APPENDIX F

Scoping Meeting Comment Summary

TABLE OF CONTENTS

LIST OF APPENDICES

ABBREVIATIONS

BCDC	San Francisco Bay Conservation and Development Commission
CEQA	California Environmental Quality Act
CMANC	California Marine Affairs and Navigation Conference
EA	Environmental Assessment
EIR	Environmental Impact Report
LTMS	Long-Term Management Strategy for Placement of Dredged Material in the San Francisco Bay Region
NEPA	National Environmental Policy Act
RDMMP	Regional Dredge Material Management Plan
Regional Water Board	San Francisco Bay Regional Water Quality Control Board
USACE	United States Army Corps of Engineers

1.0 Project Description

The United States Army Corps of Engineers (USACE), as mandated by Congress, has the authority to maintain navigability of federal navigation channels to their authorized depth. Accumulation of sediment that settles in these channels can impede navigability and represent navigation safety hazards. Maintenance dredging removes this sediment and returns the channels to authorized depths to provide safe, reliable, and efficient waterborne transportation systems (channels, harbors, and waterways) for the movement of commerce, national security needs, and recreation.

The San Francisco Bay Regional Water Quality Control Board (Regional Water Board) has authority under Clean Water Act Section 401 and the Porter-Cologne Act to issue permits governing dredge and fill activities. The Regional Water Board will consider USACE's application for a 5-year Water Quality Certification / Waste Discharge Requirements for continued maintenance dredging of San Francisco Bay federal channels and associated dredged materials placement.

The Proposed Project includes the operation and maintenance of 11 federal navigation channels and use of the associated federally-designated or alternate placement sites in and near San Francisco Bay for the next 10 years, anticipated to begin in 2025. The USACE proposes that each federal navigation channel would continue to be dredged as needed, depending on shoaling and available funding. The frequency of dredging would range from annual activities to those that may occur only once during the 10-year planning horizon. The Proposed Project and this Draft Environmental Assessment [EA]/Environmental Impact Report [EIR] build off the previous 2015-2024 EA/EIR and other approved management plans and where appropriate incorporates new information on dredging impacts, including those to newly listed species, and environmental benefits from beneficial use of dredged material (beneficial reuse).

The purpose of the public meeting and comment period identified in the Notice of Preparation (NOP) was to collect comments from the public, organizations, and government agencies on key issues to consider in preparation of the Draft EA/EIR.

2.0 NOP Announcement, Date, & Distribution

The NOP (Attachment A) was released on Tuesday, February 13, 2024, via the USACE and Regional Water Board websites. Additionally, it was distributed through the following email listservs:

Long-Term Management Strategy for Placement of Dredged Material in the San Francisco Bay Region (LTMS), Regional Dredge Material Management Plan (RDMMP), and the Regional Water Board's California Environmental Quality Act (CEQA) list.

The NOP included the project description and a figure of the study area. It provided the date and location of the public scoping meeting, and the methods and timeline for submitting public comments.

3.0 Public Scoping Meeting

The public scoping meeting took place on Tuesday, March 5, 2024, from 4:00-6:00 pm. The meeting was offered in a hybrid format using Zoom for the virtual component and the Regional Water Board office for the in-person option. A PowerPoint slideshow was presented through the Zoom application.

The meeting began with introductory remarks, a review of the National Environmental Policy Act (NEPA)/CEQA, and the meeting purpose by Dr. Tessa Beach, USACE. Khandriale Clark, from the contractor team, then provided an overview of logistics and the meeting agenda. Dr. Arye Janoff then continued with the project background, overview, purpose and need, goals, and project activities. Subsequently, Jazzy Graham-Davis described the Regional Water Board's role; an overview of the environmental analysis/resource areas; means to avoid or reduce impacts; and federal and state agency coordination. Finally, Khandriale Clark explained the NEPA/CEQA schedule and provided information on how to submit comments or find more information. The presentation was given twice, with an opportunity for attendees to ask clarifying questions and/or provide comments on the scope of the project after each run though.

A transcript of the meeting is provided in Attachment B.

Thirty-five participants attended the meeting. Of these, 14 represented the Project Development Team and 21 represented the public/outside agencies:

3.1 Project Development Team

- Regional Water Board: Xavier Fernandez, Jazzy Graham-Davis (in-person), Kevin Lunde (in-person)
- USACE: Tessa Beach (in-person), Ellie Covington, Christopher Eng, Jade Ishii, Arye Janoff (in-person), Jamie Yin
- Stantec: Khandriale Clark, Jamil Ibrahim (in-person), Cynthia Jones
- Scout: Becky Diaz, Ryan Pingree (in-person), Bob Wardwell

3.2 Public/Agency

- Jeff Thomas, AECOM
- Ava Lazor, Alameda County Water District
- Jim Haussener, California Marine Affairs and Navigation Conference (CMANC)
- Chris Huitt, California State Lands Commission
- Deborah Waller, County of Sonoma
- Jessica Blanchette, Haley & Aldrich, Inc.
- James McNally, Manson Construction Co.

- Khamly Chuop, Port of Oakland
- Edwin Draper, Port of Oakland
- Justin Taschek, Port of Oakland
- Fanny Yu, Port of Oakland
- Brenda Goeden, San Francisco Bay Conservation and Development Commission (BCDC)
- Jaime Lopez, BCDC
- Maya McInerney, BCDC
- Nicole Sasaki, San Francisco Baykeeper
- Allison Chan, San Francisco Public Utilities Commission (SFPUC)
- Russ Barnes, Wilshire Consulting Services, LLC
- Jennifer Schulte, unknown affiliation
- Unnamed caller
- Unnamed caller
- All public/agency attendees participated via the virtual meeting (Zoom); no public/agency attendees attended in-person.

4.0 Public Comments

A total of 21 comments were received during the public scoping period.

During the public meeting, eight comments were received from four attendees. Two attendees submitted written comments via the meeting chat; one submitted verbal comments; and one submitted a written comment via a previously-provided Survey Monkey link. An additional 13 comment letters were received via email following the meeting.

These comments are included in the comment matrix in Attachment C.

5.0 Key Issues Identified Through Public Comments

- Eden Landing, "alternative placement site," is in protected Niles Cove Groundwater Basin; Alameda County Water District expressed concerns regarding potential effects of dredged material placement to groundwater quality conditions at the site.
- State and federally listed species in the Bay include longfin and delta smelt, salmon, steelhead, sturgeon, and California least tern. The project may result in takes of state protected fish species. The California Department of Fish and Wildlife requested:
    - an assessment of effectiveness of previous mitigation measures for longfin smelt, and the inclusion of additional measures to further avoid take;
    - inclusion of potential impacts to white sturgeon in the EA/EIR;
    - an assessment of impacts on species, including Pacific herring, from maintenance dredging outside the approved environmental work window; and
    - description of different compensatory mitigation options to offset dredging impacts to listed species under the California Endangered Species Act and the Federal Endangered Species Act, and engagement with the resources agencies when determining options and amounts for compensatory mitigation.
- Galilee Harbor Community Association requested that Sausalito navigation channel be included in the EA/EIR.
- The BCDC provided the following recommendations:
    - BCDC and United States Environmental Protection Agency be included in development and selection of alternatives considered in the Draft EA/EIR.
    - BCDC prefers the use of the term "disposal sites" instead of "placement sites" for dredge material sites within the Bay and offshore.
    - EA/EIR should thoroughly examine the loss of sediment from disposal for both ecological and resilience projects under the no action alternative.
    - Bel Marin Keys Wetland Restoration Site and Eden Landing Wetland Restoration Site should be included in the Draft EA/EIR.
    - The Draft EA/EIR should assess dredging and disposal outside the work window for impacts on listed species and use of hydraulic and mechanic dredging equipment.
    - USACE and Regional Water Board should work with other agencies to maximize beneficial reuse of dredged sediment while minimizing disposal.

  - Include the advanced maintenance dredging at Bullshead Reach in the analysis, as well as investigate ways the USACE can work with others (sand miners) to reduce shoaling without having to widen or deepen Bullshead Reach.
  - Note that there are many factors involved in determining where sediment can be placed. Less than 5 percent of sediment has contaminant levels that prevent some form of beneficial reuse, either as surface sediment or foundation.
  - Explanation requested for why the Jack Maltester Channel is included and the Suisun City Channel is not included in the list of navigation channels shown in Study Area.
  - Cumulative impacts of the USACE maintenance dredging program together with other large projects in the Bay over the next ten years should be evaluated fully in the Draft EA/EIR.

- Blue Water Yacht Harbor, Clipper Yacht Harbor, Richardson Bay Marina, and Sausalito Working Waterfront Coalition requested that Richardson Bay Channel be included in the list of navigation channels covered in the Draft EA/EIR.
- California Department of Conservation, Geologic Energy Management Division, stressed the need to protect abandoned oil and gas wells in the project area.
- Jim Haussener (CMANC) requested that the following federally-authorized navigation projects be include in the EA/EIR, and that there is a mechanism to include any new projects that may be authorized and funded: Islais Creek, Mare Island Strait, Full Channel at Redwood City Creek, Full Channel at Richmond (inner harbor – Santa Fe Channel), and Suisun Slough.
- San Francisco Baykeeper requested that the EA/EIR include the following:
  - A thorough analysis of the impacts of changing the USACE O&M dredging program as compared to the last term, including but not limited to differences in dredged material disposal activities;
  - An assessment of the entrainment monitoring data collected between 2015 and 2024, and consideration of a revised work window;
  - Assessment of adverse direct and indirect impacts to green and white sturgeon, and;
  - A robust analysis of the navigational risks associated with deferring dredging in Pinole Shoal Channel and Richmond Outer Harbor.
- San Francisco Baykeeper requested clarification on whether the Proposed Project includes the Sacramento River Deep Water Ship Channel and/or the Stockton (John F. Baldwin and Stockton Ship Channels.
- California Geologic Energy Management Division requested a shapefile of the purple polygon (placement) sites.

