

**NORTHERN  
CALIFORNIA  
MARINE  
ASSOCIATION**

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JUN 30 1998

30 Jack London Square, Jack London Village, Suite 204 • Oakland, CA 94607  
(510) 834-1000 • Fax (510) 834-1076

26 June 1998

Mr. Rick Breitenbach  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

Subject: Comments on the Programmatic EIS/EIR, March, 1998

Dear Mr. Breitenbach:

I am writing on behalf of the Northern California Marine Association, a non-profit trade association representing approximately 300 member companies involved in the recreational marine industry in Northern California. According in an economic impact study conducted for the Department of Boating and Waterways in 1997, recreational boating contributed \$11 billion in gross state product in 1995. Of that amount, \$6.8 billion was attributable to direct spending. The industry provides 183,000 jobs to the state's work force and generates \$569 million in state and local tax revenues.

The Bay-Delta region is a unique recreational boating resource because of its 1000 miles of waterways and over 12,000 berths. Of the approximately 200,000 boaters who are attracted to the Delta each year, many come from surrounding counties—there are over 250,000 registered boats in the Delta counties—however, the region attracts boaters from throughout the state and the nation. Recreational survey reports indicate that boating participation accounts for over 35.2 million activity days per year in the area. While cruising is the most popular boating activity that occurs in the Delta, other activities include fishing from a boat, water skiing, and swimming from a boat.

Recreation, along with agriculture and wildlife habitat, constitutes one of the three existing land uses in the Delta. The language in the legislation which established the Delta Protection Commission in 1992 recognized recreation's significance to the area when it noted that "...the delta's waterways and marinas...[and] recreational boating within the delta is of statewide and local significance and is a source of economic benefit to the region..." (Public Resources Code Section 29712). The DEIR should recognize recreation's importance as a beneficial use, yet it appears to be a missing piece of the jigsaw puzzle that CALFED is attempting to put together.

The DEIR suggests numerous actions designed to protect habitat which would have significant impacts on recreational boating activities. These actions include: adoption of speed zones; reductions in boat traffic; and temporary, seasonal, or permanent closure of

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Delta waterways. While mitigation of these impacts is recommended, the DEIR does not seriously consider how that mitigation could be achieved. For example, what would be the process for identifying sites and for gaining the necessary permits? Nor does the document adequately address jurisdictional considerations and legal authority regarding navigational waterways.

The DEIR fails to address the requirements of the Davis-Dolwig Act of 1961 which requires that planning for public recreation use be part of the project formulation for activities in connection with State-sponsored water projects. This oversight highlights the DEIR's failure to fully appreciate the Delta's significance as a recreational resource.

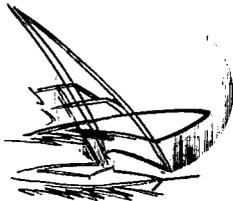
The Northern California Marine Association appreciates the importance of the CALFED process and supports the concept of working together to devise reasonable solutions. However, such considerations must include the recreational community, it too is a key stake holder in the Delta.

Thank you for the opportunity to present our views.

Sincerely,



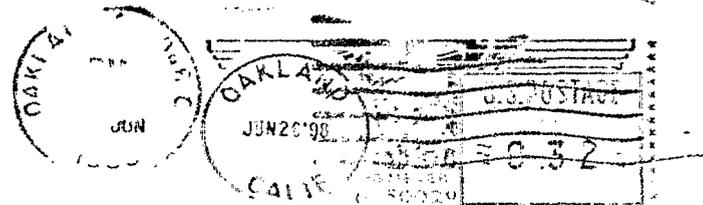
(Ms) M'K Veloz  
Administrative Director



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