mitigate Predation on Striped Bass.

As Striped Bass are an important sport fishing asset entitled to special attention and protection under the CVPIA, predation on Striped Bass by other species should be analyzed considered, evaluated and mitigated against. The DEIS notes the importance to Striped Bass of the salinity gradient and predation upon other species, but fails to consider predation upon Striped Bass by mammals, birds, and other fish. Further, the DEIS fails to analyze and to consider mitigation of salinity impacts on Striped Bass.

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Thank you for the opportunity to comment on the DEIS. We look forward to the receipt of a revised DEIS.

Very truly yours,



DANIEL A. McDANIEL