- Manson Construction Co. commented that it is not practical to use turbidity curtains in deep water or water of significant current and that real-time monitoring of turbidity has been effective for reducing/avoiding turbidity impacts.

ATTACHMENT A

Comment Matrix

Commenter Name	Scoping Comment	Response
Laura J. Hidas Director of Water Resources **Alameda County Water District** 43885 South Grimmer Boulevard Fremont, CA 94538 (510) 668-4200	The Alameda County Water District (ACWD) wishes to thank you for the opportunity to comment on the U.S. Army Corps of Engineers (USACE) and San Francisco Bay Regional Water Quality Control Board (Regional Water Board) Notice of Preparation (NOP) of a Draft Environmental Assessment (EA)/Environmental Impact Report (EIR) for San Francisco Bay Federal Channels Operation and maintenance Dredging and Sediment Placement Activities (Project). The Eden Landing Ecological Reserve (Eden Landing) is characterized in the NOP as an "Alternate Placement Site" for the placement of material dredged during operation and maintenance (O&M) activities as part of the Project. Eden Landing is located within the ACWD-managed Niles Cone Groundwater Basin (Niles Cone Subbasin 2-09.001 or Niles Cone). The Niles Cone is located within the cities of Fremont, Newark, Union City, and the southern portion of the City of Hayward. ACWD is identified within the Sustainable Groundwater Management Act (SGMA) as an agency created by statute to manage groundwater and deemed to be the exclusive local agency within its statutory boundaries to comply with SGMA. In addition, ACWD is the Groundwater Sustainability Agency for the Niles Cone and has an approved Alternative to a Groundwater Sustainability Plan. ACWD has reviewed the NOP and offers the following comments for your consideration: 1. Groundwater Protection: The Niles Cone represents a major source of ACWD's water supply; therefore, it is imperative that ACWD protects the water quality and ensures the continued use of the Niles Cone for water supply for ACWD's customers: a. Hazards and hazardous Materials: Page 3 of NOP states, "Before conducting dredging activities under the Proposed Project, the USACE would continue to sample and analyze sediment to determine its suitability for various placement and beneficial reuse alternative based on its physical, chemical, and biological characteristics." The forthcoming EA/EIR should specify the screening levels that will be used to evaluate concentrations of potential contaminants in sediment, as well as a justification for the suitability of those screening criteria. b. Groundwater Well Protection/Destruction: Since 2002 ACWD has worked with the South Bay Salt Pond Restoration Project proponents in identification and the proper destruction of abandoned wells to protect the Niles Cone. A number of identified wells have not been located and records indicate they are within Eden Landing, which is characterized in the NOP as an Alternate Placement Site (hereafter referred to as the "Eden Landing Alternate Placement Site"):	Thank you for your comment. The EA/EIR (Section 1.3.7) will identify the testing requirements for the placement of beneficial use of dredged material. The guidelines are also found in the Regional Water Board's Beneficial Reuse of Dredged Material: Sediment Screening and Testing Guidelines, which is incorporated by reference into this document (Regional Water Board 2019). It should also be noted that this and all potential future placement sites would undergo separate environmental analysis and permitting to allow placement of dredged material.
Alameda County Water District (continued)	ACWD has identified at least ten (10) remaining water wells and one (1) monitoring well located within or near the Eden Landing Alternate Placement Site. i. The monitoring well within the Project limits is owned and monitored by ACWD. Groundwater sampling and monitoring of the monitoring well is imperative to ACWD's management of the Niles Cone. Therefore, ACWD has identified at least ten (10) remaining water wells and one (1) monitoring well located within or near the Eden Landing Alternate Placement Site. ii. Historical records indicate the presence of ten (10) abandoned water wells within the Project area. Although excavation activities are not expected in the area of the well locations, should the wells be discovered during the improvements, ACWD requests to be notified as soon as possible following such a discovery. Any abandoned wells must be properly destroyed in accordance with ACWD requirements. 2. ACWD Contacts: The following ACWD contacts are provided so that USACE and the Regional Water Quality Board can coordinate with ACWD as needed during the permitting process: • Michelle Walden, Groundwater Resources manager at (510) 668-4454, or by email at michele.walden@acwd.com, for coordination regarding ACWD's groundwater resources. • Kit Soo, Well Ordinance Program Coordinator, at (510) 668-4455, or by email at kit.soo@acwd.com for coordination regarding groundwater wells and drilling permits. Thank you for the opportunity to comment on the Project at this time.	Thank you for your comment. The EA/EIR will include specific analysis of dredged material placement at existing placement sites listed in Section 1.5.2. Where possible, potential impacts associated with the use of future placement will be broadly discussed; however, use of these sites, including the potential future site at Southern Eden Landing Ecological Preserve, by the USACE would be conditioned upon completion of separate, site-specific supplemental environmental review under the NEPA and/or CEQA, and acquisition of required environmental approvals from resource and regulatory agencies.

Commenter Name	Scoping Comment	Response
Becky Ota Environmental Program Manager Marine Region **CA Department of Fish and Wildlife** 1123 Industrial Rd. Suite 300 San Carlos, CA 94070	The California Department of Fish and Wildlife (Department) received a NOP from the San Francisco Regional Water Quality Control Board (Waterboard) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.1 Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that the Department, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. **DEPARTMENT ROLE** The Department is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, Section 711.7, subd. (a) & 1802; Pub. Resources Code, Section 21070; CEQA Guidelines Section 15386, subd. (a).) The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Id., Section 1802.) Similarly for purposes of CEQA, the Department is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. The Department is also responsible for marine biodiversity protection under the Marine Life Protection Act in coastal marine waters of California, and ensuring fisheries are sustainably managed under the Marline Life Management Act. The Department is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, Section 21069; CEQA Guidelines, Section 15381.) The Department may need to exercise regulatory authority as provided by the Fish and Game Code. To the extent implementation of the Project as proposed may result in take as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, Section 2050 et seq.), related authorization as provided by the Fish and Game Code will be recommended. Pursuant to our jurisdiction, the Department has the following comments and recommendations regarding the Project. **PROJECT DESCRIPTION SUMMARY** Proponent: United States Army Corps of Engineers (USACE) Objective: The objective of the Project is to maintain navigability of federal navigation channels to authorized depths in San Francisco Bay. Location: The project is located within San Francisco Bay and the Pacific Ocean in Alameda, Contra Costa, Marin, Napa, Sacramento, San Joaquin, Santa Clara, San Francisco, San Mateo, Solano, and Sonoma counties. Timeframe: This Environmental Impact Report will cover anticipated Project activities for a 10-year timeframe from 2025 to 2034. **MARINE BIOLOGICAL SIGNIFICANCE** The San Francisco Bay-Delta is the second largest estuary in the United States and supports numerous aquatic habitats and biological communities. It encompasses 479 square miles, including shallow mudflats. This ecologically significant ecosystem supports both state and federally threatened and endangered species and sustains important commercial and recreational fisheries. **STATE AND FEDERALLY LISTED AND COMMERCIALLY/RECREATIONALLY IMPORTANT SPECIES** Protected species under the State and Federal Endangered Species Acts that could potentially be present near Project activities include: • Longfin smelt (*Spirinchus thaleichthys*), state-threatened, • Delta smelt (*Hypomesus transpacificus*), • Chinook salmon (*Oncorhynchus tshawytscha*), state and federally threatened (Central Valley Spring-run), state and federally endangered (Sacramento River Winter-run), • Steelhead (*Oncorhynchus mykiss*), federally threatened (Central California Coast and Central Valley evolutionary significant units), • Green sturgeon (*Acipenser medirostris*), federal threatened (Southern Distinct Population Segment), • White sturgeon (*A. transmontanus*), state species of special concern, • California least tern (*Sternula antillarum browni*), state and federal endangered.	Thank you for your comment. The EA/EIR will address potential impacts to fish, wildlife, and habitat in the vicinity of proposed dredging activities, including species identified in this comment. Minimization and mitigation measures are incorporated where appropriate.

