

cc: Steven Scholl, California Coastal Commission
Todd Cockburn, Public Utilities Commission
Don Munakata, San Francisco Public Works
Dave Jones, San Francisco Public Works
David Radke, San Francisco Public Works
Don Kingery, CH2M-Hill Consultants, Inc.

Responses to the City and County of San Francisco, letter dated June 17, 1996

1. Although sand movement throughout the Bay and nearshore system is not well understood, it seems reasonable to expect that the San Francisco Bar may represent the largest direct supply of sand to Ocean Beach. The LTMS agencies do not intend at this time to change disposal practices for the San Francisco Bar Channel. Sidecast of material from the San Francisco Bar Channel will remain the same under the LTMS policies. The disposal site closest to Ocean Beach is the Alcatraz disposal site, where most material disposed of there is not sandy material.
2. Statement noted; please see the response to City/County of San Francisco comment 1.
3. Statement noted. We agree the sand transport should be studied, but dredged material disposal is only one, probably very small, component of the system. For example, sand miners remove sand now from the Bay. Sand transport mechanisms have been and will continue to be considered in policy regarding Bay dredging. See the response to City/County of San Francisco comment 1.
4. The LTMS agencies do not intend at this time to change disposal practices for the San Francisco Bar Channel. Please see the response to City/County of San Francisco comment 1.
5. Statement noted. Please see the response to City/County of San Francisco comment 1.

Water Agency

County Administration Building
Nine Street
Door, North Wing
San Francisco, California 94553-1229

Contra Costa County



Board of Supervisors
(Ex-Officio Governing Board)

Jim Rogers
1st DISTRICT
Jeff Smith
2nd DISTRICT
Gayle Bishop
3rd DISTRICT
Mark DeSaulnier
4th DISTRICT
Tom Torlakson
5th DISTRICT

Ms. Karen Mason, Coordinator
LTMS EIS-EIR
Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

July 18, 1996

Dear Ms. Mason:

This letter is to inform you that Contra Costa County will be providing comments on the Long Term Management Strategy for the Placement of Dredged Material Disposal in the San Francisco Bay Region. We are interacting with several Departments within the County, and subsequently, completion of the work will take us past the July 19, 1996 due date. 1

Therefore, we are submitting this letter for use as a placeholder and to indicate our interest until such time as our comments can be completed. Comments will be provided within two weeks. We understand that the NEPA process allows for the incorporation of all comments in the spirit of full public discussion of the issue at hand.

Thank you for your patience in this matter.

Sincerely,

Roberta Goulart
Executive Officer

Responses to the CCCWA — Contra Costa County Water Agency, letter dated July 18, 1996

1. Statement noted.

Water Agency

County Administration Building
1000 Broadway Street
San Francisco, North Wing
San Francisco, California 94553-1229

Contra Costa County



Board of Supervisors
(Ex-Officio Governing Board)

Jim Rogers
1st DISTRICT
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4th DISTRICT
Tom Torlakson
5th DISTRICT

Ms. Karen Mason
LTMS Coordinator
Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

July 19, 1996

Dear Ms. Mason:

Contra Costa County and the County Water Agency offer the following comments on the Long-Term Management Strategy (LTMS) for the Placement of Dredged Material in the San Francisco Bay Region Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR). Thank you for the opportunity to comment on this document.

The ongoing LTMS process has been and is a great effort which we hope will allow us to move beyond the problems plaguing dredging and disposal projects in the Bay Area. However, we are concerned that the policy/programmatic DEIS/EIR may go too far in specifying policy detail and guidelines which may have the impact of limiting options for dredging projects in the future. As a programmatic document, the DEIS/EIR should outline the many options and opportunities available, as well as delineating problem areas. But additional scientific basis is necessary prior to specification of the kind of policy decisions contained in this document, particularly as these policies relate to upland disposal, sediment testing protocols, and disposal limits. Much work needs to be done in these areas before specific policies can be considered. Most importantly, many of the specifics with which the programmatic DEIS/EIR attempts to deal, are more appropriate to the specific review required by NEPA and CEQA at the project level of detail. And lastly, we are concerned that selection of a preferred alternative with percentage disposal limitations may curtail the range of options available, resulting in the same sort of disposal problems experienced in the recent past.

