

SFBANTA
San Francisco Bay Area Nordic Tug Association
985 Whitman Lane, Concord, CA 94518-3319

July 21, 2014

BDCP Comments
Ryan Wulff, NMFS
650 Capitol Mall, Suite 5-100
Sacramento CA 95814



RE: Comment on the EIR/EIS as it relates to boating:

General Statement

SFBANTA (San Francisco Bay Area Nordic Tug Association) is an organization of 26 cruising boat owners who live throughout the San Francisco Bay and Delta area. Our boats are trawlers, pleasure boats ranging in length from 26 feet to 42 feet and weighing 7,000 to 30,000 pounds. We often cruise on the Delta, enjoying its wildlife, silence, beauty and anchorages (including The Meadows). Like many boats on the Delta, we are not small fishing boats.

Individually, we have many concerns about the BDCP, including cost, loss of good agricultural land, unsecured funding, and environmental and economic impacts.

As an organization, and before deciding to respond as a group to the EIR/EIS, we held several discussions and informative meetings attended by about 50 people and resulting in a unanimous decision to oppose the BDCP, especially its focus on twin tunnels diverting Sacramento River water from the Delta as a solution to water availability statewide.

In our review, we found the EIR to be redundant and overwhelming. The intent appears to confuse and not seriously address the many real and important impacts of the proposed BDCP.

The EIR/EIS is biased towards the tunnels:

- It fails to seriously consider other less expensive and less destructive alternatives, such as storage, conservation, levee reinforcement and desalination.*
- It fails to identify guaranteed funding for habitat restoration once the damage to waterways has been done.*
- It fails to explain why the dual tunnels option is favored when it will irrevocably harm the Delta and its economy and wildlife, but produce NO additional water.*

However, for our purpose here, we wish to focus on our expertise - which is BOATING.
Issues of navigation, cruising, boating safety, and economic impact on Delta marinas has not been adequately addressed by the EIR/EIS.

Dams and Barriers

Chapter 15 states that "an operable barrier would be placed at the head of Old River at the confluence with the San Joaquin River (15.3.3.9 page 15-253)." It continues: "There are no recreation sites within the impact area for the operable barrier at the head of Old River and San Joaquin River" (Draft EIR/EIS November 2013 page 15-260)." The operable barrier is also mentioned in passing on page 15-265 without discussing its significant impact or acknowledging that the entire Delta is a recreation site.

What is an “operable barrier” (p.15-269)? Can it handle the many large boats that travel along Old River? What alternative routes, if any, will be available? What impact will these barriers have on the velocity of current...on fish? What is the design and utility of the boat lock mentioned on page 15-269? What will be the impact if, as has been promoted (and implementation already attempted), a dam is also placed on False River?

Barge Unloading Facilities: Construction of five barge unloading facilities “may require partial channel closures” for about five years and “present a temporary barrier to boats and related recreation.” (p.15-268)

- “The South Mokelumne River barge facility would be on the southern end of Staten Island (p.15-268).” Many of us have transited that river, and found it to have many shallow spots. At best, this, as stated, constricts boat traffic; it also increases the risk of boats going aground.
- The San Joaquin River barge facility “would be on the west side of Bouldin Island, on a wide bend in the river (p.15-268). If on the San Joaquin River, another shoaling area, this may force more boats into the shipping channel to avoid running aground, creating potential safety hazards. Most of the west side of Bouldin Island is bounded by the Mokelumne River and several substantial marinas and resorts. Again, the area is not all deep water and the congestion might cause boats to run aground or suddenly change course to avoid running aground.
- The Middle River barge facility would be “on the north side of Bacon Island...500 feet west of Connection Slough” (p.15-268). That is an area of narrow sloughs with a swing bridge to the east. If the dam is installed at Old River and San Joaquin River, this area will see increased boat traffic, especially if a dam is also put up at False River. Large boats will need the bridge to be opened. As noted, peak boat traffic volume may be high.
- Similar high volume concerns exist for the Old River and Italian Slough barge facilities, although larger boats tend not to travel that far south.

Noise and Lighting

The EIR/EIS diminishes the impact of construction noise and lighting: “The noise of construction and piles of muck will make many popular anchorages and destinations inhospitable” (as if nothing could be done to prevent it).

- “In water construction would be further limited primarily to June 1 through October 31 each year (p.15-260)” — and this is the summer season!
- Construction would take place Monday through Friday for 24 hours a day -- but many boaters use their boats during the week and not just on weekend.
- The EIR/EIS mentions “bright lights that would negatively affect nighttime views from the work area...would affect any overnight camping at the recreation sites” (p.15-260). But what about the effect on boats at anchor in the Delta’s many anchorages?
- Noise and lights from 24-hour activity over 5-plus years will drive away the cruising boats that support Delta businesses. Most of us know and enjoy the Delta for its recreation and wildlife. We appreciate its serenity and quiet. We enjoy the birds.

Quietness is a real Delta asset, one that the EIR fails to appreciate. What's the point of anchoring out if you can't swim or fish due to water quality, lights are on all night and it's noisy? "Noise" is not an "unavoidable" impact –it is quite avoidable if other alternatives are considered. By failing to equally address all options, the BDCP fails in its mandate to address the co-equal goals of water reliability and improving the Delta ecosystem.


Economic Impacts

The EIR/EIS grossly understates the impact eight to ten years of construction will have on recreation and the Delta's economy. Many of these businesses cannot afford years of disruption. When they go out of business – and they will -- not only will the economy of the Delta be impacted, but we will have no access to marine-oriented commercial services. The EIR/EIS seems to conclude that boat passage and navigation would be impeded for five years – and that there is no way around it. It diminishes the impact.

- Muck has been renamed "Reusable Tunnel Material" – but what studies have been done to assure that it is truly reusable and not toxic, to fish or to humans. Will water quality be impacted during the long construction period? Will this result in undesirable conditions for swimmers or water skiers? The giant muck ponds will be forever in the Delta, and will be too close to communities and recreational areas.
- "Boating opportunities would still be feasible, but it is possible that marina users would be disturbed by noise and visual disruptions (p.15-258)". This is regarding Wimpy's Marina but a relevant observation for other marinas, yacht clubs and anchorages as well.
- The EIR/EIS mentions specific recreation sites – but the entire Delta is a recreation site, connected by waterways that are narrow, often shallow in spots – and destined, under this plan, to be blocked, temporarily or permanently. Better solutions should be studied.

Respectfully submitted by,

San Francisco Bay Area Nordic Tug Association


Richard Smith, President
Pat Borison, Secretary
Irwin Scott, Treasurer