Commenter Name	Scoping Comment	Response
	Several species with important commercial/recreational fisheries value and habitat value for spawning and rearing could potentially be present near Project activities. These include: • Dungeness crab (*Cancer magister*), • Pacific herring (*Clupea pallasii*), • Rockfish (*Sebastes* spp.), • California halibut (*Paralichthys californicus*) • Surfperches (*Embiotocidae*), • Eelgrass (*Zostera marina*). **COMMENTS AND RECOMMENDATIONS** The Department offers the comments and recommendations below to assist the Waterboard in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document. I. Marine Project Level Impacts and Other Considerations <u>Longfin Smelt</u> Comment: Longfin smelt was listed as threatened under CESA in 2009 (CDFW 2009). Scientists have significant concern with the decline of Longfin Smelt as it is part of the collective decline of pelagic fishes known as the Pelagic Organism Decline (POD) that also includes native Delta Smelt, introduced Striped Bass (*Morone saxatillis*), and introduced Threadfin Shad (*Dorosoma pentenense*). The Pelagic Organism Decline Management Team (POD-MT) was formed by the Interagency Ecological Program (IEP) in 2005 to evaluate potential causes of the decline. The team developed several conceptual models to guide work plan development and integrate results. More information can be found on the Departments website at https://wildlife.ca.gov/Conservation/Fishes/Longfin-Smelt. Entrainment monitoring conducted onboard the federal hopper dredge Essayons since 2014, shows that entrainment is continuing to be documented in both Pinole Shoals and Richmond Outer Harbor channels. Although it appears that some measures the Department recommended during consultation with the Waterboard for the 2014 EIR and subsequent CEQA comment letter have been followed, other recommended measures, specifically adherence to the recommended work window, have not. Recommendation: The Department recommends the Draft Environmental Impact Report (DEIR) include an analysis of the measures that were included in the 2014 EIR and measures provided by the Department in 2014 as a memo at the request of the Waterboard (Attachment 1). The analysis should include which of the measures were successfully implemented, which measures were not implemented, and the reason for the lack of implementation during the previous 10-year period. The DEIR should also consider recommendations provided in the 2015 San Francisco Bay Long Term Management Strategy (LTMS) report, A Study Plan to Seek Solutions to Hopper Dredge Entrainment of Longfin and Delta Smelt (Attachment 2). Recommendation: The Department recommends that the DEIR include additional measures to further avoid the take of Longfin smelt. The measures could be a range of actions and include, but not be limited to, alternatives to suction dredging, a reduction in the amount of hopper dredging in San Francisco Bay, analysis of alternative channels in which hopper dredging may be feasible to avoid take of CESA listed species, alterations to the schedule of dredging activities in San Francisco Bay to remain within the recommended work window, and possible fish deterrents as described in the LTMS report attached. <u>White Sturgeon</u> Comment: White sturgeon is a state species of special concern (SSC). Although the SSC designation does not have a formal legal status, species are designated to bring additional attention to conservation, research, and recovery of species that have previously been subject to population declines or are generally rare. SSCs should be considered during the environmental review process. CEQA (California Public Resources Code §§ 21000-21177) requires State agencies, local governments, and special districts to evaluate and disclose impacts from projects in the State. Section 15380 of the CEQA Guidelines indicates that species of special concern should be included in an analysis of project impacts if they can be shown to meet the criteria of sensitivity outlined therein. Sections 15063 and 15065 of the CEQA Guidelines, which address how an impact is identified as significant, are particularly relevant to SSCs. Project-level impacts to listed (rare, threatened, or endangered species) species are generally	

Commenter Name	Scoping Comment	Response
	considered significant thus requiring lead agencies to prepare an Environmental Impact Report to fully analyze and evaluate the impacts. In assigning "impact significance" to populations of non-listed species, analysts usually consider factors such as population-level effects, proportion of the taxon's range affected by a project, regional effects, and impacts to habitat features. Additionally, the Department received a petition to list White sturgeon as threatened under CESA on November 29, 2023. The Department is expected to complete our review of the petition by April 2024. Information regarding this petition for listing can be found on the California Fish and Game Commission webpage at, https://fgc.ca.gov/CESA?utm_medium=email&utm_source=govdelivery#ws. Recommendation: The Department recommends the DEIR include analysis of the potential impacts to White sturgeon from Project activities. <u>Pacific Herring</u> Comment: The Department has concerns with the amount of dredging that is occurring each year outside of the LTMS environmental work windows, and specifically during the winter Pacific herring spawning season. Dredging in Oakland Inner Harbor occurs yearly outside of the work window through the entirety of the spawning season each year. In addition, channels such as Richmond Inner Harbor, seem to occur on a more frequent basis which has caused conflicts between dredging activities and spawning fish. This has caused dredging to be halted, following other permitting agency conditions of approval and consistent with protocols included in Department issued Pacific herring work window waivers, until after spawning events have concluded. These locations are within the core spawning areas of Pacific herring in San Francisco Bay and dredging during the spawning season may be having impacts to fish each winter dredging occurs (CDFW 2019). Additional impacts from dredging during a sensitive timeframe for a species such as herring, which have seen a decline in overall numbers in San Francisco Bay over the last decade, should be addressed within the DEIR. Recommendation: The Department recommends the DEIR discuss and analyze the known impacts to species from the continued dredging activities outside of the approved LTMS work windows. The analysis should include a description of mitigation measures that would avoid and minimize impacts to species, and specifically directly benefit species such as herring. Mitigation measures should include adherence to the approved LTMS work windows, approaches to modifying current dredging schedules for channels continually dredged outside of the work windows, continue herring observer monitoring requirements, and compensatory mitigation. <u>Monitoring and Mitigation</u> Comment: Entrainment monitoring, and some additional detection surveys, have continued during hopper dredging episodes since 2014 with only a brief interruption due to the COVID-19 pandemic. Monitoring should continue until enough data is available to make informed decisions and create an actionable plan for USACE to implement that would reduce impacts to CESA listed and commercially and recreationally important species. Compensatory mitigation for CESA listed species impacts should continue as a method to offset impacts from suction dredging occurring in San Francisco Bay and its tributaries. Given the continued level of take being documented and non-adherence to some minimization measures such as work windows, compensatory mitigation to fully offset the impacts of the Project has to be described fully in the DEIR. The mitigation calculation used in 2014 is no longer a viable way to calculate mitigation amounts for Projects that have entrainment and impingement impacts. The Department determined that the calculation, based on water volume entrained and subsequent mitigation from the State Water Project, did not translate accurately to projects with lower volumes of water entrained. The DEIR should consider a new approach to calculating the mitigation amount to fully offset the Project's impacts. Recommendation: The Department recommends the DEIR include discussion and analysis of monitoring options, including onboard entrainment monitoring on all suction dredges including cutterhead dredges. Continued monitoring will add to the existing data and assist USACE in making necessary changes to dredging practices that could further reduce or eliminate impacts to sensitive species. Improvements recommended by CDFW in the attached memo and in the attached LTMS report should be considered such as changes to the sampling basket or the addition of a flow meter on the sample basket diversion pipe.	

Commenter Name	Scoping Comment	Response
CA Department of Fish and Wildlife (continued)	Recommendation: The Department recommends that the DEIR describe different compensatory mitigation options to offset dredging impacts to listed species under CESA and the Federal Endangered Species Act. The Department also recommends that the Waterboard and USACE engage with the resources agencies when determining options and amounts for compensatory mitigation to ensure that the DEIR is describing mitigation options based on the recommendations and requirements of each resource agency. ENVIRONMENTAL DATA CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: https://wildlife.ca.gov/Data/CNDDB/SubmittingData#44524420-pdf-field-survey-form. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. FILING FEES The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by the Department. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, Section 753.5; Fish & G. Code, Section 711.4; Pub. Resources Code, Section 21089.) CONCLUSION The Department appreciates the opportunity to comment on the NOP to assist the Waterboard in identifying and mitigating Project impacts on biological resources. Questions regarding this letter or further coordination should be directed Arn Aarreberg, Environmental Scientist, at (707) 791-4195 or R7CEQA@wildlife.ca.gov.	Thank you for your comment. New project surveys of special status species are not currently planned for this EA/EIR.
Bob Boye President, Board of Directors **Galilee Harbor Community Association**	We hope this letter finds you well. Our community association is reaching out to you regarding the navigational channel that runs along Sausalito's waterfront. Our marina is adjacent to this channel, which serves as our entrance. Beyond our role as a liveaboard marina, Galilee Harbor is also home to several small businesses operated by our members. The majority of Galilee's residents fall well below Marin County's Median Family Income limits, and they've worked hard to establish careers chartering boats, boatbuilding, diving and more. Each depends on Sausalito's navigational channel for their livelihood, so its condition is of critical importance. Several local marina operators, boaters, and shipyards have expressed deep concern over being excluded from your proposed Operation and Maintenance Dredging and Sediment project. Collectively, these waterfront businesses create a hive of productivity, employing hundreds of people to build, service, refuel and maintain thousands of vessels throughout the Bay Area and beyond. As larger vessels slowly lose the ability to reach Sausalito's fuel docks, marinas, and shipways for servicing, these employees and their families, including residents of Galilee Harbor, immediately feel the negative economic impact. We humbly request that you advocate on behalf of our working waterfront to include the Sausalito channel in your EA/EIR before it becomes impassable. We thank you for your time, and are hopeful that we can ultimately participate in this important project.	Thank you for your comment. Because it is not a federally authorized navigation channel, the Sausalito channel will not be included as part of the proposed action. See Section 2.4.7 for additional information.

