

Advantages and Disadvantages of Including Specific Habitat Restoration Projects in the BDCP EIR/EIS

The BDCP EIR/EIS Environmental Review Process

The environmental review of the BDCP will assess the effects on the environment of the adoption and permitting of a Plan that provides for the conservation of certain biological resources and establishes mitigation requirements for specified covered activities that may affect those resources. As part of this Plan, commitments will be made to restore a certain amount of aquatic habitat, including tidal marsh, within identified Restoration Opportunity Areas. The environmental analysis conducted for the BDCP will take the entirety of this habitat restoration into account in the context of the overall project description for the BDCP. The BDCP EIS/EIR, however, may or may not include analyses sufficient to fully support the implementation of specific restoration projects incorporated into the BDCP. To include these site-specific restoration projects within the BDCP EIR/EIR, additional analysis would be necessary beyond that which is required for the Plan itself. If this additional analysis is not included in the BDCP EIS/EIR, these site specific projects would undergo subsequent environmental review pursuant to NEPA and CEQA during the implementation of the BDCP.

It has been proposed that certain site specific habitat restoration projects identified in the proposed BDCP conservation measures (“phase 1” projects) be implemented immediately upon approval of the BDCP. It has been further proposed that, to enable accelerated implementation of these restoration actions, the phase 1 projects be fully analyzed in the BDCP EIS/EIR to determine their effects on the environment (e.g., impacts on land use, cultural resources, transportation, etc.). The following provides a brief assessment of the advantages and disadvantages to the BDCP process associated with this proposed approach and sets out an alternative strategy to enable these projects to proceed on an expedited timeframe.

Potential for Additional Information to be Developed to Conduct an EIR/EIS Evaluation for Each Phase 1 Project

To adequately evaluate the phase 1 restoration projects in the BDCP EIS/EIR, some additional information may need to be developed or included, such as:

- Site-specific restoration conceptual designs (e.g., new levee locations, levee removal, pre-flood land sculpting, need for spoil or borrow areas, vector control such as mosquitoes and rodents)
- Timing of implementation (including timing of construction activities)
- Equipment to be used (to determine impacts on air quality, transportation for employees and construction materials, and socioeconomics related to employment)
- Site specific environmental setting, including existing biological resources, land use, infrastructure, geotechnical, and historical and cultural resources
- Potential for benefits and impacts to effect the sites and adjacent areas, including changes in flood management or risk, changes in seepage, changes in availability and quality of adjacent surface water and groundwater supplies, potential changes in recreational opportunities
- Resolution of likely third party issues (e.g., seepage issues; design and relocation of onsite infrastructure, such as gas pipelines; effects on flood control)

Summary of Advantages and Disadvantages of Including Phase 1 Projects in the BDCP EIR/EIS

Advantages	Disadvantages
<ul style="list-style-type: none"> • Projects would be “shovel ready” at completion of BDCP EIR/EIS process, allowing a quick start toward achieving restoration goals • Projects could include some aspects of mitigation for conveyance construction, especially where terrestrial habitats are protected in conjunction with tidal restoration • Consolidation of environmental review of these projects with the BDCP review may assist the public in its review of the EIR/EIS 	<ul style="list-style-type: none"> • Design criteria, layouts, and construction sequencing may need to be defined on an accelerated basis, including geotechnical engineering for modifications of embankments • Further investigation may be necessary to ensure that projects will not adversely affect ongoing projects or require agreements to avoid future conflicts (e.g., DFG plans for Decker Island and Calhoun Cut/Lindsey Slough) • Field surveys related to biological, historical/cultural, and other resources would need to be completed over the next several months • Significant additional analysis would be required to adequately assess socioeconomic and other potential effects of the specific projects • Assessments of specific sites may reveal environmental issues of a level of complexity that would affect the schedule for the preparation of the BDCP EIR/EIS. • Existing and ongoing planning and compliance processes may inadvertently be adversely affected • Effort required to adequately analyze the cumulative effects related to these specific projects may adversely affect schedule for the BDCP environmental review

Alternative Approach to the Environmental Review of Site Specific Restoration Projects within the BDCP EIR/EIR

An alternative to the approach proposed above may also be adopted. Under this approach, a list of potential projects (same as the list of phase 1 and phase 2 projects plus any others that might be identified as BDCP planning progresses) would be identified in the BDCP as projects that might be implemented in the early near term period. While an assessment of the environmental effects of all habitat restoration would be conducted in the context of the overall Plan, these individual projects would not be evaluated on a site-specific basis in the BDCP EIR/EIS. Rather, these projects would be analyzed on a parallel, but separate, track from the BDCP EIS/EIR. Certain phase 1 restoration projects are already on such a track, such as Dutch Slough and McCormick/Williamson Tract, which have been subject to nearly-completed environmental review. This approach would allow for accelerated implementation of these restoration projects without putting at risk the schedule for the public draft of the BDCP EIR/EIS.