

SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION  
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December 1, 1989

TO: All Commissioners and Alternates  
FROM: Alan R. Pendleton, Executive Director  
SUBJECT: STAFF REPORT AND RECOMMENDATION FOR LEGISLATION TO  
PREPARE A STATE DREDGING PLAN FOR THE SAN FRANCISCO BAY  
(For Commission consideration on December 7, 1989)

Recommendation

The Executive Director recommends that the Commission direct the staff: (1) to prepare proposed legislation requiring the preparation of a Bay dredging plan; and (2) to negotiate a memorandum of understanding with the U.S. Corps of Engineers and the U.S. Environmental Protection Agency regarding dredging.

Summary

For several years now, Bay dredging has been in a state of continuing crisis which continues unabated. Concerns include the lack of disposal capacity and predictability for Bay dredging projects, the impacts of in-Bay disposal on Bay fisheries, the recirculation of disposed material, and the pollutant impacts from in-Bay disposal.

The San Francisco District of the Corps of Engineers proposed federal dredging program for the Bay is controversial and, pending policy review by the Corps of Engineers at the national level, has not progressed significantly. The new national policy significantly narrows the focus and funding of the District's program. It also calls for state and local involvement and contributions of funding.

Thus, it appears that the State of California cannot rely solely on federal efforts to resolve dredging concerns. Individual responses of the several involved state agencies would lead to duplication and potentially inconsistent policies. A coordinated state response to resolve the problem is needed. The state program should also be fully coordinated with federal planning efforts. To achieve this, a Bay dredging management plan should be prepared by the Commission and the San Francisco Bay Regional Water Quality Control Board, working closely with other state and federal agencies. The management plan should address dredging needs, provide adequate and predictable disposal capacity, address pollutant and fishery issues, and streamline the regulatory process as appropriate. Because many elements of the plan are already mandated and funded, the plan should pull together existing programs as well as provide new resources to produce a comprehensive

plan for Bay dredging and disposal. An advisory committee that includes ports, shipping companies, marinas, fishing interests, environmentalists and other affected parties should aid in the preparation of the plan. A memorandum of understanding between the appropriate state and federal agencies may be the best vehicle to coordinate a state/federal dredging plan and program. The Bay dredging plan proposed by staff is discussed in detail later in this report.

### Problem Statement

In recent years, dredging and disposal in the Bay have become highly controversial, due mainly to: (1) insufficient disposal capacity for material proposed to be dredged from the Bay; (2) concerns over impacts of disposal on Bay fisheries and resources; (3) concerns over the role of dredging and disposal in Bay pollution, particularly the adequacy of water quality tests; (4) lack of adequate information to evaluate dredging projects and to determine whether disposal in the Bay, in the ocean, to upland areas, or some combination best protects resource values; (5) concerns about adverse impacts to the regional economy due to the lack of predictability; and (6) lack of a sufficiently coordinated response that includes all interested parties and is likely to reach consensus to resolve dredging problems.

1. The Capacity Problem. At this time, the Alcatraz disposal site remains the only site available for most Bay maintenance dredging and the increased volume of proposed new dredging projects (approximately 19 million cubic yards). The Alcatraz disposal site was chosen in large part because it was thought that all of the deposited material would disperse, mostly to the ocean. However, most disposed material has not dispersed out of the Bay, and material has accumulated at the Alcatraz site to the point that capacity for further ongoing disposal is questionable. Disposed material may also simply recirculate to locations where further dredging is then needed. Because the capacity at the Alcatraz site is uncertain, future disposal of large amounts of material, especially the more cohesive material from new projects, could exceed the site's capacity.

2. Physical Impacts. It is increasingly clear that most disposed dredged material remains in the Bay, and the increasing volume of disposal raises concerns that dredged material disposal may be causing adverse physical impacts to aquatic organisms in both the water column and on the Bay bottom. Further, possible changes to the contours of the Bay bottom from deposition of disposed material may increase maintenance dredging needs and affect Bay currents, with possible adverse impacts to Bay resources. For example, Bay fishing interests allege that material disposed at Alcatraz is covering productive fishing areas in the Central Bay, resulting in the elimination of habitat for rockfish as well as other valuable fish.