Commenter Name	Scoping Comment	Response
Brenda Goeden Sediment Program Manager **San Francisco Bay Conservation and Development Commission** 375 Beale Street, Suite 510 San Francisco, CA 94105 (415) 3523600	Thank you for the opportunity to comment on the San Francisco Bay Regional Water Quality Control Board (Water Board) and U.S. Army Corps of Engineers (USACE) Notice of Preparation (NOP) of a Draft Environmental Assessment and Environmental Impact Report (DEA/EIR) for USACE's 2025 through 2035 Operations and Maintenance Dredging Program for San Francisco Bay Federal Navigation Channels (USACE O&M Dredging Program), dated February 13, 2024. The Proposed Project includes the operation and maintenance of the 11 federal navigation channels: the deep draft channels - San Francisco Main Ship, Richmond Inner and Outer Harbor, Suisun, Pinole, Oakland, Redwood City, and San Bruno Shoal; as well as the shallow draft channels - San Rafael Creek, Petaluma River, and Napa River, exclusive of the Suisun Slough, and use of the associated federally-designated disposal or alternate placement sites in and near San Francisco Bay for the next 10 years, anticipated to begin in 2025. The USACE proposes that each federal navigation channel would continue to be dredged as needed, depending on shoaling and available funding. The frequency of dredging would range from annual activities to those that may occur only once during the 10-year planning horizon. Dredging activities would be consistent with the 2015-2024 EA/EIR and other approved management plans and where appropriate incorporates new information on dredging impacts, including those to newly listed species, and environmental benefits from beneficial use of dredged material (beneficial reuse). The USACE's current maintenance dredging typically involves four steps: 1) testing for sediment quality and placement suitability determination; 2) removing recently shoaled sediment from the dredging site to restore authorized navigation channel dimensions; 3) transporting the dredged material by barges, hopper dredges, or pipeline to the placement site; and 4) disposing or placing the dredged material at the designated disposal or placement site(s). The USACE would use either hydraulic (hopper or cutterhead dredge) and/or mechanical (clamshell or excavator bucket) dredge equipment for different channels, and may employ knockdowns where necessary and appropriate. Current hydraulic dredging usually involves hopper dredges, or cutterhead suction attached to hydraulic pipelines that convey dredged sediment to a barge or directly onto a placement site. Current mechanical dredging usually involves placing dredged sediment into a barge for transport to a placement site. The USACE proposes to conduct dredging activities within the environmental work windows to the maximum extent practicable and in coordination with regulatory agencies. The USACE proposes to continue to dispose or place dredged sediment at established disposal and/or placement sites. As proposed, disposal and/or placement would be dependent on sediment characteristics. Current dredged sediment placement sites in the San Francisco Bay Area include the existing federally-designated aquatic in-Bay disposal sites SF-9, SF-10, SF-11, and SF-16; the existing federally-designated ocean disposal sites SF-8, San Francisco Deep Ocean Disposal Site (SFDODS), and SF-17; and several permitted and operational beneficial reuse sites, including, but not limited to, SF-17 Ocean Beach, Montezuma Wetlands Restoration Project, and Cullinan Ranch Restoration Project. Additionally, USACE places sediment at sponsor-provided upland sites for the Napa River and Petaluma River. San Francisco Bay Conservation and Development Commission (Commission) staff has reviewed the NOP and provides the following comments and recommendations for consideration and inclusion in the DEA/EIR. The Commission staff notes that the entire proposed O&M Dredging Program activities are located within the San Francisco Bay Coastal Zone, and/or have the potential to affect the San Francisco Bay Coastal Zone. Therefore, the O&M Dredging Program should be evaluated in consideration of the potential effects to the coastal zone, consistent with the federally approved San Francisco Bay Coastal Zone Management Program (SFBCZMP). In addition, the Commission staff recognizes that the Water Board is the state lead per the California Environmental Quality Act (CEQA), but as this is a joint document, both CEQA and the SFBCZMP should be addressed. Further, the Commission anticipates receiving and analyzing a request for consistency concurrence, and the information contained in the EA/EIS may be used to support that effort later in 2024. Comments and Recommendations 1. Coordination and Cooperation The Commission respects the Water Board and USACE position as leads in preparing the CEQA/NEPA analysis for the proposed program. However, as a long-time partner in the Long Term Management Strategy for the Placement of Dredged Material in the Bay Region (LTMS) Management Program implementation, the Commission respectfully requests that the Commission and the US Environmental Protection Agency (EPA), as the other federal sponsor, be included in the alternatives analysis array development. This is important because as each agency retains its authority, the program must be implemented in accord with its laws and policies. Further, the impact of the USACE's eventual selected alternative may have unintended consequences for other dredging projects in the region. Lastly, the selected alternative may result in challenges or opportunities for the LTMS Management Program implementation that will require coordination and cooperation of regulatory and resource agencies, as well as stakeholders. The Commission is seeking alternatives that can be supported by all agencies. Recommendation: The USACE and Water Board coordinate directly with the Commission and EPA in its alternative array development and selection.	Thank you for your comments. The alternatives for this project and NEPA/CEQA process were described and discussed in the April 12, 2024, LTMS Management Committee Meeting. The USACE and Water Board have and will continue to coordinate with BCDC on the proposed action.

Commenter Name	Scoping Comment	Response
San Francisco Bay Conservation and Development Commission (continued)	2. Use of “Placement” and “Disposal” In the project description, the term “placement” is used to describe both beneficial reuse and disposal of dredged sediment. It is important to be clear in language use both for understanding and analysis needs, in accord with the State’s directive to use plain language for public documents. Disposal of dredged sediment is when the sediment is treated as a waste product rather than a resource. The recognized aquatic disposal sites include the Alcatraz (SF-11), San Pablo Bay (SF-10), Carquinez Strait (SF-9), and Suisun Bay (SF-16), as well as the San Francisco Deep Ocean Disposal Site (SFDODS). Each of the in-Bay disposal sites have been shown through modeling to move the majority of the sediment into deep water channels and continue the transport towards the ocean, with some limited sediment depositing on deep water shoals. Sediment disposed at SFDODS is known to take sediment out of the Bay system and deposit it off the shelf. The San Francisco Bar Channel (SF-8) has been described as a disposal site, with some limited beneficial reuse for sand to support the outer coast littoral cell. “Placement of dredged sediment” has generally been used to describe beneficial reuse (or beneficial use) of dredged sediment regionally. The primary beneficial reuse in the region due to both Bay sediment characteristics and need, has been for wetland restoration and enhancement, and thus specific use of the term placement at a beneficial reuse site. Recommendation: Please refer to the in-Bay and SFDODS disposal sites as disposal sites for clarity as they have been authorized and understood as such in the region for decades. Please use “placement” in association with beneficial reuse, or other non-disposal site discussion for clarity in communication. 3. No Action Alternative In a no action alternative, presumably, the USACE would continue to dispose of sediment at the deep ocean disposal site and multiple in bay disposal sites in support of finding the least cost alternative under the federal standard. This alternative would likely exacerbate the loss of sediment for beneficial reuse of sediment for wetland restoration and adaptation, as well as loss of resiliency in the region that natural and nature-based solutions can provided. Recommendation: The Commission staff recommends that the Water Board and the USACE thoroughly examine this alternative and the loss of sediment from disposal for both ecological and resilience projects, and how this practice would cause more loss of sediment over time and the impacts of this loss, not only to the system, but also to the projects that need the sediment for completion. A thorough examination of this alternative can provide the necessary analysis determine what is appropriate for the region, but also to support the development of a comprehensive benefits package to provide to USACE Headquarters to support additional beneficial reuse activities and funding over the ten-year evaluation period.	Thank you for your comment. We appreciate BCDC’s recommendation to improve clarity on use of terms “disposal” and “placement” in this EA/EIR, and references to analyses that show that the majority of sediment at in-Bay sites moves into deep water channels and continues transport towards the ocean, with some limited sediment depositing on deep water shoals. The terminology used in this EA/EIR and application of terms “disposal” versus “placement” is consistent with the August 2023 Memorandum on Expanding Beneficial Use of Dredged Material in the USACE. Disposal is defined as the placement of material in an area where the material is anticipated to remain in place and have no measurable benefit. In open water placement sites, nondispersive sites are considered disposal; in confined placement sites, disposal applies if the material is not intended to be offloaded for another beneficial use. Transitional placement is defined as keeping sediment in the riverine or coastal system as a part of a management process or in a period of transition. In-Bay sites, SF-9 (Carquinez Strait Placement Site), SF-10 (San Pablo Bay Placement Site), SF-11 (Alcatraz Placement Site), SF-16 (Suisun Placement Site), as well as the ocean site, SF-8 (San Francisco Bar Channel Placement Site (SF-8), are currently characterized as transitional placement sites in the RDDMP and this EA/EIR because, as the commenter suggests, the majority of sediment placed at these sites is maintained as part of the system. EA/EIR will include impact analysis from No Action Alternative loss of ecosystem restoration opportunity.
San Francisco Bay Conservation and Development Commission (continued)	4. Additional Beneficial Reuse Sites As mentioned, Bel Marin Keys Wetland Restoration site (BMKWR) is anticipated to accept dredged sediment in the near future and well within the 10-year period being reviewed for the USACE O&M Dredging Program. Because it is an expansion of the Hamilton Wetlands Restoration Project (HWRP) much is understood regarding the potential placement options, likely volume of sediment needed, other details. Understanding the site is still in development a generalized evaluation should be included as a beneficial reuse site and placement opportunity for the federal and non-federal dredging projects. Should the Water Board and USACE include BMKWRP even with general assumptions, it would allow supplemental documents to be effectively executed to support this site efficiently in the future. Similarly, please also investigate the potential to include Eden Landing Wetland Restoration site (ELWRP) in the analysis. It is our understanding that this site is being reconsidered for beneficial reuse (pers. Comm. D. Halsing), and is in the permitting process now. Direct placement for sediment from Redwood City federal channel would be an ideal project matching for beneficial reuse and ecological restoration. As you’re aware, the USACE and the Water Board have been able to consider projects in conceptual development or phasing in the past, and a similar approach could be implemented here. Recommendation: Please include both BMKWRP and ELWRP at a general evaluation level now to support future use of these sites over the next ten years.	Thank you for your comment. The EA/EIR will identify and analyze Bel Marin Keys and Eden Landing (Eden Landing Ecological Reserve) as possible future beneficial use placement sites. As noted in the EA/EIR, these sites will undergo separate environmental analysis. The EA/EIR will analyze the potential impacts to listed species and listed species of concern from the different dredge methods, material transport, and equipment.