For example, upland disposal sites are not specified in the DEIS/EIR, yet the document attempts to detail site management and monitoring plans. These details should be included in the site-specific level of environmental review. Contra Costa County has historically supported upland disposal and the beneficial reuse of dredged materials in general. But, the County does not wish to see this disposal method mandated when other alternatives may be more appropriate, when

5 | cost-sharing provisions are not yet in place, or when this disposal method is not cost-effective for other reasons. As a result, it would be premature to determine maximum disposal limits. We understand that the LTMS advocates upland disposal/reuse, yet no mechanisms exist at the federal level to facilitate funding or selection of this option, and economically many questions remain to be resolved. It is important at this juncture to maintain flexibility in terms of disposal options if we are to facilitate dredging and disposal in a timely manner. Therefore, if a preferred alternative is required, the County would suggest a preferred alternative which discounts no disposal options and has no disposal limits at this time.

6 | Testing protocols need to more accurately reflect complex local environmental conditions in order to adequately consider changes to that environment. The County understands that many sediment tests taken at considerable expense have been less than effective at determination of the effects of a dredging project. Test protocols need to be revamped to reflect a dynamic and changing Bay-delta ecosystem.

7 | Contra Costa County appreciates your attention to our concerns, with the hope that the LTMS agencies will embark upon further study to obtain the necessary detail and scientific basis to enable sound policies which allow dredging in a timely, economic and environmentally safe manner. Use of the DEIS/EIR as a guidance tool, coupled with the specifics contained in the project level environmental reviews will provide the complete prescription for sound dredging and disposal practices.

Thank you for your consideration of our concerns.

Sincerely,



Roberta Goulart
Executive Officer

Responses to the CCCWA — Contra Costa County Water Agency, letter dated July 19, 1996

1. Statement noted. Please see the response to Krone comment 3.
2. Statement noted. Please see the response to Krone comment 3.
3. Statement noted. Please see the response to Krone comment 3.
4. Statement noted. Please see the response to City of Foster City comment 5 above. Please note that the percentages in the alternatives are long-term targets and will not be strict limitations from year to year. Please see the response to CCCWA comment 5 below, and the new discussion of the transition to Alternative 3 (section 6.5).
5. Site management and monitoring plans will be addressed in more detail in the LTMS Management Plan. Management and monitoring plans would be tailored to each specific project and addressed during the site-specific NEPA/CEQA process.

Upland/wetland reuse (UWR) can only be done when it is practicable. The practicability of UWR will be evaluated for each disposal project and the Management Plan will be updated as new multi-user sites become available. Clean Water Act 404(b)(1) Guidelines (40 CFR Part 230) would establish practicability standards for UWR.

No specific regulatory disposal limits are set for the three disposal environments. However, the preferred alternative sets the long-term goals of 20 percent disposal in-Bay, 40 percent in the ocean, and 40 percent at UWR sites. These goals are different from regulatory limits because they will be expected to be reached on average over several years. Quantities of dredged material disposed or reused in a particular disposal environment may be under or over these goals in any particular year. However, regulatory disposal limits have been or would be set for specific disposal sites (i.e., SF-DODS and Alcatraz). Note that even these site-specific regulatory disposal limits are not set to immediately achieve the long-term goal for the in-Bay disposal environment. For example, the annual limit at SF-DODS was originally set at 6 million cubic yards per year. Due to reduced dredging, due in part to military base closures, EPA reduced the annual limit to 4.8 million cubic yards. This volume represents 80 percent of all dredged material assumed to be generated on average in the Bay area each year (or 100 percent of all SUAD material assumed to be generated in an average year). Combined with remaining allowable in-Bay disposal volumes (even though the in-Bay volumes will be lower than in the past), more than sufficient capacity should be available for aquatic disposal, even if no new UWR capacity becomes available for many years. Please see the "transition" discussion in section 6.5 of the EIS/EIR.

