



July 25, 2014

BDCP Comments

Ryan Wulff, NMES

650 Capitol Mall, Suite 5-100

Sacramento, CA, 95814 released in December 2013

Via email: BDCP.Comments@noaa.gov-comments

This comment letter is being written on behalf of the Willis Jepson Chapter of the California Native Plant Society, serving Solano County. The letter comments on the Draft EIR/EIS released in December 2013 for the Bay Delta Conservation Plan (BDCP). The lengthy document provides an analysis of the potential impacts for constructing many water conveyance alternatives through a large part of the delta of California. While Solano County is not within the footprint of the construction, Suisun Marsh located in Solano County, will be impacted by changes to water quality, sediment flow, infrastructure modifications, and proposed restoration. Construction of any of the tunnel or pipeline alternatives will be major undertakings that will impact beyond the construction footprint due to the large amount of truck and other vehicle traffic, movement of sediment, and general activity in an area unused to such things. Dust and vehicle exhaust in particular, will impact plants in the area including native plants along construction corridors and adjacent area. While the DEIR/EIS discusses sensitive plants and communities, the average and very important natural plant communities in the delta will also be impacted. We cannot afford to lose them. How will indirect impacts to natural plant communities be minimized with such a huge project? We did not see an analysis of the ongoing cumulative effects of construction and maintenance.

Suisun Marsh impacts are not clear. CM 4 discusses tidal marsh restoration in general and focuses on fish impacts. It is unclear what the impacts to rare marsh plants will be when areas are converted to tidal marsh. Weed impacts, such as from pepperweed, are not addressed. Can you specifically address impacts to Suisun Marsh from the project implementation and what the proposed mitigation measures will be?

The project alternatives are many, however, the need for this project is not convincing. Have you considered alternatives such as placing a pipeline in the existing concrete conveyance channels or covering the existing water conveyance canals to reduce the huge amount of existing loss due to evaporation? What is the cost benefit in gallons for these measures? Please add this type of measure to the alternative to the discussion.

Water conservation by end users is not mentioned. One alternative should be a no or minimal construction alternative with more conservation (less water pumped). We'd like to see these types of alternatives in the document. CNPS is a proponent of using low water use native plants in gardens. We know there is a different way to landscape that does not include the existing large amounts of water consumption.



Lastly, it is not clear from the DEIR/EIS and draft plan what kinds of maintenance, such as weed control, will be provided with this plan. There is a section on aquatic invasives through boating outreach, however there does not seem to be any commitment to actual on the ground invasive species (weed) control in the both the aquatic or terrestrial of the project. Invasive species increases can be anticipated in all of the construction areas and with water quality changes anticipated with the plan. These invasives have the potential to eliminate entire natural communities including sensitive species. What invasive species (weed) impacts are anticipated and what measures will be provided in the future to mitigate?

Sincerely

Submitted by

Susan Wickham on behalf of the
Willis Jepson Chapter
California Native Plant Society
PO Box 2212
Benicia, CA 94510

Email: swgeo1@gmail.com