Commenter Name	Scoping Comment	Response
	5. Evaluation of Impacts of Dredging Outside the Environmental Work Window While the NOP states that the USACE would work within the LTMS environmental works windows, for several years now the USACE has regularly dredged outside of the work windows for several dredging projects (Oakland, Richmond, Redwood City, San Rafael Creek, most recently) for many months. The EA/EIR should anticipate this practice to continue again in the future unless the USACE can address some of the contracting challenges, and evaluate the potential impacts to both state and federally listed species, and species of special concern. This evaluation should include dredging using different mechanisms (hydraulic and mechanical equipment). Recommendation: Please fully evaluate the impacts of both dredging and disposal outside of the work windows for both state and federally listed and candidate species. Please note, that the State is currently considering listing white sturgeon, and the federal government is in the process of listing longfin smelt.	
San Francisco Bay Conservation and Development Commission (continued)	6. Alternatives Analysis In developing the alternatives for evaluation, the Water Board and USACE should consider the past 10 years of dredging, including contracting methodology, new policies, bids that have been received, funding availability and potential funding opportunities to share the incremental cost, taking full advantage of new guidance from WRDA 2020, contractor availability and ability to start and complete work within the contract parameters, effects on other dredging projects when the contracting or project is extended, or delayed, and other factors that contribute to the regions ability to maximize beneficial reuse and minimizing wasting valuable resources. One of the alternatives should consider whether development of more Section 204 projects, or federal local partnerships on restoration projects that provide resilience and adaptation for the region while minimizing loss of sediment. Recommendation: Carefully and thoroughly review the potential alternatives, working with the agency partners to identify those that maximize beneficial reuse while minimizing disposal. 7. Advanced Maintenance Dredging The USACE has recently requested additional advanced maintenance dredging at Bullshead Reach in Suisun, that includes both deepening and widening the area previously dredged for this purpose. This proposal should be thoroughly evaluated to understand how it may improve the navigability of the adjacent channel, but also impacts to the sediment transport system. The Water Board and the USACE should also consider whether working with one of the sand mining companies to periodically remove sand from this shoal could both support safe navigation and the supply of sand to the construction industry, thus reducing mining in other areas of Suisun and overall impacts to the system. The USACE has a program known as Section 408 that allow miners to work in this regard for the program. Recommendation: Include the advanced maintenance dredging at Bullshead Reach in the analysis, as well as investigate ways the USACE can work with others (sand miners) to reduce shoaling without having to widen or deepen Bullshead Reach. 8. Project Description As described in the project description “The USACE proposes to continue to dispose or place dredged sediment at established disposal and/or placement sites. As proposed, disposal and/or placement would be dependent on sediment characteristics.” It is important to note that there are many factors involved in determining where sediment can be placed. Less than 5% of the sediment has contaminate levels that prevent some form of beneficial reuse, either as surface sediment or foundation.	Thank you for your comment. The USACE and Water Board have and will continue to coordinate with BCDC on alternatives and maximizing beneficial use. The alternatives analyzed in the EA/EIR will be consistent with the alternatives identified in the RDMMP, a companion document to this Draft EA/EIR. See Section 2.2 of the EA/EIR for details on the process and stakeholders involved with developing the alternatives.
San Francisco Bay Conservation and Development Commission (continued)	9. Jack Maltester Channel The proposed program presumably includes dredging and disposal or beneficial reuse of sediment from the Jack Maltester Channel. The Commission staff also notes that the upland disposal site has been closed by the local project sponsor. While this channel has been federally authorized in the past, the San Leandro Marina that is associated with this channel, is no longer functioning, and therefore, a need for dredging does not seem to exist in that area. Conversely, the project description notes that Suisun City Channel is not included in this analysis but does not state why. The Suisun City Channel has a large, functioning marina and an associated upland disposal site provided by the sponsor. Recommendation. Please clarify why the Suisun City Channel is not included in the analysis while the Jack Maltester Channel is, and whether an evaluation of federal economic interest was conducted for both, its findings, and the bases for and relevance of including or not including these channels in this analysis.	Thank you for your comment. Jack Maltester Channel will not be included in this EA/EIR. Suisun Slough will also be removed from the project description.

Commenter Name	Scoping Comment	Response
San Francisco Bay Conservation and Development Commission (continued)	10. Cumulative Impacts Analysis Please note that during the period of this analysis, the Oakland Turning Basins Widening Projects, the Port of San Francisco Piers 39-41 ½ Remediation Project, sand mining in Central Bay and Suisun, and potentially the first phase of the San Francisco Waterfront Resilience Project would be underway. Other projects may also be active during this ten-year period. The cumulative impacts to the Bay resources, water quality and wildlife, as well as equipment availability, and other impacts may be confounding this work. Please evaluate at a minimum how these four large projects would interact or inter-relate with the USACE O&M Dredging Program and the sediment system, including wetland restoration. Commission staff appreciate the opportunity to comment at the scoping phase of this review. Please note, the analysis should include information sufficient to evaluate consistency with the SFB CZMP if the USACE intends to rely on this document for its federal consistency determination. The McAteer Petris Act and the Suisun Preservation Act, and the San Francisco Bay Plan and Suisun Marsh Protection Plan include multiple applicable and enforceable policies that this program would be subject to. Please review those documents to assist your team in ensuring the necessary information is included in this review. If you have questions or would like additional information, please feel free to contact me at 415.352.3623 or via email at brenda.goeden@bcdc.ca.gov. The Commission stands ready to collaborate with the Water Board and the USACE in identify an array of alternatives that meets the needs of all agencies. Thank you for your efforts in this regard.	The cumulative analysis considers all past, present, and reasonably foreseeable projects.
Christopher Lacey Principal **Blue Water Yacht Harbor, LLC** 55 Liberty Ship Way Sausalito, CA 94966 (415) 289-0135	Mr. Graham-Davis: I hope that this email finds you well. I am writing regarding to the impending Maintenance Dredging of the Federal Navigation Channels in San Francisco Bay Project. It has come to my intention that the Richardson Bay Channel (also known as the Marin Ship Channel, Sausalito Canal, Sausalito Canal or Sausalito Channel) is not currently in the Scope of Work for said project, which we feel is a very big mistake and oversight. We respectfully request that the Richardson Bay Channel be included in the Notice of Preparation of a Draft Environmental Assessment/Environmental Impact Report for the San Francisco Bay Federal Channels Operation and Maintenance Dredging and Sediment Placement Activities and ultimately in this project. The maintenance of the Richardson Bay/Sausalito navigational channel is critical because it serves as the primary “highway” for vessels coming into numerous Sausalito marinas, boatyards, The US Army Corps of Engineers Dock, several sanitation pump out stations and Marin County’s only functioning fuel dock. For your information, all of the boatyards, several marinas, several pump out stations and the fuel dock cannot currently be accessed by deep draft vessels outside of high tides. Regarding the pump out stations and the fuel dock, the current conditions can quickly become a public health and safety issue if access is restricted because of a shallow channel. The fuel dock provides fuel to many maritime emergency service providers, including but not limited to Southern Marin Fire Protection District, Marin County Sherriff’s Office, United States Coast Guard, Tiburon Fire Protection District, etc. and the importance of access to sanitary pump out stations is self-explanatory. An increasing number of boaters have been reporting that the navigational channel that runs along Sausalito’s waterfront has become so shallow that vessels with a 6-foot plus draft cannot transit the channel during a low tide. This channel serves over 2,500 recreational vessels in Sausalito, many thousands of vessels from around the Bay Area, and countless vessels from outside the region visiting the Bay Area. The last vestiges of the maritime industry in Sausalito depend heavily upon the maintenance and upkeep of the Sausalito navigational channel. If this channel is not dredged in the near future, the consequences will be disastrous and will likely sound the death knell for Sausalito’s working waterfront. The maritime industry in Sausalito employs over 500 people including boat yard workers, mechanics, yacht brokers, marina employees, fishermen and others in the marine services. Individuals of all socioeconomic backgrounds use the channel for recreational purposes. The channel protects the public welfare, provides recreational opportunities, supports economics in the maritime sector, and is the primary thoroughfare for those seeking maritime services. I’m reaching out to you today to include this in the project scoping for the San Francisco Bay Federal Channels Operation and Maintenance Dredging and Sediment Placement Activities. Thank you in advance for your time in reading this correspondence and I sincerely hope that this grave oversight will be addressed appropriately. Best Regards, Christopher Lacey Principal	Thank you for your comment. As explained in Section 2.4.7, Richardson Bay portion of San Francisco Harbor is dredged infrequently and is not projected to be dredged in the time span covered by this EA/EIR. If federal interest in dredging a channel not included in this EA/EIR is determined at a later date, separate environmental analysis and permitting would be performed for the channel to be added.