6. The practice of referenced-based testing, as described in section 3.2.5.1, is appropriate for dynamic and changing environments. Reference samples reflect local conditions at each aquatic disposal site and allow a more accurate comparison between project test results and local aquatic conditions at the time. More information on referenced based testing is provided in section 3.2.5.
7. Statement noted.



**CONTRA COSTA
WATER DISTRICT**

1331 Concord Avenue
P.O. Box H20
Concord, CA 94524
(510) 688-8000 FAX (510) 688-8122

July 19, 1996

Directors

Joseph L. Campbell
President

James Pretti
Vice President

Elizabeth R. Anello
Bette Boatman
Noble O. Elcenko, D.C.

Walter J. Bishop
General Manager

Ms. Karen Mason
LTMS EIS Coordinator
c/o U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street, (W-3-3)
San Francisco, CA 94105-3901

Subject: Comments on Draft EIS/EIR for LTMS for the Placement of Dredged Material in the San Francisco Bay Region

Dear Ms. Mason:

Thank you for the opportunity to review and comment on the Draft EIR/EIS for the Long-term Management Strategy (LTMS) for the Placement of Dredged Material in the San Francisco Bay Region, dated April 1996. The main focus of the LTMS is to reduce the amount of dredged material placed into the San Francisco Bay and increase upland disposal of the material, with an emphasis placed on reuse or other beneficial uses of the dredged material. The Contra Costa Water District ("District") has reviewed the document, and this letter transmits comments of the District, as you requested in your June 5, 1996 letter.

The District supplies water to 400,000 residents of central and eastern Contra Costa County. The principal source of our water supply is Rock Slough, located in the southeast Delta. We are very concerned about the water quality in the Delta because it directly supplies our customers' water needs. Any impacts to water quality in the region should be avoided and/or mitigated for, as necessary. 1

In general, the District is supportive of environmentally preferable methods of disposing of dredged material from the Bay-Delta. We are involved in a number of programs to help restore the fisheries and ecosystem of the region. Actions that improve the ecosystem of the Bay-Delta help not only the environment but also all users of Bay-Delta water. 2

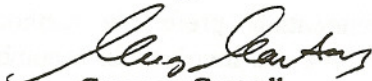
2 We are concerned, however, about the potential water quality impacts to our District. As is noted in your document, upland disposal of dredged material has the potential to impact surface and groundwater quality around the disposal area. As the draft EIR/EIS points out on page 3-70, surface water quality may be effected by return effluent during initial filling, rainwater runoff, or seepage into adjacent waters. Much of the dredged material, as the document points out, contains metals and other constituents that can impair the quality of water in the Delta. Only material dredged from clean sites, free from metals and other pollutants, should be considered for placement within the Delta. Before a site is chosen for upland disposal, an analysis of potential water quality impacts to the District should be completed, to ensure that our water quality is not degraded by this project.

3 The LTMS is a long-term plan that includes placement of some of the dredged material to strengthen some of the levees in the Delta. As you are probably aware, CALFED is in the process of examining different solutions to the fix many of the Delta's problems. Some of their alternatives include removing, strengthening, and adding levees to the system. The LTMS should coordinate its activities in the Delta with CALFED and be adaptive enough to change should CALFED significantly modify the Delta.

We are pleased with the cooperative efforts that the multi-agency task force has shown in preparing the draft LTMS. We are confident that an environmentally beneficial plan will be completed that does not impact the drinking water quality of the Delta.

Thank you for considering our concerns in the matter. If you have any questions, you may contact Dr. Richard Denton, the District's Water Resources Manager, at (510) 688-8187.

