

The new EIR/S does not adequately mitigate the challenge reducing recreation in the Delta. As stated in the Administrative Draft Supplemental EIR/EIS states:

1. REC-1: “The impact....**associated with permanent displacement of public use or private commercial recreation areas** as a result of the proposed project would be less than....**The impact under the proposed project would remain less than significant.** No mitigation is required.

2. REC-2: Result in Long-Term Reduction of Recreation Opportunities and Experiences as a Result of **Constructing the Proposed Water Conveyance Facilities**: “The modification to the footprint of the water conveyance facilities under the proposed project would result in indirect impacts on one additional recreation site....Overall, the impacts on recreation opportunities between the proposed project and the approved project would be very similar and no substantial incremental change would result. Mitigation measures set forth below would reduce some construction-related impacts; however, **the level of impact would not be reduced to a less-than-significant level and would remain significant and unavoidable.**”

3. REC-3: Result in **Long Term Reduction of Recreational Navigation Opportunities** as a Result of Constructing the Proposed Water Conveyance Facilities: **The Mitigation measures set forth below would reduce some construction-related impacts; however, the level of impact would not be reduced to a less-than-significant level and would remain significant and unavoidable.**”

4. REC-4: Result in Long-Term Reduction of Recreational Fishing Opportunities as a Result of Constructing the Proposed Water Conveyance Facilities: The mitigation measures indicated below would further reduce the remaining potential impacts on recreational fishing opportunities. **With implementation of mitigation, this impact would be less than significant.**

5. **Cumulative Analysis: The analysis of impacts on recreation for the approved project conclude that constructing the approved project would not result in significant cumulative impacts. Constructing the proposed project would be conducted in a very similar fashion to the approved project.The proposed project would continue to have NO CUMULATIVE EFFECT on displacement of recreational facilities, temporary**

disruptions to recreation opportunities, recreational navigation, recreational fishing and other recreation opportunities.

North Delta CARES continues to declare that this approved project will have devastating short term and long term effects on recreation (and tourism) in the Delta. Even with mitigation, CA WaterFix states that in 2 Recreation Areas, (#2) reduction of recreation opportunities and experiences as a result of construction, and (#3) long term reduction of recreational navigation opportunities, **would remain significant and unavoidable.**

CA WaterFix states that (#1) Permanent displacement **of public use or private commercial recreation areas and (#4) Long-Term Reduction of Recreational Fishing Opportunities impact would be less than significant.**

CA WaterFix also states that the analysis of impacts on recreation for the approved project conclude that constructing the approved project would not result in significant cumulative impacts and further states, “The proposed project would continue to have NO CUMULATIVE EFFECT on displacement of recreational facilities, temporary disruptions to recreation opportunities, recreational navigation, recreational fishing and other recreation opportunities.

<https://www.merriam-webster.com/dictionary/cumulative%20effect>

Definition of cumulative effect

: an effect produced by something happening over a long period of time

the *cumulative effect(s)* of smoking on the body

cumulative [play](#)

: increasing by [successive](#) additions

: made up of accumulated parts

: tending to prove the same point

effect [play](#)

: something that inevitably follows an [antecedent](#) (such as a cause or agent)

: a distinctive impression

: the creation of a desired impression

: to cause to come into being

: to bring about often by [surmounting](#) obstacles : accomplish

: to put into operation Definition of effect

1 : something that inevitably follows an [antecedent](#) (such as a cause or agent)

2 a : a distinctive impression

the color gives the effect of being warm

b : the creation of a desired impression

her tears were purely for effect

c (1) : something designed to produce a distinctive or desired impression —usually used in plural

(2) effects plural : [special effects](#)

3 : the quality or state of being operative : [operation](#)

the law goes into effect next week

4 : power to bring about a result : [influence](#)

the content itself of television ... is therefore less important than its effect

—*Current Biography*

5 effects plural : movable property : [goods](#)

personal effects

6 : an outward sign : [appearance](#)

7 : [accomplishment](#), [fulfillment](#)

8 a : [purport](#), [intent](#)

b : basic meaning : [essence](#)

— in effect

: in substance : [virtually](#)

the ... committee agreed to what was *in effect* a reduction in the hourly wage

—*Current Biography*

— to the effect

: with the meaning

issued a statement *to the effect* that he would resign