

# DCC Engineering Co., Inc. Delta Conveyance Project – Consistency Appeal

Hearing Presentation (20-slide limit)

Policies: RR-P1, RR-P3, DP-P2 • Cert.

ID C20257

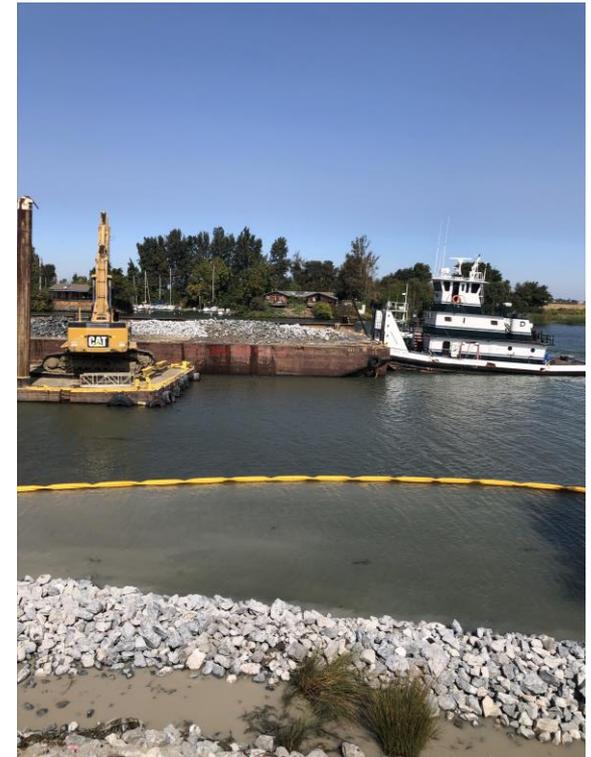
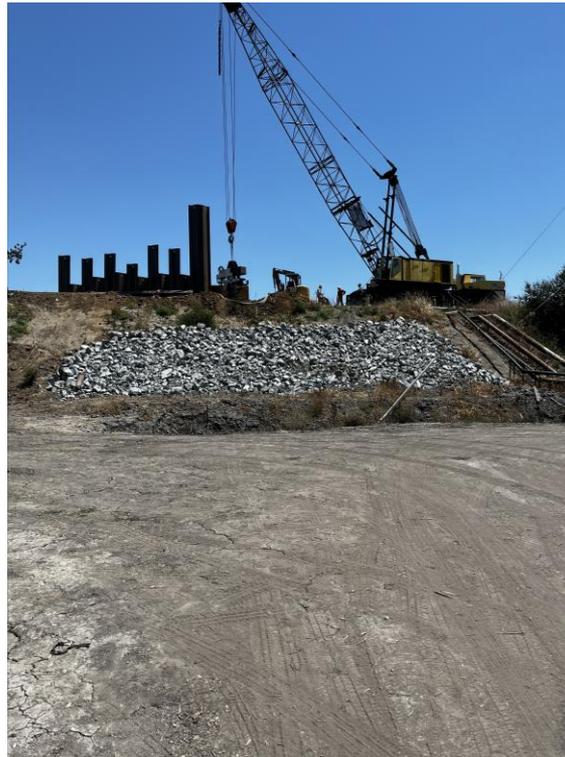
# RR-P1 Prioritization of State Investments in Delta Levees

- RR-P1 requires prioritization of State investments in Delta levees and risk reduction
- DWR's Certification states RR-P1 is "not applicable" because the project "involves no investment in Delta levees"
- The covered action includes levee alterations and depends on the Delta levee system during construction



# RR-P1 Prioritization of State Investments in Delta Levees

- The Project creates a high demand for materials and equipment also needed for levee rehabilitation:
  - rock / riprap / aggregate
  - trucking
  - sheetpile
  - qualified contractors
  - specialized heavy duty equipment



## RR-P3 Protect Floodways

- RR-P3 protects floodways from encroachments that reduce capacity, impair conveyance, or increase flood risk
- The Certification states RR-P3 is “not applicable”
- But the covered action includes levee-adjacent staging, ramps, pads, and access work that can affect flood-fight access and levee stability



Source: DCA DCP FEIR Chapter 3 Mapbook, 2023



Source: DCA Delta Conveyance Project Q&A, 2022



# Conclusion

- The FEIR describes the construction conditions and demand drivers
- The Certification does not evaluate:
  - displacement of priority levee investments (RR-P1)
  - floodway encroachment (RR-P3)
  - impairment of existing Delta land uses and impacts to funding of levee maintenance (DP-P2)
- DWR cannot avoid these policies by declaring them “not applicable”
- Request DSC to remand the Certification of Consistency to DWR

