

**ISSUE PAPER ON REDUCING DREDGING NEEDS
OR ELIMINATING UNNECESSARY DREDGING**

Question. How can unnecessary dredging be minimized and what relevant policies and/or actions should be included in the LTMS Management Plan? For the August 11, 1999 workshop, the interested parties should come prepared to discuss and/or propose potential options and/or relevant policies and actions aimed at minimizing unnecessary dredging that could be included in the LTMS Management Plan.

Background. An analysis of historic dredging volumes and factors potentially affecting dredging volumes over the next 50 years was presented in the EIS/R for the LTMS. From this analysis, a 50-year planning estimate of up to 296 mcg was derived. One goal of the LTMS is to reduce unnecessary dredging in San Francisco Bay.

Issue. Historically, the cost and logistics involved in dredging were assumed to deter dredgers from conducting unneeded dredging. Given the limited capacity for disposal in-Bay and concerns over potential impacts to Bay resources, there has been heightened concern that regional efforts be taken to sustain those dredging projects that are truly needed and that dredging be the minimum needed to sustain the proposed use. Examples of unnecessary dredging might include siting new facilities in high sedimentation areas where the anticipated uses could be served at existing facilities or at areas of lower sedimentation, or dredging facilities wider and/or deeper than needed.

Existing and Proposed Actions. Several mechanisms described below have already been or will be used in the future to achieve this goal.

- **Corps Cost-Benefit Analysis.** Each Corps dredging project must undergo an analysis to determine whether project benefits exceed construction or maintenance costs. The cost-benefit analysis establishes the continued economic need for Corps projects. This existing mechanism will continue to be used in the future.

- **Over-Dredging Reduction.** Beginning in the late 1980's, the Corps stopped paying for dredging occurring below project depths, thereby discouraging and reducing over-dredging in the Bay. This existing mechanism will continue to be used in the future.

- **Realignment of Navigation Channels.** The Corps is presently realigning the Napa River Channel to take advantage of deeper, natural portions in order to minimize the volume of dredging needed. It is estimated that realignment of the channel will reduce dredging volumes by approximately 200,000 cubic yards. This existing mechanism will continue to be used in the future.

- **Project Prioritization.** The Corps prioritizes all of its navigation projects. Maintenance dredging needs for each project are categorized according to use and costs. Higher use and lower cost (relative to cargo tonnage) categories are assigned higher priorities. Available funds for maintenance dredging are committed to higher priority categories first. The effect of this program on actual maintenance dredging volumes has not yet been calculated. This existing mechanism will continue to be used in the future.

- **Existing Policies.** The San Francisco Bay Plan contains policies stating that only dredging that is necessary to serve a water-oriented use or other important public purpose can be authorized by the Commission. Further, the Bay Plan also states that when considering proposals

for new marinas the Commission considers unsuitable sites to be those that fill up rapidly with sediment, and that at such sites frequent dredging should be avoided. These existing mechanisms will continue to be used in the future.

- **Seaport Plan.** The Seaport Plan process involves reviewing past, present, and future port operations to determine the need for specific berths, channels and other navigation features at the major Bay Area ports. The Seaport Plan process has been used primarily to minimize the need to place new fill in the Bay for port uses while providing for adequate facilities to meet regional port needs. During the Seaport Plan review process, the ports may consider the feasibility of structural and other measures that could reduce dredging requirements. As previously stated in the LTMS EIS/R (page 5-3), in the future, the LTMS agencies will continue to work with the ports within the context of the Seaport Plan process to identify potential means to reduce dredging needs while meeting the navigational needs of the region.

- **Regulatory Requirements.** As a part of the Dredged Material Management Office (DMMO) application process, project proponents are required to provide information identifying whether proposed dredging projects are both necessary and the minimum volumes needed. Required information includes a discussion regarding the need and purpose of the proposed project and hydrographic surveys of existing and proposed dredging depths. Further, the individual LTMS agencies' authorizations require dredgers to provide post-dredging hydrographic surveys and post-dredging volume reports to ensure that only the approved volumes are dredged. Further, these agencies have enforcement procedures that can be imposed for violations of permit terms and conditions such as dredging volumes. These existing mechanisms will continue to be used in the future.

- **Dredged Material Management Plans and NEPA Review.** The Corps, in consultation with the other LTMS agencies, will confirm or revise the Dredged Material Management plans for existing federal maintenance dredging projects in San Francisco Bay, and perform NEPA reviews as needed including supplementing the Composite EIS for Maintenance Dredging. These reviews will include consideration of channel widths, depths, and configurations in terms of potential changes that could reduce the volume of dredging necessary to meet the navigational needs of each project.