Sincerely,



Gregory Gartrell
Director of Planning

WJH/GG

Responses to the CCWD — Contra Costa Water District, letter dated July 19, 1996

1. Statement noted. Section 3.2.5.2 provides information on the testing currently required for upland disposal. Upland testing focuses on eliminating the possibility of contaminants becoming soluble and mobilizing into groundwater or surface water. As the basis for establishing regulatory guidance more specifically tailored to dredged material placement in upland environments, the LTMS agencies have developed a draft comprehensive Sediment Classification Framework. This draft Framework, located in Appendix F, describes the suitability of dredged material for different kinds of disposal options, based on degree of contamination. Under this system, the least contaminated material may be used for a variety of disposal options while more contaminated material must receive special handling. All material used for levee maintenance and stabilization in the Delta region will need to meet water quality criteria established and enforced by EPA and the CVRWQCB.

2. Statement noted. Please see the response to CCWD comment 1.

Such analyses would need to be conducted on a project-specific basis as mandated by both CEQA and NEPA.

3. The Final EIS/EIR addresses the coordination of LTMS with the CALFED program (see new section 2.2.5 in the Final EIS/EIR). Updated estimates of the potential uses for dredged material in the upland environment, particularly in light of the CALFED program and increased potential uses in the Delta, have been provided.

COUNTY OF SONOMA
PERMIT AND RESOURCE MANAGEMENT DEPARTMENT

2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 527-1900 FAX (707) 527-1103

Field Operations / Code Enforcement / Permits / Environmental & Comprehensive Planning

July 9, 1996

Ms Karen Mason, LTMS EIS Coordinator
c/o US Environmental Protection Agency
Region 9
75 Hawthorne Street, (W-3-3)
San Francisco, Ca 94105-3901

Subject: LTMS Draft EIS/EIR

Dear Ms. Mason,

Thank you for the opportunity to comment on the Draft Policy EIS/EIR for the proposed Long Term Management Strategy (LTMS) for dredging and dredged material disposal in the San Francisco Bay and Delta.

As we understand it, the project proposes to rely to a much greater extent upon Upland-Wetland reuse and less upon Aquatic Disposal than is the practice today. The project also includes "Policy-Level Mitigation Measures" which would be applied to each disposal project in order to reduce or eliminate potential significant adverse project impacts. These measures include:

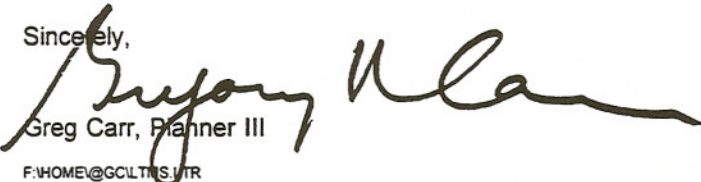
1. Material suitability and sediment quality testing.
2. Site management and monitoring.
3. Ongoing review of dredging needs.
4. Formal coordination of dredged material management.
5. Air quality analyses.
6. Other measures that would apply depending upon the specific site or method of dredging and disposal.

Sonoma County supports the agency's coordinated approach to solving the significant problems associated with bay dredging and disposal so that the necessary shipping channels, ports and other related facilities remain functional. We are hopeful that the adopted policies will encourage beneficial and safe reuse of dredged materials. | 1

While we realize that this policy document cannot anticipate all future projects, the likely increase in upland disposal could result in an increase in disposal projects within Sonoma County. Therefore, future projects should be formulated to meet locally adopted goals, objectives, and policies for environmental and resource protection, land use, and open space. In that light, we request that Sonoma County be provided an early opportunity to review and comment upon any proposed dredging and/or disposal project which could affect Sonoma County. | 2

Thank you in advance for your consideration. Please feel free to contact me at 707-527-1944 if we can be of any further assistance.

Sincerely,


Greg Carr, Planner III

F:\HOME\@GCLTMS\JTR

Responses to Sonoma — County of Sonoma, Permit and Resource Management Department, letter dated July 9, 1996

1. Statement noted.
2. Statement noted. As the response to SC-LPC comment 3g states, the need for consistency with regional habitat plans (as well as any other local plans that require approval) is reflected in Tables 5.1-2 through 5.1-4. These tables identify issues that should be addressed during project-specific reviews. In addition, as discussed in the responses to other comments, the LTMS is not a finite program. Rather, it is ongoing and designed to allow for management updates based on the availability of information. This would include data derived from any ongoing or future wetland restoration studies and efforts in the North Bay.

