SUPPLEMENTAL INFORMATION REPORT FOR THE USACE SAN FRANCISCO BAY PROGRAM 2025 DREDGING SEASON San Francisco Bay, California January 2025





U.S Army Corps of Engineers San Francisco District

¹ Image Credits for Clamshell Dredge: Pearson Scott Foresman, Essayons Dredge photo: unknown

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Acronyms

- BA Biological Assessment
- BO Biological Opinion
- CA California
- CEQ Council on Environmental Quality
- CFR Code of Federal Regulations
- CWA Clean Water Act
- EA Environmental Assessment
- EIR Environmental Impact Report
- EIS Environmental Impact Statement
- ESA Endangered Species Act
- LTMS Long Term Management Strategy for Dredging of the San Francisco Bay
- NEPA National Environmental Policy Act
- SEA Supplemental Environmental Assessment
- SEIS Supplemental Environmental Impact Statement
- SF San Francisco
- SIR Supplemental Information Report
- USACE US Army Corps of Engineers
- U.S.C. United States Code
- USFWS US Fish and Wildlife Service

1.0 Introduction

The United States Army Corps of Engineers (USACE) proposes to continue maintenance dredging of the federal navigation channels in San Francisco Bay to maintain the navigability of the channels for the 2025 dredging season which is expected to extend from March 2025 to June 2026. The specific dredging channels that are planned for the 2025 dredging season include:

Oakland Inner and Outer Harbor Channel, Richmond Inner Harbor Channel, Pinole Shoal Harbor Channel, Redwood City Harbor Channel, Suisun Bay and NY Slough Channel, Petaluma River Channel, SF Main Ship Channel.

Emergency dredging operations in other channels not scheduled for the 2025 dredging season may be necessary if navigability of the channel is impaired to the extent that it causes unsafe conditions and risk to property and human lives, and such an action would be covered by this National Environmental Policy Act (NEPA) Supplemental Information Report (SIR) with amendment as needed if emergency dredging would cause effects to the human environment which are not considered in this SIR.

The dredging process involves the excavation of accumulated sediment from the channel bed, and the subsequent transportation and placement of the sediment at a permitted facility or location in a manner consistent with the permit conditions established by applicable regulatory agencies, after determination of suitability for placement at that site. The environmental impacts of maintenance dredging of the federal navigation channels were initially described in USACE's Federal Navigation Channels Environmental Assessment/Environmental Impact Report (EA/EIR), a joint NEPA and California Environmental Quality Act compliance document written together with the San Francisco Bay Regional Water Quality Control Board covering USACE dredging activities from 2015 – 2024.² The environmental effects of dredged material placement activities associated with dredging the federal navigation channels in San Francisco Bay were analyzed in the Long-Term Management Strategy for Placement of Dredged Material in the San Francisco Bay Region, Final Policy Environmental Impact Statement/Programmatic Environmental Impact Report in 1998. To further analyze effects from placement of dredged material with a programmatic scope the USACE has prepared a draft document which is currently undergoing public review under the title, San Francisco Bay Regional Dredged Material Management Plan 2025 – 2044 (USACE 2024A). Subsequent to publication of these documents and extensions to other SF Bay dredging programmatic permits such as the Clean Water Act Section 401 Water Quality Certification and the Coastal Zone Management Act Consistency Determination, and any other necessary permits, USACE will reconsider any new effects identified that are not herby covered in this SIR.

² Federal Navigation Channels Environmental Assessment/Environmental Impact Report available online at: <u>https://www.waterboards.ca.gov/rwqcb2/water_issues/programs/dredging/Fed%20Nav%20Channels_FEAEIR_April%20201</u> <u>5.pdf</u>



Figure 1. SF Bay Federal Navigation Channels and Placement Sites³

³ Figure adopted from the EA/EIR (Figure 1-3).

