Responses to GGPA — Golden Gate Ports Association, letter dated July 19, 1996

1. The purpose of the LTMS EIS/EIR is not to serve as the basis on which specific disposal site decisions and selections are made. Specific disposal site selections will be determined in environmental analysis (NEPA/CEQA) documents prepared on a site-specific and project-specific basis. This LTMS EIS/EIR is a policy EIS/programmatic EIR. The LTMS agencies agree that UWR needs to be environmentally sound and practicable and LTMS is striving to achieve this goal. Please also see the response to BPC comment 1 (7/19/96 letter).

2. The Final EIS/EIR includes a basic description of how the LTMS agencies will manage the transition from current conditions toward Alternative 3. Regarding in-Bay disposal, initial volume limits will be set at a level somewhat greater than the average amount of material generated by all maintenance dredging activities over the last several years. The in-Bay disposal volume limit will then decrease steadily (every 3 years; see section 6.5.2), but will not begin to drop below the recent historical average maintenance dredging volume until approximately 6 years have elapsed. This approach ensures that in-Bay disposal volumes will predictably decrease, while providing dredgers time to evaluate potential alternatives and to plan for the future. In addition, the in-Bay disposal volume limit includes an allocation set aside for "small dredgers" as defined in the EIS/EIR, which will not decrease over time. In addition, please see the response to BDAC comment 2.

3. Please see the response to BDAC comment 4.

4. Please see the responses to BDAC comment 6, BPC comment 1 (7/19/96 letter), and Oakland comment 11.

5. Sediment quality testing needs and roles are issues common to all alternatives. Therefore, the EIS/EIR extensively discusses sediment quality testing in Chapter 3, including its scientific and regulatory bases, its role in decisionmaking, and opportunities for streamlining testing requirements. Please also see the response above to BDAC comment 5 and BPC comment 3c.

   Current interim in-Bay testing guidelines represented by PN 93-2 will be revised either as a result of finalization of the proposed EPA/USACE national testing guidance document (the "Inland Testing Manual"), or as a result of regional guidance to be developed as part of a Regional Implementation Manual (RIM). In either case, the LTMS agencies have committed to holding workshops to discuss sediment testing, and to circulating the Draft RIM for public comment. In addition, a comprehensive sediment classification framework is proposed in the Final EIS/EIR.

6. Statement noted. Please see the responses to BDAC comment 6 and BPC comment 1 (7/19/96 letter).

7. Statement noted.

8. Please see the response to BPC comment 18.

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July 15, 1996

Ms. Karen Mason
LTMS Coordinator
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: Response to the LTMS EIS/EIR

Dear Ms. Mason:

In 1990, the LTMS agencies were tasked to select the overall long range approach that is to be used to develop a detailed management plan. The interested parties have been working diligently on this study; however, six years have elapsed only to find us submitting comments on a draft plan whose purpose is to determine an approach to develop a management plan. 1

The need to dredge is now. The planning process must be accelerated. We urgently need a management plan that provides definitive answers (1) on how the material will be dredged and (2) where it will be placed. These answers should be determined with consideration for environmental impacts and economic practicability. 2

Dredged Material Disposal Sites

The study provides analysis for three disposal types: (1) in-bay disposal, (2) ocean disposal, and (3) upland disposal. The LTMS raises concerns from our industry about the escalating costs of maintenance dredging when using each of these disposal sites. 3

(1) In-Bay Disposal 4

The LTMS should identify the existing conditions of the disposal site and the future demands for dredging. Forecasting the future maintenance needs for the Ports servicing the Alcatraz site is necessary from an LTMS Plan to properly determine how to plan, monitor, and maintain the site's potential. The existing disposal plan fails to recognize the economic impact of dredging. Currently, the Alcatraz disposal site is the primary location for in-bay disposal. Mechanical dredges (bucket dredges) are no longer competitive when dredging material placed in the Alcatraz disposal site due to production restrictions placed by the Army Corps of Engineers. There is a production restriction of 150,000 cubic yards of dredge material placed in this disposal site over a thirty day period. Any medium sized mechanical dredge

4 or larger performing maintenance dredging can perform 150,000 yards of dredging in half a month. Therefore, the dredge will shut down for the remaining half a month and incur costs to "lay-up" the dredge and send the dredge personnel home. This intermittent production cycle is not cost effective to perform dredging.

An alternative that was suggested years ago by the BCDC involves dredging the mounded material from the Alcatraz disposal site on an "as needed" basis. The mounded material from Alcatraz would be dredged and then towed to the ocean disposal site. A tipping fee can be charged for all material disposed at the Alcatraz site. This will establish a fund for the mound dredging at Alcatraz.

5 (2) Ocean Disposal

The ocean disposal site currently being reviewed is approximately a 50 mile trip to sea. The equipment required to tow the material to the ocean disposal site must be specifically designed and built to withstand the seas encountered in the Pacific Ocean. The barges that are currently employed are approximately 300 feet long by 56 feet wide. These scows are designed to carry large quantities at great distances. The cost to build these barges and the associated cost of the large tugs required to tow them place smaller and shallower projects at risk of meeting the economic justification.

The ocean going barges draw 18-20 feet of water. The small dredging projects which typically require dredging to depths of 12-15 feet. The dilemma is obvious. The large barges are built to withstand heavy seas and require water depths of 18-20 feet, which exceeds the draft limitations of the small dredging projects. An alternative may be to hydraulically dredge the material and pump to the barges anchored in an area of deeper water. Once they are fully loaded, the materials will be towed to the offshore disposal site. This is expensive and not usually an environmentally popular means of dredging. Finally, the hopper dredges, used by private industry and the government, will also have dramatic cost increases due to the long sailing distances required to place this material in the offshore disposal site.

6 (3) Upland Disposal

The cost of acquiring the upland disposal site and securing the permits and approvals can be quite expensive. The non-Corps participants will require changes to the law where the federal government takes on a larger share of the cost. The

upland disposal sites require considerable costs to prepare for receiving the dredge material. Dikes must be built, weirs have to be installed, and in some cases approach channels must be dredged. In the past, when utilizing upland disposal sites, the equipment used was a mechanical dredge. A barge is loaded and transported to the upland disposal site where the material is off loaded by hydraulic means and pumped to the upland disposal site. Typically it requires a large project to justify the cost to mobilize and set up the various equipment required for this type of operation. Where there is a large number of smaller projects, the plan should consider "bunching" these projects together to defray the mobilization and set up costs. 6

The hopper dredge is another type of dredge that is typically used on these projects. The hopper dredge's mode of operation is to dredge the material, store the material on the ship, transport the material to the upland disposal site, and by its own means pump the material from the vessel to the upland disposal site. A critical factor in determining the cost in this method of operation is the distance the hopper dredge must travel from the dredge site to the unloading site. Therefore, the identification of an upland disposal site that is centrally located to the proposed hopper dredge projects should be considered.

The upland disposal site should also have a minimum of 25 feet of water for the vessels to approach the disposal site as closely as possible in an attempt to minimize the distance the material is pumped.

In summary, with the ever tightening budget constraints placed on the Corps of Engineers, it is imperative that the LTMS agencies include the dredging industry representatives to assist in identifying the costs associated with the various alternatives. 7

Sincerely,

GREAT LAKES DREDGE & DOCK CO.

Daniel L. Hussin
Vice President