Such review would need to be conducted on a project-specific basis as mandated by both CEQA and NEPA.

Letters from Ports and Marine Associations

GENERAL CHAIR
James Herman
President Emeritus, ILWU



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James A. Vohs
Ret. Chairman
Kaiser Permanente

July 19, 1996

Ms. Karen Mason
LTMS Coordinator
c/o EPA Region 9
75 Hawthorne Street
San Francisco, Ca. 94105

Subject: Comments on the Long Term Management Strategy (LTMS) for the Placement of Dredged Material in the San Francisco Bay Region Draft Policy Environmental Impact Statement/Programmatic Environmental Impact Report (DEIS/EIR)

To the LTMS Agencies:

This letter is in response to your request for comments on the proposed policy alternatives for the placement of dredged material and, in particular, on a policy approach that transitions over time from Alternative 1 (which emphasizes aquatic disposal of most material in the in-Bay and ocean sites, with relatively limited upland/wetland reuse) to Alternative 3 (which emphasizes a balance between ocean disposal (40%) and beneficial reuse at upland/wetland sites (40%), with limited in-Bay disposal (20%).

The delays experienced by the Port of Oakland in its effort to deepen its channels to 42' in addition to delays in implementing routine maintenance dredging suffered by many other deep-draft dependent industries at other Bay Area ports and marinas prompted the formation of the Bay Dredging Action Coalition in 1991. A large group of maritime and other employers, labor organization, ports, community-based organizations, recreational boaters and others committed to maintaining San Francisco Bay as a center of international commerce joined together to shape public policy and foster political leadership in support of timely, cost-effective and environmentally-appropriate

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SUPPORTING ORGANIZATIONS (partial list)

A.N.Z.D.L. American Waterways Operators American President Companies Arco Products Company Arthur Andersen & Company Bank of America Bay Planning Coalition Benicia Industries Bickard Cove Marina California Association on Public Transportation California Trucking Association California Labor Federation, AFL-CIO California Marine Parks & Harbor CERT Chevron USA Clipper Yacht Harbor The Clorox Company	COLAB Consolidated Freightways Inc. Contra Costa Council Crowley Maritime Corp. DEEP Encinal Terminal The Gap, Inc. GATX Terminals Corp. ILWU International Interdenominational Ministerial Alliance K-Line America, Inc. Kaiser Permanente Latitude 38 Levin Richmond Terminal Corp. Maersk Pacific Ltd. Marin Tug & Barge	Marine Terminals Corp. Master Contracting Stevedore Association Matson Navigation Company Mitsui O.S.K. Lines Nedoyd Lines, Inc. Neptune Orient Lines Ltd. New United Motor Mfg. Co. No. Calif. Marine Assoc. NYK Line Oakland Chamber of Commerce OOCL (USA), Inc. Ortiz International Pacific Gas & Electric Pacific Inter-Club Yacht Assoc. Pacific Maritime Association Pacific Merchant Shipping Assoc. Paktank Corporation	Paradise Cay Homeowners Paramount Export Company The Pasha Group Peninsula Marina Port of Oakland Port of Sacramento Port of San Francisco Post Newspapers San Francisco Custom Brokers & Freight Forwarders San Francisco Chamber of Commerce San Francisco Bar Pilots Santa Fe Railroad Schnitzer Steel Sea-Land Service Southwest Marine, Inc. State Board of Pilot Commissioners	Steckler Pacific Stevedoring Services of America Strawberry Recreation District Tidewater Sand & Gravel Time Oil Company Tosco Refining Company Trans Pacific Container Service Transamerica Corporation TransBay Container Terminal United Auto Workers Viking Industrial Corporation Westar Marine West Oakland Commerce Association Yusen Terminals Inc
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dredging, and to provide accurate information to the public on its economic importance. 100,000 jobs and a \$5.4 billion maritime industry is at stake.