Therefore, this SIR is written to fulfill USACE's NEPA compliance requirements for maintenance dredging of federal navigation channels it maintains in San Francisco Bay for the 2025 dredging season. This SIR is prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, and 42 U.S.C. § 4321 et seq.; the Council on Environmental Quality (CEQ) regulations for implementing NEPA, 40 C.F.R., pt. 1500-1508; USACE Procedures for Implementing NEPA (Engineer Regulation 200-2-2); USACE regulations for operation and maintenance of civil works projects (33 C.F.R. pt. 335-338); Section 404 of the CWA (33 U.S.C. § 1344 and 33 C.F.R. pt. 320-330). The USACE is the NEPA lead agency under this action.

2.0 Supplemental Information Report

This SIR is being produced to ensure, through a revised impact analysis, that the individual and cumulative effects from the proposed action are in compliance with NEPA. The Council on Environmental Quality (CEQ) regulations provide direction regarding the review and preparation of supplemental documents in CFR 1501.5 (h) which states: "Agencies: (1) Should supplement environmental assessments if a major Federal action is incomplete or ongoing, and: (i.) The agency makes substantial changes in the proposed action that are relevant to environmental concerns"

None of the supplemental information presented in this report reveals significant environmental impacts. There are no substantive changes to the proposed action included herein compared to what was already included in the EA/EIR, therefore analysis of environmental impacts are for those resulting from any effects anticipated for extending dredging operations from the EA/EIR for one more operational year to cover the 2025 dredging season using new information on the state of the human environment in 2024 per the timing to complete this SIR.

As described below in this SIR, USACE has determined that the changes to the proposed action are not substantial relative to the originally proposed action or associated environmental concerns and do not constitute significant new circumstances or information bearing upon the proposed action or its impacts. Therefore, USACE has concluded that a Supplemental EA (SEA) is not necessary, and this SIR is sufficient.

Section 3.0 of this SIR describes the updates to the proposed action in greater detail and Section 4.0 presents the revised impact analysis. Section 5.0 provides USACE's conclusions.

3.0 Changes to the Proposed Action (Recommended Plan)

There are no changes in the project description as presented in the EA/EIR for any dredging methodology, placement site, or other effects related with the actions covered under the EA/EIR (see Figure 1 below) except for the timing to extend the actions included in the EA/EIR by one operational year during the 2025 dredging season.

4.0 Revised Impact Analysis

The EA/EIR describes in detail the environmental baseline for each resource type potentially affected by the proposed action, and the proposed action's effects on that resource. For this SIR, only resources with potentially changed impacts due to the changes to the proposed action or regulatory environment are described herein are evaluated below.

Resource categories with no anticipated potential changes to the effects already described in the 2015 - 2024 EA/EIR include:⁴

Geology, Soils, and Sediment Quality; Hydrology and Water Quality; Air Quality and Global Climate Change; Biological Resources; Cultural and Paleontological Resources; Land Use; Hazards and Hazardous Materials; Transportation;

The Endangered Species Act (ESA) Federal Listing of the Longfin Smelt (*Spirinchus thaleichthys*) fish species reflects the only functional changes in Aquatic Biological Resources which is further analyzed below.

4.1 Aquatic Biological Resources

For the effects analysis of the USACE SF Bay Dredging Program on biological resources, the substantive change in biological resources since the Programmatic BA was finalized include the ESA federal listing of the Longfin Smelt species and will therefore form the basis for this effects analysis. The metric for this effects analysis is as follows: effects from the action would result in a finding of significant impacts if the action would jeopardize the Longfin Smelt population or cause degradation to its habitat in a manner which would cause extinction of the species.

The effect of dredging operations including placement of fill material at the various placement site locations was considered in the EA/EIR with special consideration for the Longfin Smelt species which at the time of publication had not yet been federally listed as an ESA protected species. Based on scientific studies (ERDC 2024), entrainment from hydraulic dredging was determined to cause negligible impacts to smelt populations and effects from mechanical dredging were also found to be negligible to smelt populations.

