

THE DELTA SCIENCE PROGRAM INDEPENDENT REVIEW PANEL REPORT ON THE BDCP EFFECTS ANALYSIS, PHASE 3

In March 2014 the Delta Science Program released the final report of Phase 3 of an Independent Review Panel review of Chapter 5 of the public draft of the BDCP Plan, dealing with the analysis of potential ecosystem effects of BDCP actions. This review was released after the Delta Independent Science Board (DISB) had completed an interim draft of our findings. The Independent Review Panel's review was narrower and deeper than that of the DISB, dealing with a single (lengthy) chapter rather than the entire BDCP Draft EIR/EIS and relevant parts of the BDCP Plan documents.

We have reviewed the report of the Independent Review Panel and concur with their findings. Here, we note several important areas of agreement in the reviews. In particular, the reviewed documents:

- Do not adequately assess the sources and effects of uncertainties ;
- Do not include clear statements of critical assumptions underlying many of the proposed actions and their consequences;
- Characterize adaptive management as the default solution to unresolved issues and uncertainties, without a clear description of how adaptive management will actually be implemented or how it is tied to monitoring;
- Fail to recognize that habitat restoration is a lengthy process with uncertain results and timing
- Present modeling results without thorough sensitivity analyses or consideration of a range of possible scenarios;
- Partition the Delta into separate pieces (e.g., covered species) without also considering broader spatial and temporal dynamics of the Delta as a system; and
- Present a massive amount of detailed information in a poorly organized and unsynthesized fashion with no clear and concise summaries, making it difficult to evaluate and compare the consequences of proposed BDCP implementation alternatives.