



RBOC
Protecting your boating interests.™

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March 25, 2024

Commander, District 11 (dpw)
Coast Guard Island, Building 50-2
Alameda, CA 94501-5100
Attn: Aids to Navigation
By e-mail: Samantha.G.Kovel@uscg.mil
cc: PADETSF@uscg.mil, PADETLA@uscg.mil, PADETS@uscg.mil,
NAVZENWebTEAM@uscg.mil

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Legislative Advocate
Jerry Desmond
Director of
Government Relations

Re: Proposed Mass Decommissioning of lighted and bell buoys marking California harbor entrances

Affects: LLNR 10, 330, 415, 430, 35, 440, 455, 490, 2435, 2290, 3010, 3107, 3325, 3595, 3675, 3755, 3840, 3970, 4080, 4130, 4140, 4190, 4605, 7765, 8375 (see last page)

Dear Ms. Kovel and navigation team:

Recreational Boaters of California (RBOC) respectfully notes with deep concern the Coast Guard's apparent plans to **decommission a majority of the light and/or sound markers guiding craft into California harbors**. As published in the Coast Guard's 6/24 LOCAL NOTICE TO MARINERS, it appears that USCG has concluded that electronic and virtual markers and guidance (V-AIS) are sufficient, and sound or whistle buoys or lighted buoys are *no longer needed to guide recreational and other mariners into port* in low visibility or bad weather conditions.

RBOC urgently requests that the Guard **reconsider** this planned mass removal of tangible aids to navigation. Literally every boater, sail racing group, and day sailor we've had the chance to consult so far, since your bulletin last month, thinks it's a bad idea, if not actively dangerous.

Acknowledging that your buoy removal plans are subject to a *series* of comment deadlines, it still seemed clearest to respond to the entire program of degrading navigation guidance. Kindly accept this as a comment against all of the LLNR requests for comment. Others have submitted technical arguments against the removal of buoys and various locations, so let me instead offer a few practical observations.

- A belief that all craft today have modern electronic-only navigational systems, and can always steer into port on GPS, would be naive at best. Our boaters always deeply appreciate the Guard's rescue capabilities and vigilance. Surely that experience, together with your own inspection data, tells you that the recreational fleet is not all new, and is not all kitted out electronically as well as commercial craft or Coast Guard cutters.

Mail donation checks to
RBOC
c/o Otis Brock
1253 Yuba Avenue
San Pablo, CA 94806

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RBOC Comments to USCG

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- Our recreational harbors increasingly host all sorts of personal and unpowered craft, ranging from jet-skis and personal craft who wander outside the breakwaters, to small beach catamarans with minimal kit and propulsion, to racing kayaks rounding an island or open water marker, and a plethora of hybrid craft. Many only have (and the law only requires them to have) very rudimentary navigation tools.
- In California's coastal waters, there's often no absolute division between open ocean waters, inlets, a small calm coastal bay, much larger bays with their own swells, and so on. Like it or not, we have lots of citizens and tourists running craft, even ill-fitted ones, back and forth, inside and outside harbor entrances. We always will, in this state rich in water sports. And they're not all going to have GPS or show up on AIS.
- Personally, a few years ago I was bringing in a small cabin cruiser which we were considering purchasing on its test drive, coming South from Santa Barbara into Ventura. The fog came up fast from the North (as it does there), and the boat's electronic harness partially failed – suddenly we had no GPS and no radar. And absolutely no visibility. What brought my wife and I safely back into harbor was our charted course plot, depth readings, and, importantly, the Ventura Harbor whistle buoy, which we could hear though not see. It's gratitude for our survival, not nostalgia, that moves me to suggest that you should *not* silence all the whistles and remove all the marker buoy lights in most of our recreational harbors statewide.
- At its worst, this deprecation plan seems a bit Darwinian. An airplane pilot trying to land in the fog might be unimpressed, if she were told from the tower that airstrip lights and sound signals were all turned off, and the windsock dismantled ... because now that instruments-only landing is *possible*, we *require* her to use them *exclusively*.

