

July 27, 2016

SWRCB Policy Statement

To the State Water Resources Control Board:

In its 2014 comments on the BDCP EIR, the County of Sacramento identifies some very serious effects on groundwater that will have major impacts on the people who live and farm in the project area. These include:

- Substantial depletion of municipal and agricultural water supplies
- No mitigation to offset well losses due to liquefaction and settlement caused by pile driving, boring etc.
- No effort to quantify how much water would be unavailable for existing uses
- No offset for diminished groundwater quality
- No offset for increased energy use created by the need for deeper wells
- Effects are considered temporary, even though the project will go on for 10 (now 14) years.

Here is what the County comments say:

"The BDCP is likely to **substantially deplete municipal and agricultural water supplies** within the Delta construction area, from construction area dewatering as well as **construction induced liquefaction and settlement** (such as from pile driving, tunnel boring and operation of other heavy equipment), **which could adversely affect groundwater levels, and operation and integrity of wells**. The DEIR/EIS **glosses over these serious effects by characterizing them as "temporary," even though construction will take place for 10 years or more.**"

The DEIR/EIS makes **no effort to estimate the quantity of water that the BDCP would make unavailable for existing uses**. As mitigation, the DEIR/EIS proposes to offset domestic losses attributable to dewatering (**but not losses or adverse effects attributable to diminished groundwater quality, or from losses caused by construction-induced liquefaction and settlement**). Measures proposed to achieve this objective include installing sheet piles to depths below groundwater elevations, deepening or modifying wells used for domestic purposes to maintain water supplies at preconstruction levels, or securing potable water supplies from offsite sources.

Further, it is not clear whether the DEIR/EIS evaluated the **secondary impacts associated with well deepening, including increased energy use** and air quality impacts from the additional pumping that will be required to obtain water from deeper wells.”

If the project receives a permit, the permit should be conditioned to address these impacts. Specifically:

- Compensation for liquefaction and settlement to pay for damage to pumps and intakes.
- Identify the quantity of water that will be unavailable for existing uses. People have a right to know this information.
- Compensation for reduced groundwater quality. Residents may require filters on their water systems.
- If residential and agricultural users must dig deeper wells, the project should not only pay for well deepening but also pay the increased energy bills in perpetuity. Local users should not have to shoulder this burden.

Thank you for hearing my concerns.

Sincerely,

Richard Marshall
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