Our most earnest political action efforts in the last three years have been focused on ways to bring upland disposal sites on line. We are on record as supporting language in the federal Water Resources Development Acts to provide consistent federal/local cost-sharing for all disposal methods including upland and to credit the wetland values in the cost sharing formulas that apply to navigation projects when dredged material is beneficially reused. Furthermore we are very proud of our efforts to help make the Sonoma Baylands Wetland Restoration a reality and have actively supported the creation of the wetland restoration/dredged material disposal site at Montezuma Slough in Solano County.

1 We very much support the concept of the beneficial reuse of dredged material, but we cannot agree with such a major policy shift as the DEIS/EIR proposes, the result of which a substantial amount of SUAD (suitable for unconfined aquatic disposal) maintenance dredged material that is now disposed of in-Bay would be required to be placed upland. First of all, the NEPA/CEQA-mandated environmental and economic effects evaluations have not been completed. Also the actual costs and environmental effects of dredged material placed in upland environments must be evaluated in comparison to the other aquatic (restricted and unrestricted) alternatives, in-bay and ocean. We can support the reuse approach but only when it is shown to be cost-effective and is environmentally beneficial. The legal requirements of NEPA and CEQA are that alternatives must be practicable, and the practicability of upland reuse has not been adequately demonstrated yet.

2 We have already begun to experience increased dredging costs in the past few years for maintenance dredging under our normal in-bay disposal practices due to many factors, including costs for sediment testing and the reduction of dredging contractors operating in the Bay to 1-2 companies. The DEIS/EIR has overlooked an essential point, i.e. the majority of material disposed at the in-Bay sites is maintenance material, not large volume, new work projects. We do not anticipate any new work projects in the future, except for the Port of Oakland's 50' deepening project and some parts of the S. F. to Stockton ship channel, and these projects will likely be able to utilize reuse opportunities. So for the purposes of the DEIS/EIR, it is important to direct LTMS agency attention to the economic impact of moving maintenance material to upland reuse. The Port of Oakland completed an economic analysis of what the impact would be to its operations if such a scenario took place, and we refer you to its cost charts and financial analysis as part of its comment submittal.

3 A predictable and timely completion of the maintenance dredging cycle for all maritime operations is crucial to the stability of the maritime-based economy. Our grave concern is that the implementation of a disposal approach that would limit in-Bay disposal of maintenance dredging to even smaller volumes than presently allowed under the Corps of Engineers in-Bay Site Management Plan (PN 93-3) will have severe business

disruption and major economic consequences to Bay users. ↑ 3


The major flaw of the DEIS/EIR is the failure to understand and apparent lack of knowledge about the economics of dredging and infrastructure cost associated with upland reuse and also the importance, both legally and scientifically, of the detailed environmental assessment in disposal decisionmaking. 4

As part of the environmental analysis, sediment quality testing and its role in determining environmental effects of disposal must be considered. Sediment quality evaluations drive disposal decisionmaking. At present there is no consistent and justifiable decisionmaking framework for interpreting the dredged material test data which makes the link from the test results to a determination of demonstrated environmental effects in any placement media. We concur with the Bay Planning Coalition's summary of sediment quality testing issues arising from Public Notice 93-2 and refer you to the paper, "Sediment Quality Testing: Issues Related to the Testing Guidelines for Dredged Material Disposal at S. F. Bay Sites." We recommend that the LTMS agencies convene a series of workshops to redraft PN 93-2 and develop a Regional Decisionmaking Framework, and, the result with these two combined, should be a new Regional Testing Guidance Manual. 5

We have long supported the very important inter-agency LTMS because it provides a framework for a long term solution to the problem of lack of available disposal sites and agree with its goals to retain a full range of disposal options in-bay, ocean and upland, and a one-stop permit process.