Commenter Name	Scoping Comment	Response
Curtis Havel Harbormaster **Clipper Yacht Harbor** 310 Harbor Drive Sausalito, CA 94965 (415) 332-3500	Hello Jazzy, Please include the Richardson Bay Channel (also known as the Marinship Channel, Sausalito Canal, Sausalito Canal or Sausalito Channel) in the Notice of Preparation of a Draft Environmental Assessment/Environmental Impact Report for the San Francisco Bay Federal Channels Operation and Maintenance Dredging and Sediment Placement Activities. The maintenance of the Richardson Bay/Sausalito navigational channel is critical because it serves as the primary “highway” for vessels coming into Sausalito and provides access to Marin County’s only functioning fuel dock at Clipper Yacht Harbor. The fuel dock at Clipper Yacht Harbor currently cannot be accessed by deep draft vessels outside of high tides. This quickly becomes a public health and safety issue because the Clipper Yacht Harbor fuel dock provides fuel to many maritime emergency service providers, including but not limited to Southern Marin Fire Protection District, Marin County Sherriff’s Office, United States Coast Guard, Tiburon Fire Protection District, and more. An increasing number of boaters have been reporting that the navigational channel that runs along Sausalito’s waterfront is becoming so shallow that vessels with a 6-foot draft cannot transit the channel during a low tide. This channel serves over 2,500 recreational vessels in Sausalito, many thousands of vessels from around the Bay Area, and countless vessels from outside the region visiting the Bay Area. The last vestiges of the maritime industry in Sausalito depend heavily upon the maintenance and upkeep of the Sausalito navigational channel. If this channel is not dredged in the near future, the consequences will be disastrous and will likely sound the death knell for Sausalito’s working waterfront. The maritime industry in Sausalito employs over 500 people including boat yard workers, mechanics, yacht brokers, marina employees, fishermen and others in the marine services. Individuals of all socioeconomic backgrounds use the channel for recreational purposes. The channel protects the public welfare, provides recreational opportunities, supports economics in the maritime sector, and is the primary thoroughfare for those seeking maritime services. I’m reaching out to you today to include this in the project scoping for the San Francisco Bay Federal Channels Operation and Maintenance Dredging and Sediment Placement Activities. Attached are two drawings prepared by the United States Army Corps of Engineers depicting the precise location of the subject channel that should be included with the project.	Thank you for your comment. As explained in Section 2.4.7, Richardson Bay portion of San Francisco Harbor is dredged infrequently and is not projected to be dredged in the time span covered by this EA/EIR. If federal interest in dredging a channel not included in this EA/EIR is determined at a later date, separate environmental analysis and permitting would be performed for the channel to be added.
Trey Powell Northern District Deputy **California Department of Conservation** Geologic Energy Management Division 715 P Street, MS 1803 Sacramento, CA 95814 (916) 445-5986	Construction Site Well Review (CSWR) ID: 1012981 Assessor Parcel Number(s): 048090005000, 0067030180, 0067030140, 0067030150, 0067030170, 0067040150, 0067040120, 0067040160, 0067040170, 0067040030, 0067040210, 0067040220, 0067040130, 0067040090, 0090070360, 0090070370, 0090070320, 0090070440, 0090070450, 0090070140, 0090070180, 0090110260, 0090110290, 0090110430, 0090110270, 0090110050, 0090110360, 0090110280, 0090110400, 0090110410, 0090110390, 0090110320, 0090110350, 0090110420, 0090110210, 0090110330, 0090110180, 0090120240, 0090120270, 0090120290, 0090120010, 0090120020, 0090120280 Property Owner(s): State of California Project Location Address: San Francisco Bay California 94612 Project Title: SF Bay Federal Channels Operation and Maintenance Dredging and Sediment Placement Activities Public Resources Code (PRC) § 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, and geothermal wells. The California Geologic Energy Management Division (CalGEM) has received and reviewed the above referenced project dated 3/6/2024. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following well evaluation. The project is located in Contra Costa County, within the boundaries of the following fields: Any Field, Ryer Island Gas, Van Sickle Island Gas CAUTION IS ADVISED WHEN DREDGING NEAR ABANDONED OIL AND GAS WELLS TO AVOID ACCIDENTAL DAMAGE OR COLLISION. CARE SHOULD BE TAKEN TO ENSURE ABANDONED OIL AND GAS WELLS ARE NOT FURTHER BURIED BY DUMPING DREDGE MATERIAL ON TOP OF ABANDONED WELL LOCATIONS.	Thank you for your comment. This information has been added to the EA/EIR - Section 3.5. USACE shall exercise caution when dredging near abandoned oil and gas wells to avoid accidental damage or collision, and shall care to ensure abandoned oil and gas wells are not further buried by dumping dredge material on top of abandoned well locations.

Commenter Name	Scoping Comment	Response
	Our records indicate there are 36 known oil or gas wells located within the project boundary as identified in the application. • Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0 • Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 20 • Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0 • Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 16 The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. There are no guarantees a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantees that such abandonments will not leak. The Division advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations should be provided to the Division in Latitude and Longitude, NAD 83 decimal format. The Division expects any wells found leaking to be reported to it immediately. Failure to plug and reabandon the well may result in enforcement action, including an order to perform reabandonment well work, pursuant to PRC § 3208.1, and 3224. PRC § 3208.1 give the Division the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for reabandonment as: 1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment. 2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be reabandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment. 3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the reabandonment. No well work may be performed on any oil, gas, or geothermal well without written approval from the Division. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. The Division also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR §1723.5 states	

Commenter Name	Scoping Comment	Response
	well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from the Division is required before work can start. The Division makes the following additional recommendations to the local permitting agency, property owner, and developer: 1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, the Division recommends that information regarding the above identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property. 2. The Division recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development. As indicated in PRC § 3106, the Division has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues. If during development activities, any wells are encountered that were not part of this review, the property owner is expected to immediately notify the Division's construction site well review engineer in the Northern district office, and file for Division review an amended site plan with well casing diagrams. The District office will send a follow-up well evaluation letter to the property owner and local permitting agency. Should you have any questions, please contact me at (805) 937-7246 or via email at Trey.Powell@conservation.ca.gov.	
Jim Haussener	I request that the following federally authorized navigation projects be included in the EA/EIR: Islais Creek; Mare Island Strait; Full Channel at Redwood City Creek; Full Channel at Richmond (inner harbor – Santa Fe Channel); and, Suisun Slough. Also, there should be a mechanism to include any new projects that may get authorized and funded because of self-nominations under Section 7001 of the Water Resources Reform and Development Act of 2014. This could include locations such as Ayala Cove, Clipper Cove, or San Francisco Marina. Some of these could be considered O&M dredging under the Long Term Management Strategy for Dredged Material Placement. Respectfully, Jim Haussener	Section 2.4.7 explains why Islais Creek, Santa Fe Channel, and Suisun Slough are not included in the EA/EIR. Redwood Creek (referred to in scoping comment as “Redwood City Creek”) is encompassed within Redwood City Harbor and will be included in this EA/EIR; the Redwood Creek portion was unintentionally omitted in the version of the study area figure provided in the NOP. Mare Island Strait is included as part of the proposed action. If federal interest in dredging a channel not included in this EA/EIR is determined at a later date, separate environmental analysis and permitting would be performed for the channel to be added.

Commenter Name	Scoping Comment	Response
Ken Watsey, Manager **Richardson Bay Marina** 100 Gate Six Road Sausalito, CA 94965 (415) 332-5510	Hello Jazzy - On behalf of Richardson Bay Marina, I would like to urge the inclusion of the Richardson Bay channel in the EIR for the San Francisco Channels, Operation and Maintenance Dredging Activities proposed projects. There are many reasons to support this, not the least of which is to maintain all tide stage access to the only waterfront fuel dock in this part of the San Francisco Bay. They are disappearing at a high rate due to the environmental complexities and expense of retention. This is a significant factor for both recreational and commercial vessels. Additionally, virtually all agency studies and reports for decades have concurred with the importance and value of developing and retaining recreational pleasure boat use in San Francisco Bay and its surrounding areas. The economic and social benefits are innumerable, but access to public waterways at all stages of tide are critical to reap those benefits. The Sausalito waterfront is a major attraction and destination for vessels from all over the geographical area due to the unique combination of waterfront developments, marine facilities, floating home communities, restaurants and other related businesses used by mariners. Access to these has been codified in all public trust doctrines and should be maintained. To avoid redundancy, I will also say I concur with all other points illuminated in the March 6 letter to you from Curtis Havel of Clipper Yacht Harbor.	Thank you for your comment. As explained in Section 2.4.7, Richardson Bay portion of San Francisco Harbor is dredged infrequently and is not projected to be dredged in the time span covered by this EA/EIR. If federal interest in dredging a channel not included in this EA/EIR is determined at a later date, separate environmental analysis and permitting would be performed for the channel to be added.
Nicole C. Sasaki Staff Attorney **San Francisco Baykeeper** 1736 Franklin Street, Suite 800 Oakland, CA 94612 (510) 735-9700	On behalf of San Francisco Baykeeper (Baykeeper) and our more than five thousand members and supporters who use and enjoy the environmental, recreational, and aesthetic qualities of the San Francisco Bay and its surrounding tributaries and ecosystems, we respectfully submit the following comments for consideration by the San Francisco Regional Water Quality Control Board (Regional Board) (lead agency under the California Environmental Quality Act (CEQA)), and the U.S. Army Corps of Engineers (Corps) (lead agency under the National Environmental Protection Act (NEPA)) with regard to the Notice of Preparation (NOP) for the upcoming Environmental Assessment/Environmental Impact Report (EA/EIR) for the Corps' San Francisco Bay Federal Channels Operations and Maintenance (O&M) Dredging and Sediment Placement Activities from 2025 to 2034 (Project). Baykeeper's mission is to defend San Francisco Bay from the biggest threats and hold polluters and government agencies accountable to create healthy communities and help wildlife thrive. Our team of scientists and lawyers investigate pollution via aerial and water patrols, strengthen regulations through science and policy advocacy, and enforce environmental laws on behalf of the public. Baykeeper has an ongoing history of protecting the bed and substrate of the Bay as a limited resource for the public in perpetuity. We have dedicated significant resources to ensuring navigational dredging is conducted in a manner protective of the Bay's water quality. **Sedimentation:** Since the 2015-2024 EA/EIR, the Corps Headquarters has adopted two new policies: 1) increase the beneficial use of dredged material to 70% by 2030, and 2) increase flexibility, including cost sharing, in determining the "Federal Standard" for the Corps' dredging programs. Combined, these two policies have the potential to maximize beneficial reuse of dredged sediment well beyond the Long-Term Management Strategy's (LTMS) goal of 40% beneficial reuse of dredged sediment. The Bay is continuing to experience a severe sediment deficiency, which, combined with rising sea levels, puts the remaining wetlands around the Bay's perimeter at risk of submersion. Instead of shipping dredged material to the ocean for disposal, the Corps needs to prioritize keeping sediment within the Bay's ecosystem. The Project presents an opportunity for the Corps to increase beneficial use and potentially utilize strategic in-Bay placement to help combat the Bay's sediment deficiency. The 2025-2034 EA/EIR must be updated to thoroughly evaluate the impacts of changing the Corps' O&M dredging program as compared to the last term, including but not limited to differences in dredged material disposal activities.	Thank you for your comment. The EA/EIR will include alternatives that would increase beneficial use of dredged material in San Francisco Bay.
San Francisco Baykeeper (continued)	**Biological Resources:** Delta Smelt is a native fish that is only found in the San Francisco Bay-Delta Estuary and is in imminent danger of extinction. The species is listed as threatened under the federal Endangered Species Act (ESA) and endangered under the California ESA. Longfin Smelt is another native Bay fish and, in recent decades, its populations have declined by more than 90%. Longfin Smelt is listed as threatened under the California ESA and the U.S. Fish and Wildlife Service (FWS) has determined that listing of the Bay-Delta population is warranted under the federal ESA. Between 2015 and 2024, the Bay's Delta Smelt and Longfin Smelt populations have continued to decline. Delta Smelt remain at an all-time low, with the Fall midwater trawl abundance index at 0 every year since 2018. In 2021, Baykeeper initiated litigation against FWS for its failure to move forward with formally listing the Longfin Smelt as endangered under the federal ESA.1 On October 7, 2022, FWS published in the Federal Register its proposed rule to list the Longfin Smelt distinct population segment (DPS) as endangered under the federal ESA. Baykeeper expects FWS to issue a final rule for the Longfin Smelt San Francisco Bay-Delta DPS during 2024. Baykeeper notes that in its draft proposed listing, FWS concluded that existing regulatory mechanisms (including the existing Biological	Thank you for your comment. The EA/EIR will address potential impacts to fish species, including delta smelt, longfin smelt, and other sensitive species in the vicinity of proposed dredging activities. Minimization and mitigation measures will be incorporated where appropriate.

