



RBOC
Protecting your boating interests.™

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November 30, 2022

Via email to: deltaconveyancecomments@water.ca.gov

California Department of Water Resources
Attn: Delta Conveyance Office
P.O. Box 942836
Sacramento, CA 94236-0001

RE: Delta Conveyance Project Draft Environmental Impact Report

Delta Conveyance Office:

Recreational Boaters of California [RBOC] opposes the Delta Conveyance Project that would negatively impact the ability of the recreational boating public to navigate in the waterways of the Sacramento-San Joaquin Delta [Delta].

RBOC is the statewide nonprofit advocacy organization that promotes the protection and responsible use of the state’s waterways. We have commented previously and consistently as the state has considered the Bay Delta Conservation Plan, the California Water Fix and now the single Delta Conveyance Project.

This project has several fatal flaws. Specific to recreation, the project would severely disrupt navigation, boating-related commerce and communities throughout the lengthy, fourteen years of construction. It is a false assumption that recreational activity would merely move to other areas.

There is a potential for the project to significantly increase the transport of invasive species into the Delta waterways, and to exacerbate the occurrence of harmful algal blooms. These reduce recreational opportunities on the waterways and already impose significant costs on the boating community.

These boating impacts would be long-term and even permanent. However, the project fails to adequately identify and fully mitigate these impacts with certainty.

While the project might enhance the availability of fresh water for transport out of the Delta, the \$14 billion expenditure would hasten the demise of aquatic conditions in the Delta as climate change occurs. The foreseeable impacts include higher air temperatures, varying seasonality of inflows, fluctuations in wet weather periods as well as droughts, decreased snow melt, increased risk of wildfires, saltwater intrusion further into the Delta, higher sea levels, and decreased water quality especially during droughts.

- Todd Leutheuser**
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Recreational Boaters of California

Delta Conveyance Project Draft Environmental Impact Report

November 30, 2022

PAGE TWO

However, the draft environmental impact analysis inadequately analyses these future risks. It unrealistically limits the future conditions only to the year 2040 for the evaluation of the climate as well as social impacts. It also fails to either disclose or evaluate numerous uncertainties, unknowns, and assumptions associated with the project.

To the contrary, the laws, policies and projects that are already in place including water conservation, recycling, ground water recovery, desalination plants, surface water storage, ground water management, support a No Project Alternative.

RBOC remains concerned that this project creates no new sources of water to address the impacts of the drought, climate change, and population growth. The primary emphasis is to move high quality water from the Delta, which would leave poor quality water for the inhabitant fish species, wildlife and humans. The project does not restore and protect the Delta and its ecosystems. The mitigations are weak to non-existent and in many instances, impacts are mischaracterized as 'LTS' [less than significant] to 'NI' [No Impact].

In summary, the key concerns are:

1. Disruption to navigable waters in the Delta for 14 years during construction
2. Does not adequately address climate change and its impacts on decreased snow melt
3. Unquantified Groundwater Impacts (for Example Table 8.0) non meaningful LTS – Less Than Significant
4. Does not create any new sources of water
5. Will wreak havoc on the aquatic species, wildlife, inhabitants, recreational users and supporting industries

For these reasons, RBOC is opposed to the project. Thank you for this opportunity to comment on the draft environmental impact report. I can be reached at 562-896-2161, or feel free to contact RBOC's advocate, Jerry Desmond, at 916-441-4166.

Sincerely,

Todd Leutheuser

Todd Leutheuser, President