

Impacts to Delta communities

1. Local Agencies of the North Delta (LAND)

2015 comments on the BDCP/WaterFix

Complete document here:

<http://restorethedelta.org/wp-content/uploads/2015/11/LAND-WaterFix-Alt.-4A-Cmnt-Ltr-10.30.15.pdf>

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Implementation Structure is Entirely Absent

[No governance structure to address local impacts]

LAND has previously commented on the BDCP Chapter 7 Governance structure proposed under Alt. 4, pointing out its inadequacy with respect to addressing local impacts during and after project construction. **Now, with Alt. 4A, there is no governance structure at all,** and the implementation will apparently be carried out by the SWP and CVP contractors via the Delta Conveyance Facility Design and Construction Enterprise. The existence of “Environmental Commitments” (“ECs”) (RDEIR/S, App. 3B) does nothing to allay these concerns. **As described in this and other comment letters, the impacts on local communities will be severe, including interruption and degradation of drinking and irrigation water supplies, interruption of access to farms and homes, damages to roads, homes and other structures from subsidence induced by dewatering, and structural or other damages from excessive construction noises and vibrations.** LAND is disappointed that its prior suggestion to create a local concerns and claims alternative dispute resolution process to address these issues is not included in the RDEIR/S. The Government Tort Claims Act is entirely inadequate and too slow to adequately address the scope and scale of the readily foreseeable impacts to local communities and agricultural operations. **The absence of any plan to address these localized impacts indicates not only a complete disregard for the burdens and significant environmental and other impacts the project would put on local communities, but also is an abrogation of CEQA and NEPA’s most basic mitigation requirements.**

2. County of Sacramento

2014 Comments on BDCP

Complete document here:

<http://northdeltacares.org/wp-content/uploads/2016/06/Sacramento-County-BDCP-Comments-June-2014.compressed.pdf>

The DEIR/EIS’s conclusion that the action proposed under CM-1 (conveyance) will have a significant and unavoidable impact associated with the “creation of physical structures adjacent to and through a portion of an existing community” (LU-3) **does not convey the full scope of the BDCP’s impact on Delta communities. The scale of both the proposed water conveyance (operations and diversion infrastructure) and the 21 habitat restoration measures are massive,** making the resulting short- and

long-term impacts difficult to comprehend/grasp. When evaluated in its entirety, in concert with the numerous identified construction-related impacts of the conveyance facility, occurring over a 10-12 [now 14] year period, and restoration actions, occurring over a 50-year period, it is unfathomable to conclude that the proposed habitat conservation plan will not just “create physical structures” in and around existing communities but will permanently and adversely alter the very much valued and generation-old agricultural land use pattern for which the Delta is known.

~~Strikeout~~ refers to information is no longer applicable to the preferred Alternative 4A.