Commenter Name	Scoping Comment	Response
	Opinions and state incidental take permits) were inadequate to prevent the extinction of this species. Since the listing status for the Longfin Smelt has changed, FWS must be reconsulted as part of the preparation of the 2025-2034 EA/EIR for the Project. Historically, the Corps has conducted the majority of the O&M dredging in the Bay using two technologies: hopper dredges and mechanical dredges. The Corps has used a third technology, cutterhead dredges, in the Napa River Channel, Petaluma River Channel, and the San Leandro Marina. It is Baykeeper's understanding that the Corps is considering increasing the use of cutterhead dredges in channels that have historically been mechanically dredged. The 2015-2024 EA/EIR contains a single paragraph discussing the impacts from cutterhead dredging on Delta Smelt in the Napa River Channel, Petaluma River Channel, and San Leandro Marina. This analysis relied on limited data from 2006/2007, which found that the risk of entrainment from cutterhead dredging was negligible. The only mitigation measure adopted was to avoid conducting cutterhead dredging when water temperatures are above 22 degrees Celsius, to the extent feasible. If the Corps intends to expand the use of cutterhead dredges in the Bay, then it must update the 2025-2034 EA/EIR to assess whether the mitigation measure identified in the 2015-2024 EA/EIR is sufficient to protect smelt in other parts of the Bay, and if not, identify other mitigation measures needed to ensure impacts from cutterhead dredging are not significant. Dredging with hopper dredges has significant adverse impacts on Delta Smelt and Longfin Smelt, because the fish get sucked into the dredge (i.e., entrained) and are killed. The 2015-2024 EA/EIR included analysis of a 2013 entrainment study conducted by the U.S. Army Engineer Research and Development Center which concluded that up to 29% of the annual population abundance of Delta Smelt, and up to 8% of the annual population abundance of Longfin Smelt, will be entrained by the hopper dredges the Corps proposed to use in its O&M dredging operations in the Bay. Provision 13 of the Regional Board's Clean Water Act section 401 Water Quality Certification for the 2015-2024 Project required the Corps to conduct entrainment monitoring to collect data regarding the entrainment rates for Delta Smelt, Longfin Smelt, and other special status fish species during hopper dredging episodes in the Bay. Below is the Corps' entrainment data for Longfin Smelt that is available to Baykeeper from the period between 2016 and 2019. The Corps discontinued its entrainment monitoring program in 2020 due to the COVID-19 pandemic, and it is unclear to Baykeeper when the Corps resumed monitoring, if at all. **Location** / **Month/Year** / **Number of LFS Entrained** Richmond Outer Harbor (ROH) / June 2016 / 12 ROH / October 2016 / 0 Pinole Shoal / October 2016 / 0 Pinole Shoal / June 2017 / 56 Pinole Shoal / November 2017 / 3 ROH / June 2018 / 0 ROH / October 2018 / 30 Pinole Shoal / August 2019 / 1 The 2025-2034 EA/EIR must include an assessment of the entrainment monitoring data collected between 2015 and 2024. Based on Baykeeper's analysis of the entrainment monitoring data the Corps collected between 2016 and 2019, the Corps recorded more than 100 entrained Longfin Smelt, but the actual number of entrained fish is likely significantly higher. Dredging outside of the work window in June 2016 resulted in the entrainment of more than half of the recorded Longfin Smelt over that four-year period, and roughly a third of the recorded entrainment occurred in October 2018, within the August 1 to November 30 work window. It is no surprise that dredging outside and inside of the work window has resulted in significant adverse impacts to smelt. The August 1 to November 30 work window for smelt established by the 1998 LTMS Programmatic Biological Opinion is the primary mitigation measure relied upon to address impacts to these species. Given subsequent species listings, critical habitat designations, ongoing aquatic species decline, and the advancement of science that have occurred during the past 26 years, that Biological Opinion is now extremely outdated. For example, current science indicates that pre-spawning adult Longfin Smelt aggregate in the Central Bay during spring and summer, including August and September, before moving into the northern estuary (Suisun Bay and western Delta) from October through March. Thus, Longfin Smelt are likely to be present in the Project areas during the August 1 to November 30 work window. In contrast, larval Longfin Smelt are uncommon in the Central Bay between December and March. Therefore, in order to avoid entrainment impacts to pre-spawning adult and young-of-year Longfin Smelt, the work window for the Corps' dredging activities in the Central Bay should be revised to occur between December and mid-February. The Resource agencies must be re-consulted to inform the 2025-2034 EA/EIR's updated mitigation measures for the Corps' O&M dredging.	

Commenter Name	Scoping Comment	Response
	In addition to native smelt, the Corps' O&M dredging can also adversely impact the Bay's sturgeon populations. The southern DPS of Green Sturgeon is listed under the federal ESA as a threatened species, and the entire San Francisco Bay below the mean higher high water is designated as critical habitat for this species, including the Project area. Green sturgeon is also considered a species of special concern by the California Department of Fish and Wildlife (CDFW). The 2015-2024 EA/EIR did not identify a work window for green sturgeon, since the species was presumed to be present throughout the Bay year-round. According to the 2015-2024 EA/EIR, the LTMS agencies were in the process of updating the LTMS Programmatic ESA consultation with the National Marine Fisheries Service to include Green Sturgeon. The 2025-2034 EA/EIR must incorporate the analysis from this updated federal ESA consultation to ensure the adverse impacts to Green Sturgeon are adequately mitigated to not significant. In summer 2022, large sections of the Bay experienced a catastrophic red tide and resulting fish kill. Among the fish most affected were the White Sturgeon, a species with an already dwindling population. In response to this devastating fish kill, at the end of 2023, Baykeeper and partners petitioned FWS to list the White Sturgeon as threatened under the federal ESA.2 At the same time, Baykeeper and partners also petitioned CDFW to list the White Sturgeon as threatened under the California ESA. Both listing processes are currently ongoing, so the 2025-2034 EA/EIR will need to include a robust analysis for this species.	
San Francisco Baykeeper (continued)	Dredging of the federal navigational channels, as well as smaller-scale dredging projects, poses a variety of direct and indirect impacts to White Sturgeon. In 2009, the San Francisco Estuary Institute prepared a study for the Corps regarding Bay dredging impacts on Green Sturgeon. Direct impacts included entrainment from hydraulic dredging, exposure to contaminated sediments, water quality impacts via sediment resuspension and sedimentation, disturbance from underwater noise, and changes to habitat (e.g., bed leveling). Indirect impacts included modifications to prey base, increased occurrence of ship propeller strikes, and predation by invasive species. Impacts to Green Sturgeon are likely amplified for White Sturgeon, because White Sturgeon spend most of their lives in the Bay, whereas Green Sturgeon migrate through the estuary quickly. Thus, the 2025-2034 EA/EIR must assess the adverse impacts to Green Sturgeon and White Sturgeon, as well as appropriate mitigation measures to reduce impacts to not significant. **Marine Navigation:** The 2015-2024 EA/EIR assumed the Pinole Shoal Channel and Richmond Outer Harbor would be dredged annually, and it did not analyze the impacts from deferring dredging to every other year in these channels. Rather, the 2015-2024 EA/EIR included a "qualitative notation," asserting the risk of a navigational hazard (i.e., vessel groundings, allisions, or collisions) was "speculative" and thus did not require a full assessment. However, in response to the Regional Board's inclusion of Provision 10 in the Clean Water Act section 401 Water Quality Certification for the Project, requiring the Corps to reduce hydraulic dredging in the Bay, the Corps decided to dredge Pinole Shoal Channel and Richmond Outer Harbor every other year to save costs – deferring dredging beginning in 2017. These two channels provide ship access to the Bay's refinery corridor, so it is critical these channels are maintained to minimize the risk of navigational accidents and resulting oil spills. The 2025-2034 EA/EIR must thoroughly assess the adverse environmental and navigational impacts of deferred dredging in these navigation channels. In fall 2020, the Port Captain for the Marathon Refinery in Martinez, whose ships access the refinery via the Pinole Shoal Channel, contacted the U.S. Coast Guard to request the Corps conduct emergency dredging in the channel. The U.S. Coast Guard agreed shoaling had created a navigational hazard, and in November 2020, the Corps conducted emergency dredging in Pinole Shoal Channel to remove a significant shoal of sediments that had reduced the navigable width of the channel. Similarly, in summer 2022, the Port Captain for the Marathon Refinery in Martinez again contacted the U.S. Coast Guard to request the Corps conduct additional emergency dredging in Pinole Shoal Channel. However, the U.S. Coast Guard declined this request. It is Baykeeper's understanding that the Corps intends to analyze both annual and bi-annual dredging frequencies for Pinole Shoal Channel and Richmond Outer Harbor in the 2025-2034 EA/EIR. Baykeeper expects this analysis to include a robust analysis of the navigational risks associated with deferring dredging in these channels. Rather than rely on the warnings of third parties to activate emergency dredging, the Corps must conduct its own internal bathymetric monitoring to actively assess the condition of the deferred channel. We cannot continue to risk a catastrophic oil spill on the Bay due to untimely maintenance dredging in these channels.	Thank you for your comment. As commentor suggests, under the No Project Alternative, existing dredging activities and the current dredging program as implemented by USACE would continue irrespective of current federally authorized dredging frequencies for channels. For Richmond Outer Harbor and Pinole Shoal, dredging would occur every other year rather than annually. Effects of the reduced, or lack of, annual maintenance of dredging for Richmond Outer Harbor and Pinole Shoal channels on navigation will be described in this EA/EIR. 33 CFR § 64.31 outlines the factors considered by the U.S. Coast Guard when determining if an obstruction is a hazard to navigation. This determination is crucial because it dictates whether the obstruction needs to be marked or removed to ensure safe navigation in U.S. waters. If the USCG determine that shoaling in a federal channel is a hazard to safe navigation, typically based on USACE condition surveys that are posted publicly, they will request emergency dredging from USACE under the existing MOU between both agencies regarding the mitigation of obstructions to navigation. If USACE San Francisco District pursuant to 33 CFR § 337.7 determines it's an emergency, then it will send a declaration to the USACE South Pacific Division commander and initiate an emergency dredging action to retore safe deep draft vessel navigation or reduce imminent risks to life, health, property or severe economic losses, and potential severe adverse impacts to the surrounding environment.

