

Review Comments

Bay Delta Conservation Plan EIR/S

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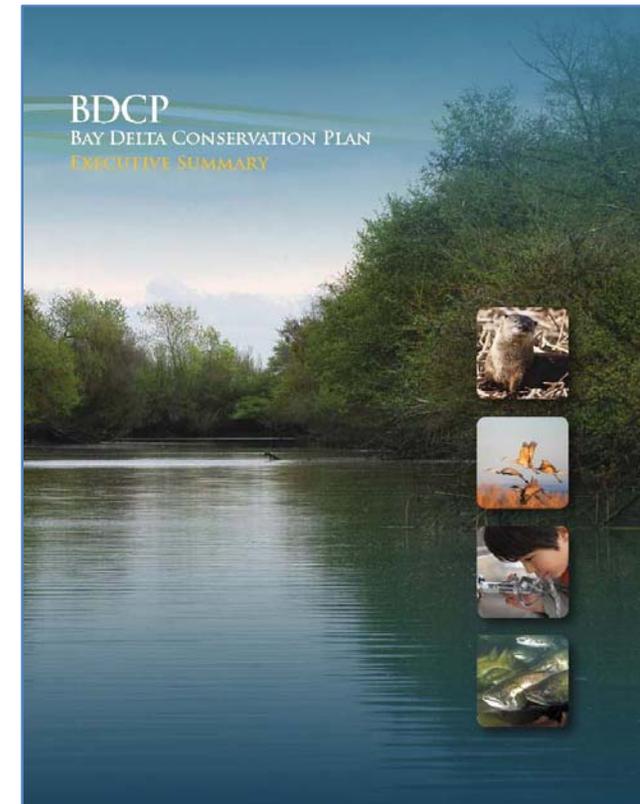
Delta Stewardship Council

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Role of the Council with regard to the BDCP (Water Code 85320 (c) – (g))

- ☞ Responsible agency for EIR
- ☞ ISB to review EIR
- ☞ DWR is required to consult with DSC
- ☞ If the BDCP is approved, DSC shall incorporate it into the Delta Plan
- ☞ DFW approval may be appealed to the Council
- ☞ DSC may make recommendations regarding BDCP implementation



Staff and consulting team review process

-  Reviewed BDCP EIR/S
 - *Revised Notice of Preparation (NOP)*
 - *2012 and 2013 administrative drafts*
 - *December 2013 public review draft*
-  Reviews by the Delta Independent Science Board (ISB) and Effects Analysis Independent Science Review Board (IRB)
-  Reviewed responses and changes to the BDCP from earlier comments

Key concerns

-  Delta Reform Act requirements:
 - *Water remaining for exports and other uses*
 - *Climate change*
 - *Flood management*
 - *Resilience and recovery*
 - *Water quality*
-  Identify any Delta Plan conflicts

Key concerns

-  Uncertainties about mitigation for impacts to biological resources
 - *Presentation of conservation measures at programmatic level*
 - *Benefits of habitat restoration may be overstated*
 - *Timelines for achieving benefits may be overly optimistic*
 - *Modeling uncertainties affect ability to predict outcomes*

Key recommendations

-  Reduce uncertainties from programmatic level by developing regional conservation strategies for ROAs
 - *Increase confidence that habitat CMs will work as intended*
 - *Identify realistic timelines for achieving benefits*
 - *Integrate with measures to reduce impacts to agriculture, infrastructure, and recreation*
 - *Consider staged EIR*
-  Assess impacts from modeling uncertainties

Key concerns

-  Better assess and mitigate water quality impacts
 - *Needs of aquatic species, not just SWRCB water quality objectives*
 - *San Francisco Bay, especially sediment supplies*
 - *Consider changes through time*
 - *In-Delta water quality impacts*

Key recommendations

- Specify feasible mitigation measures for water quality impacts
- Don't defer mitigation

Key concerns

-  Impacts to agriculture, recreation, community character, scenic resources, and cultural resources
 - *Programmatic nature of CMs limits assessing impacts*
 - *Recreation impacts from boating inspections*
 - *Better convey BDCP's construction zone impacts*
 - *Assess aesthetic impacts from highway and boater views*

-  Don't defer identification of mitigation for adverse impacts to water quality, agriculture, recreation, and cultural resources

Key recommendations (continued)

-  If specific mitigation cannot be identified, specify detailed performance standards
-  Better identify specific mitigation measures for :
 - *Agriculture*
 - *Recreation*
 - *Community character*
 - *Aesthetics and cultural resources*

Next steps

-  Send comments (including those from the ISB) to the BDCP agencies
-  Offer to meet with BDCP agencies to reach closure on comments

Questions?

www.deltacouncil.ca.gov

