

May 15, 2014

League Opposes BDCP EIR Certification

The League of Women Voters of California (LWVC) has asked that the EIR/EIS for the Bay Delta Conservation Plan (BDCP) not be certified. LWVC President Jennifer A. Waggoner stated, "It is unlikely that the preferred alternative will meet the coequal goals of providing a reliable water supply and protecting, restoring and enhancing the Delta ecosystem."

In addition, the League cited inadequate disclosure of impacts arising from issues such as over-allocation of water rights, lack of flow objectives essential for habitat restoration, an inadequate funding plan, and the need to include natural resource interests in the governance structure.

Water Supply and Reliability

Water rights within the watersheds feeding into the Delta, plus the maximum contracted flows planned for export to contractors, exceed the long-term hydrologic capacity of this water resource. The BDCP compounds these mistakes.

In particular, the stated project objective of meeting the full contract amounts of the State Water Project and Central Valley Project is unrealistic. More encouragement is needed for the state, local governments, and urban and agricultural end-users to conserve and improve efficiencies before resorting to dual tunnels under the Delta.

Protecting, Restoring and Enhancing Delta Ecosystem

The BDCP fails to meet the requirements of the Delta Vision Strategic Plan and the Delta Reform Act of 2009 by not addressing the coequal goals of providing a more reliable water supply for California and protecting, restoring and enhancing the Delta ecosystem. In addition, the plan is missing updated flow objectives, a key factor in the success of habitat restoration.

The BDCP does not demonstrate that funding all elements – in particular, habitat restoration – will be realistically achieved. Furthermore, agencies and advocates for natural resources need to be elevated in the proposed governance structure to ensure that ecosystem restoration actually has coequal status under the BDCP.

There needs to be a management regime that will fairly balance all of the needs and uses of water resources in the state, without a bias toward the contractors for the State Water Project and the Central Valley Project.

In summary, the LWV of California believes that, before construction of any large-scale infrastructure for the Bay-Delta, technical and financial resources must be made available to maximize statewide efforts for conservation, recycling, watershed management, regional water supply development, completion of Delta habitat restoration already underway, and for any other measure that will reduce reliance on Bay-Delta exports now and in the future. The League's comments are based on LWVC positions on water resources, agriculture, energy and land use. In addition the League held an interview with Department of Water Resources staff, and submitted a detailed list of questions, which were responded to by DWR.

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