Commenter Name	Scoping Comment	Response
	Conclusion: In sum, the Corps' 2025-2034 O&M dredging program presents an exciting opportunity to maximize beneficial reuse and keep sediment in the Bay ecosystem. However, the Corps' O&M dredging also presents adverse impacts to several Bay fish on the brink of extinction which must be thoroughly mitigated. Baykeeper thanks the Regional Board and the Corps for the opportunity to comment on the NOP. We look forward to reviewing the 2025-2034 EA/EIR and are available to work with staff to prepare this analysis. Please contact me via email at nicole@baykeeper.org or via telephone at (510) 735-9700 x 110 with any questions or concerns.	
John DiRe Annabelle Joy Craig Merrileess, Board Members **Sausalito Working Waterfront Coalition**	Dear Jazzy Graham-Davis The Sausalito Working Waterfront Coalition is a non-profit organization whose mission is to advocate for the protection and expansion of Sausalito's waterfront industry and culture. Our vision for the future includes an expanded maritime/artist/industrial economic engine that leverages Marinship's history of innovation and fabrication. Marinship is poised to become an innovation and incubation hub focused on resilient technologies that can address the realities of a changing environment. Our coalition is comprised of waterfront property owners, businesses, employees, educators and local, regional and national residents. We are also affiliated with the National Working Waterfront Network. It has come to our attention that the upcoming SF Bay dredging operation will not include the Sausalito navigation channel in Richardson's Bay. Please be aware that this oversight is potentially a significant economic hardship to Sausalito and southern Marin's economy, much of which depends on the maritime industry. Also realize that the Army Corp debris removal operations in Sausalito use this same channel. Please reconsider your decision to exclude Richardson Bay and the Sausalito channel from the dredging plan. Thank you for your attention to this matter.	Thank you for your comment. As explained in Section 2.4.7, Richardson Bay portion of San Francisco Harbor is dredged infrequently and is not projected to be dredged in the time span covered by this EA/EIR. If federal interest in dredging a channel not included in this EA/EIR is determined at a later date, separate environmental analysis and permitting would be performed for the channel to be added.
Nicole C. Sasaki Staff Attorney **San Francisco Baykeeper** 1736 Franklin Street, Suite 800 Oakland, CA 94612 (510) 735-9700	Hello Jazzy - Thanks for yesterday's scoping presentation. I heard someone say the Project will include the Sacramento to Stockton navigational channel, but I'm not seeing that in the NOP. Can you please confirm that the Suisun Bay Channel will be as far east as the Project will go? Thanks! Nicole	Thank you for your comment. This is correct; the EA/EIR will not include the Sacramento River Deep Water Ship Channel or John F. Baldwin and Stockton Deepwater Ship channels. See Figure 1-2 for reference.
Wes Turner Research Data Specialist I **California Geologic Energy Management Division** (916) 529-9814	Good Morning, I am a GIS specialist at GalGEM. I'm assisting Nick Aiello with a CEQA project, title: San Francisco Bay Federal Channels Operation and Maintenance Dredging and Sediment Placement Activities (Proposed Project) I need to make a list of all the parcel polygons shown in the two large areas shown in purple in the attached document. Were those polygons created in GIS? If so, could you send the shapefiles used to me, or put me in contact with your GIS unit? This would greatly help with me ensuring all the needed parcels are selected. Thank you, Wes Hi Jazzy, were you able to locate shapefiles for the Cullinan Ranch and Montezuma areas? Thanks, Wes	The Water Board provided the requested files on March 1, 2024.

Commenter Name	Scoping Comment	Response
Brenda Goeden #1	Brenda Goeden: 1. Will this document cover any advance maintenance dredging? 2. Is the Jack Maltester Channel? There is no marina in which to dredge to currently.	Thank you for your comment. The EA/EIR will not include advance maintenance dredging (see alternative descriptions in Chapter 2). Jack Maltester Channel is not included in this EA/EIR.
Nicole Sasaki, Baykeeper #1	What is the frequency for dredging the navigation channels? Specifically, will the Pinole Shoal channel in Richmond Outer Harbor be dredged annually or every other year?	Thank you for your comment. The EA/EIR will include an analysis of both dredging scenarios for Pinole Shoal. It is assumed that both channels would be dredged every other year under the CEQA No Project Alternative, and every year under the NEPA No Project Alternative.
Jim Haussener	Jim Haussener #1: A clarifying question about which projects are not getting dredged. I believe, Arye, you made a comment about Suisun Slough, and it looked like there might have been some black versus red, and I was thinking about further up into Redwood Creek, as well as Richmond Inner. So which projects, currently, were you not looking at dredging? It looked like perhaps Richardson Bay was listed as being project number 3 which is SF Harbor, which looked like it was in black. It would be nice to know which ones are not included in this process.	Thank you for your comment. The EA/EIR will list the channels that are expected to be dredged during this planning horizon.
Jim Haussener	Jim Haussener #2: I am trying to get some clarification on some of these as to why. In Richardson Bay, there's complaints that boats are running aground. Islas Creek, I've heard from the Port of San Francisco, there's complaints that it needs some dredging. Obviously, Suisun Slough, now that the disposition is over. I met with Congressman Garamendi two weeks ago, and he is still pushing the Mare Island Strait project. So, I'm just wondering what process the Corps went through when they submitted the application to the Water Board for these projects that are authorized, and may not have been dredged for in quite some time, but still are authorized projects, and why they got dropped out. How do we get them back in?	Thank you for your comment. Section 2.5.7 explains why some channels were excluded. If federal interest in dredging a channel not included in this EA/EIR is determined at a later date, separate environmental analysis and permitting would be performed for the channel to be added.
Jim Haussener	Jim Haussener #3: I am the chair of the dredging work group for the San Francisco Harbor Safety Committee. There's a consensus by the membership of the work group that hydraulic dredging is faster, more thorough, provides a more uniform grade, less anchors, less coordination, and safe. I didn't necessarily see it, so we would like to make sure that the safety aspect of that is recognized. One of the problems with Oakland Inner in particular is that there's a lot of coordination to get the dredge and the anchors, primarily the anchors, out of the way. And there have been delays and vessels have not been able to leave because they couldn't get that dredge out of the way. And so the consensus is, from a safety point of view, that we may want to take a look at more hydraulic dredging - not hopper dredging, but hydraulic cutter head dredges. Thank you.	Thank you for your comment. The Draft EA/EIR will address potential environmental impacts associated with alternatives developed through the RDMMP process, including the impacts of different dredge methods. The RDMMP outlines the plan for dredging and dredged sediment management over the next 20 years, starting in 2025, presents a detailed assessment of dredging and placement alternatives for federally authorized navigation channels within the study area, and establishes a regional Federal Standard Base Plan (i.e., the least cost, environmentally acceptable, and technically feasible dredging and placement options across the San Francisco Bay region). Safety and viability of various dredging methods, including hydraulic cutterhead dredges, were evaluated and considered in the alternatives developed for the RDMMP. In addition, hydraulic cutterhead is included as an alternate dredge method in several channels, including in Oakland Harbor, when appropriate.

Commenter Name	Scoping Comment	Response
Brenda Goeden #2	Is this document covering the outer coast and the Sacramento District's channels? I thought it was for SFBay only.	Thank you for your comment. This EA/EIR only covers USACE San Francisco District channels. Refer to Figure 1-2.
Nicole Sasaki, Baykeeper #2	Will the Corps continue entrainment monitoring? I know it is paused due to COVID, but I am unsure whether or not the pause is indefinite.	Thank you for your comment. USACE has reinitiated entrainment monitoring.
Jim McNally, jmcnally@mansonconstruction.com Manson Construction Co.	Subject - Specifying the use of turbidity curtains to protect eel grass beds adjacent to dredge areas. Comment: Turbidity curtains are impractical for use in deep water or water of any significant current. See ERDC Technical note ERDC TN-DOER-E21. Lengthy anchored Turbidity curtains in or near deep draft navigation channels are not effective and not practical due to the risk presented to safe navigation of vessels by the potential for fouling of ships propellors with curtain. Our suggestion is to continue to use light transmittance readings and eel grass survey monitoring to demonstrate protection of eel grass beds and not specify the installation of turbidity curtains as was attempted in the 23' O&M dredging at Oakland and Richmond.	Thank you for your comment. The installation of turbidity curtains will not be specified in the EA/EIR.