RBOC objects to the proposed mass decommissioning of traditional nav aids, as unlikely to make the waterways safer, and as creating greater risks likely to outweigh whatever benefits are expected from the closures. We request that it be reconsidered as a general policy.

Thank you for your consideration of boater safety for all, even those not surrounded by thousands of dollars of electronics; and thank you for this opportunity to submit our concerns and requests. Please feel free to contact me with any questions at 213.441.2020, or our advocate, Jerry Desmond, at 916.441.4166. Many of our regional boaters would be happy to respond to questions specific to the many affected local harbors, which are listed on the following page. We have boater members in every one. We'd like to see them all able to get back to port safely, every time..

By way of background, RBOC is a non-profit government advocacy organization led by volunteer boaters and sailing leaders from across California, who inform lawmakers of California boaters' needs, and advocate boater positions on legislation and regulations. RBOC has been working since 1968 in advocacy efforts to protect and enhance the interests of the state's three million recreational boaters, and to promote access for all to water sports and recreation. On federal



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Issues, RBOC partners with the nationally-active Boat U.S., but we are independent entities and do not speak for the latter. See <https://www.rbo.org/about> Thank you for your attention.

Sincerely,

James Bryce Clark,
President

cc: Jan Lucas, Commodore, Pacific Inter-Club Yacht Association
Kathy St. Amant, Commodore, Southern California Yachting Association
Jerry Desmond Jr., Esq., Desmond & Desmond

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ExternalAffairs@uscg.dhs.gov

Known affected navigational buoys:

LLNR 455 - Noyo Approach Lighted Whistle Buoy NA
LLNR 2435 - Newport Harbor Entrance Lighted Bell Buoy NW
LLNR 3010 - Long Beach Channel Approach Lighted Whistle Buoy LB
LLNR 3840 - Morro Bay Approach Lighted Whistle Buoy MB
LLNR 490 - Humboldt Bay Entrance Lighted Whistle Buoy HB
LLNR 10 - San Diego Bay Approach Lighted Whistle Buoy SD
Ventura Marina Entrance Lighted Whistle Buoy 2V (LLNR 3675)
Pillar Pt Harbor Entrance Lighted Bell Buoy 3 (LLNR 4140)
San Francisco Main Ship Channel Lighted Bell Buoy 7 (LLNR 4190)
Pillar Pt Harbor Entrance Lighted Gong Buoy 1 (LLNR 4130)
Los Angeles Approach Channel Lighted Whistle Buoy 3 - LLNR 3107
Long Beach Channel Approach Lighted Whistle Buoy LB – LLNR 3010
Redondo Harbor Entrance Lighted Bell Buoy RB – LLNR 3325
Oceanside Approach Lighted Whistle Buoy OC – LLNR 2290
Santa Cruz Lighted Whistle Buoy SC (LLNR 4080)

Tomales Bay Outside Bar Gong Buoy TB – LLNR 8025
Santa Barbara Harbor Lighted Bell Buoy SB – LLNR 3755
Arena Cove Lighted Bell Buoy A – LLNR 415
Bodega Harbor Approach Lighted Gong Buoy BA – LLNR 7765
Port Hueneme Entrance Lighted Whistle Buoy PH – LLNR 3595
Santa Cruz Lighted Whistle Buoy SC – LLNR 4080
Mendocino Bay Whistle Buoy MB – LLNR 440
Little River Bell Buoy LR – LLNR 435
Albion River Lighted Whistle Buoy AR – LLNR 430
Pillar Pt Harbor Approach Lighted Buoy PP – LLNR 330
Oakland Harbor Bar Channel Lighted Bell Buoy 1 (LLNR 4605)
Crescent City Harbor Lighted Bell Buoy 6 (LLNR 8375)
Monterey Harbor Light 6 (LLNR 3970).