

SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION

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The following summarizes comments from the scoping meeting of July 8, 1998, regarding preparation of the LTMS Management Plan and potential strategies for allocating in-Bay disposal capacity in the future under the proposed LTMS preferred alternative.

Strategies involving trading (Strategy 1, 2, and 3)

- Could limit dredging to projects deemed more “valuable” and might have effect of giving priority to certain projects over others and thus placing a “value” on them. Consequently, not all projects would be perceived as “valuable” when in fact they all may be.
- Tracking would be difficult.
- Any scheme involving trading could bring about dredgers trading “futures.”

Strategy 1 (Multi-year Allocation With Trading)

- More fair than strategies involving single year allotments since not all projects occur on an annual basis.
- Multi-year strategy allows for longer-term planning and thus reliability.
- If wait to dredge is too long, dredgers run risk of not being able to dredge if they wish to do so at a time when the regulatory cap would be exceeded.

Strategy 2 (Average Annual Allotments With Trading and No Banking)

Strategy 3 (Average Annual Allotments With Trading and With Banking)

- Banking allows some stability and security in planning.
- With banking there might not be incentive to trade.

Strategy 4 (First Come/First Serve)

- Some dredgers may apply but application doesn't secure a place in line to dredge as those dredgers submitting their applications last would be last in line to dredge.
- May be least fair strategy.
- Under this strategy, time should be allowed for those who have submitted permit applications and yet experienced project delay because of regulatory delays.

Strategy 5 (Reduced In-Bay Disposal of COE Maintenance Material To Achieve Volume Targets)

- Because out-of-Bay disposal of COE material would be budget-dependent it could result in reduced dredging and thus restricted access to certain areas.

Proposed Strategy 6 (Ed Ueber's)

- In-Bay disposal allotments should not be based on a historical “right” (i.e. as indicated in proposed Strategies 1, 2, and 3). Instead, the free market system should be used and allotments sold using an open-bid process.

Proposed Strategy 7 (Save the Bay)

- No banking or trading but includes incentives for decreasing in-Bay disposal. (No specific incentives were proposed.)

Combination of Strategy 1 and 3

- Multi-year period with banking and trading options.

Small dredger exemption

- Concern expressed that possibly gives unfair advantage to this group of dredgers and that perhaps they should participate in selected allocation strategy especially since some small dredgers may be better situated (geographically) to use UWR sites.

UWR Disposal

- All strategies involving consideration and use of UWR sites should consider these opportunities still limited and that transition period is necessary to allow for more UWR sites to come on-line.

Proposed In-Bay disposal fee

- Requires legislation.
- May be incentive to get UWR sites on-line and used.
- May be redundant with existing RMP fees.

Miscellaneous

- Relationship of Delta Protection Commission and CALFED to LTMS Management Plan is that former efforts focus on Delta issues. However, LTMS did consider reuse of material in Delta region and further CALFED funds are being used to support UWR efforts e.g. Hamilton restoration project.
- Management Plan should provide clear definition of "new work" projects. Further, note that any new work projects would alter future maintenance volumes in Bay and thus future in-Bay disposal allocations.
- Market mechanisms need to be examined more carefully and used as allocation tool as they may be most efficient way to manage.