We are eager to participate with the LTMS agencies to promote and increase the opportunities for the beneficial reuse of dredged material. In fact we are most enthusiastic about the recent approval of funds by the State Coastal Conservancy to be distributed to the Port of Oakland, the City of Novato for Hamilton Airfield Restoration studies, and other parties to complete a plan to bring one or more upland reuse sites on line. We intend to apply the expertise of the Bay Dredging Action Coalition in advising on the technical and financial aspects of the reuse plan.

In the meantime, we recommend that the required economic and environmental analyses of reuse be completed and compared to other alternative aquatic sites, both restricted and unrestricted, so that an assessment can be made based on practicable, cost-effective solutions before choosing a particular policy alternative. This task should be completed now and adopted into the LTMS Management Plan. The DEIS/EIR can then be finalized subsequently. 6

Sincerely yours,

James Herman
Chairman
Retired Chairman Emeritus ILWU

Responses to BDAC — Bay Dredging Action Coalition, letter dated July 19, 1996

1. Statement noted. Please the responses to Port of San Francisco comment 1 and Chevron comments 1 and 2a.
2. The LTMS agencies believe that reuse is practicable for some maintenance projects, and perhaps for an increasing number over time as new reuse sites become available. (For example, a project such as that proposed at the former Hamilton Army Air Force Base, if built, could provide a practicable reuse site for many North Bay projects for up to several years, depending on how costs are allocated.) At the same time, the LTMS agencies recognize that in-Bay disposal may remain the only practicable alternative for some projects. For this reason, we have developed a “small dredger” policy and are proposing to allow a (reduced) level of in-Bay disposal to continue indefinitely.
3. Statement noted. The LTMS agencies are including a transition period to move from present practices to Alternative 3 (see section 6.5) to prevent business disruption and minimize economic consequences.
4. The LTMS agencies have spent extensive time and resources studying the costs and infrastructure associated with UWR projects. Particular aspects of the preferred alternative that address this issue are the multi-year transition period to full implementation of Alternative 3 and a small dredger exclusion policy. The former should help reduce impacts to all dredgers by allowing adequate time to implement new funding sources and dredging practices. The latter will aid the small dredgers with the least ability to implement alternatives to existing in-Bay disposal practices.

The LTMS agencies agree on the legal and scientific importance of a detailed environmental assessment in decision-making for dredged material disposal. This is the reason for preparation of a policy EIS/programmatic EIR to guide regional policy for dredging and disposal policies, and why specific environmental assessments will be required for projects and actions tiered under this document.

The economic evaluation is adequate and appropriate for making relative comparisons among the alternatives, and for the programmatic decisions being made at this time.
5. Sediment quality testing is discussed in section 3.2.5. Although PN 93-2 is a significant improvement over the previous PN 87-1, it does not result in a comprehensive sediment characterization. PN 93-2 was intended to provide interim testing guidance only, to be used until the EPA/USACE national CWA sediment testing manual could be published. The EPA/USACE "Inland Testing Manual" (ITM) has now been finalized, and will be the overall guidance followed for all in-Bay dredged material evaluations. However, the LTMS agencies will quickly issue more specific initial regional guidance for implementing the ITM (test species, contaminants of concern, etc.), and later plan to publish an overall Regional Implementation Manual tiered under the LTMS Management Plan. Both the Regional Implementation Manual and the LTMS Management Plan will be developed with opportunity for public comments, and the LTMS agencies are planning workshops for this purpose. Please see the response to Foster City comment 5.
6. Please see the response below to BPC (7/19/96 letter) comment 1 in regard to the EIS/EIR being an appropriate and adequate analysis for the broad policy-level decisions being made. Please note that periodic review is built into the implementation of the preferred alternative and ensures that program assumptions can be revisited and changes made if necessary. Revisions to the Management Plan will be made, as needed, every 3 years. Every 6 years a major programmatic review of and revisions to the Management Plan will be undertaken. In addition, on a 6-year cycle, any necessary amendments to the San Francisco Bay and Basin Plans will be initiated. Also note that practicability is not determined by comparing the costs of two or more options generally, but rather, is based on the economic, logistic, and technologic ability of the project proponents to use the options. Please see the response to BDAC comment 4.