From: Obegi, Doug <dobegi@nrdc.org>
Sent: Tuesday, June 4, 2019 4:23 PM

To: Barry Thom - NOAA Federal (barry.thom@noaa.gov)

Cc: Maria Rea (maria.rea@noaa.gov); Howard Brown - NOAA Federal; Poole, Kate; BJ

Chisholm (bchisholm@altshulerberzon.com); Corrinne Johnson

Subject: Comments on biological assessment for reinitiation of consultation

Attachments: NRDC letter to NMFS re ROC 6-4-19.pdf

Dear Barry,

The attached letter provides details our concerns with the proposed action and the analyses presented in the Bureau of Reclamation's biological assessment for the reinitiation of consultation on operations of the CVP and SWP. Due to file size limitations on our email system, I will follow up with 5 emails to Maria and Howard with the enclosures to this letter, which include a number of scientific studies, reports, presentations, emails, RPA amendments, and other supporting documentation that should be considered in this consultation. Several of the documents referenced in our comment letter, such as NMFS' WaterFix biological opinion, were too large to email and are hereby incorporated by reference and should be included in the administrative record for this matter.

In addition, this morning the Bureau of Reclamation provided us with access to NMFS' draft effects analysis for its forthcoming biological opinion. We greatly appreciate the federal government ensuring that all stakeholders have access to these public documents, and we will endeavor to provide additional comments to NMFS in the coming weeks.

Please feel free to contact me at your convenience if you have any questions regarding our letter or would like to discuss this further.

Sincerely, Doug

Doug obegi Senior Attorney* Water Program

NATURAL RESOURCES DEFENSE COUNCIL

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^{*} Admitted to practice in California