

Preliminary Draft

Is the Draft BDCP EIR/EIS based on science good enough for a project so large, complex, expensive, long-lasting, and important?

We find that the EIR/EIS falls short of meeting even a “good enough” scientific standard. Many of the impact assessments hinge on optimism about the feasibility, effectiveness, and timing of the proposed actions, especially habitat restorations. The project outcomes are clouded by uncertainties that are reported or propagated incompletely, and are founded on assumptions that are difficult to identify. Linkages and interactions among species, landscapes, and waterways receive little analysis, as do interactions among the proposed actions themselves. The analyses mostly neglect Delta levees, San Francisco Bay, and San Joaquin Valley agriculture as resources the project would affect. The outcomes are further clouded by underestimated effects of climate change. Contingencies and action alternatives await risk-based decision analysis. The nascent design of an adaptive management team excludes contingency plans and neglects problems that adaptive management may be unable to solve. The presentation impedes decision-making.

This cover memo expands on these concerns and introduces two appendices. One appendix responds to questions from the Delta Stewardship Council; the other evaluates many of the resource chapters in the EIR/EIS. The memo also states our concurrence with many of the points recently raised in a review of the BDCP Effects Analysis, and it suggests ways of improving science in the BDCP and in the EIR/EIS. Together, these appraisals make up our legislatively mandated review of BDCP documents.