USACE as a member of the Long Term Management Strategy (LTMS), which is a voluntary coalition of government agencies that oversees dredging in the San Francisco Bay, has cooperatively produced an ESA Section 7 Biological Assessment (BA) to address how USACE and other non-federal dredging operations would impact the Longfin Smelt species (LTMS 2024). The LTMS BA provides coverage for almost all of the dredging projects USACE carries out in the SF Bay, however, as the Oakland Inner and Outer Harbor Federal Navigation Channel has a separate US Fish and Wildlife Service (USFWS) Biological Opinion, a unique not likely to adversely affect determination was made for the Oakland channel to provide ESA compliance for the 2025 - 2029 dredging seasons (USACE 2024B). In both the LTMS and Oakland BA a not likely to adversely affect determination was made based on recent scientific evidence which shows how the life stages of the longfin smelt do not coincide in space or time in a manner that would cause jeopardy to the species (Tobias 2023).

Regarding effects to SF Bay Longfin Smelt habitat, the small footprint of federal navigation projects as well as their locations within SF Bay are not expected to cause degradation to the

⁴ The 2025 – 2044 Draft San Francisco Bay Regional Dredge Material Management Plan was reviewed to ensure no new effects are anticipated for resource areas that were considered but not included in the effects analysis for this SIR.

overall SF Bay habitat such that the species would be jeopardized as a result of the action (LTMS 2024, USACE 2024B).

The conclusion contained in the EA/EIR reflects the same determinations from the LTMS and Oakland channel BAs - hydraulic dredging would not entrain Longfin Smelt at the detriment of the species, nor would a mechanical dredging method nor any dredge material transport and placement methods jeopardize the species, and this conclusion remains unchanged as a result of the changes to the proposed action described in this SIR for the 2025 dredging season.

4.1.1 Determination

Based on this analysis, the proposed action to perform dredging of the USACE SF Bay Federal Navigation Channels for the 2025 dredging season would be substantially similar in nature, location, and seasonal duration of the activities described in the EA/EIR, and therefore, would not result in any substantially changed effects to aquatic biological resources beyond those already evaluated in the EA/EIR. The determinations of the level of significance of these effects made in the EA/EIR would remain unchanged with the proposed action of extending the action in the EA/EIR for the 2025 dredging season.

5.0 Conclusions

The revised impact analysis conducted in this SIR supports the USACE determination that the change to the proposed action to add an additional operational year for the 2025 dredging season is not substantial relative to the originally proposed action and does not constitute significant new circumstances bearing upon the proposed action or its impacts. The results of the revised impact analyses from section 4 have shown that the change to the proposed action described in this SIR would not result in substantially changed effects which are not significant either individually or cumulatively, which are not already identified in the 2015 - 2024 EA/EIR. These findings support the determination that an SIR is appropriate to document this project change instead of an SEA or SEIS.

Should future, currently unforeseen changes to the proposed action be necessary, those changes would require additional evaluation to determine if a subsequent SIR, SEA, or SEIS would be necessary. Any such evaluation would also consider the information contained in this report to ensure that any future impacts analyses are performed while considering the entirety of information as it pertains to this project.

6.0 References

- ERDC (United States Army Engineer Research and Development Center), Draft Entrainment of Smelt in San Francisco Bay by Hydraulic Dredges. Personal Interview on November 18, 2024.
- Tobias, Vanessa D., Baxter, Randall 2023. Fewer and farther between: changes in the timing of Longfin Smelt (Spirinchus thaleichthys) movements in the San Francisco Estuary. Preprint Version 2, March 21, 2023. https://www.preprints.org/manuscript/202101.0512/v2
- USACE and SFBRWQCB 2014. Federal Navigation Channels Environmental Assessment/Environmental Impact Report. Available online at:

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- USACE 2024A. Draft San Francisco Bay Regional Dredged Material Management Plan 2025 2044. Available online at: https://www.spn.usace.army.mil/Portals/68/docs/P%20and%20Programs/RDMMP/SFBa y_RDMMP_FinalDraft.pdf?ver=BoLw0o2QlPZsPnghVtj90A%3d%3d
- USACE 2024B. Oakland Inner and Outer Harbor Biological Assessment Addendum for the Not Likely To Adversely Affect Determination for the Longfin Smelt Species.
- LTMS 2024. Long Term Management Strategy Biological Assessment. Submitted to USFWS on October 1, 2024. Available by request.

7.0 Appendix A: Public Comments and Agency Responses

No public comments were received, therefore this report was finalized without changes between the draft and final version.