Material resuspended in the water column by dredging and disposal increases water turbidity. If sustained high levels of suspended sediments from dredged disposal are present in the Bay, physical harm to organisms may result, while lower levels may cause mortality to sensitive life stages of Bay

fish or impair their ability to find prey and/or reproduce. Additionally, high turbidity may reduce light penetration and lower the productivity of or eliminate aquatic Bay plant species, such as eel grass. Whether these effects are a problem in the Bay is strongly debated. Bay fishing interests allege that increased turbidity has contributed to the decline of the already diminished Bay sport and commercial fisheries, not only by the mechanisms noted above, but also by causing schooling fish to disperse, migratory fish to avoid or pass rapidly through the Bay, the elimination of baitfish, and by causing fish to simply "go off the bite." The Department of Fish and Game has collected data that they believe supports these allegations.

3. Pollutants. Dredging and disposal can redistribute polluted sediments. In the urbanized and industrialized Bay system, toxic pollution of Bay sediments is a serious problem, impacting both bottom dwelling organisms and Bay organisms coming into contact with suspended sediments. Dredging and disposal can redistribute polluted sediments to increase their pernicious effects on Bay organisms. Most dredging occurs in areas at greatest risk for sediment contamination.

The state and federal pollutant testing programs intended to prevent in-Bay disposal of contaminated material, although improved in the past several years, are still evolving and controversial. Numerical criteria to judge acceptable pollutant levels in sediments are presently lacking, and permit decisions must be based to a great extent on professional judgment. Unfortunately, some Bay sediments contain toxic "hot spots" and contaminated material has been detected at the Alcatraz disposal site. This is of particular concern because most of the material disposed at the in-Bay sites recirculates and is redeposited throughout the Bay.

4. Lack of Information. Properly managing Bay dredging and disposal depends on the availability of adequate information on the impacts of dredging and disposal on Bay fisheries and the aquatic ecosystem. However, adequate information is not available, due, in part, to incomplete knowledge about Bay sediment processes, including Bay turbidity and the movement of Bay sediments, and the impacts of pollutants in dredged material. Further, information is needed on the practicality and environmental impacts of alternative disposal sites.

5. Adverse Impact on the Regional Economy. Shipping, fishing and recreation all contribute significantly to the regional economy. The uncertainties and delays faced by sponsors of Bay dredging projects, resulting from the capacity and environmental concerns discussed above, are adversely affecting the regional economy and threaten to damage the region's competitiveness with areas where dredging policy is clearer. For example, the increased size of container ships require deeper channels than are found in Oakland presently. Unless the Port of Oakland can provide predictable times within which depths may be increased, shippers may shift cargo to other ports where channel depths are less of a problem. Shippers may also be reluctant to invest in terminal improvements without assurance of sufficient water depths

to meet planned increases in ship size. The United States Navy also contributes significantly to the regional economy and it is hampered from fulfilling its mission, risks damage to its deeper draft ships, and is likely to be reassessing which locations are most appropriate to homeport ships which may otherwise have been assigned to San Francisco Bay. Sports and commercial fishing interests assert that catches continue to decline and that some of this decline can be ascribed to a dredging policy that does not fully address the environmental needs of fish.

6. Lack of a Coordinated Response. Several state and federal agencies are responsible for different aspects of Bay dredging so it is not surprising that, to date, response to dredging concerns has been fragmented. The San Francisco District of the Corps of Engineers, the agency that traditionally took the lead in managing Bay dredging issues, is attempting to implement a new management plan for its Bay dredging program. The proposed program would consider a range of disposal options and likely would include some research on the impacts of in-Bay disposal; the District estimated the cost of the program at approximately \$9.5 million. However, the proposed plan has met strong opposition within the region from fishing and environmental interests who believe that it does not adequately respond to their concerns.

At the national level, the Corps has withheld funding for the program pending policy review, which has delayed key studies. Policy guidance to the Corps District was made public at the November 9, 1989 meeting of the Corp's Dredged Material Management Program Coordinating Committee. The guidance letter, signed by Brigadier General Kelley, Director of Civil Works for the Corps, cut the total funding for the Corps program from \$9.5 to \$5 million. Additionally, he stated that the program should be broadened to include other affected parties and should be cost-shared on the following basis: Corps \$2.5 million; Navy \$1 million; EPA \$500,000, and non-federal organizations (i.e., state and/or dredging sponsors) \$1 million. The guidance letter also appeared to rule out Corps funding for study of ocean disposal sites in deep water beyond the continental shelf. The local Corps District is presently considering how to implement the direction it has received.

In November, 1989 the Congressional General Accounting Office (GAO) released a study critical of the federal management of dredging and disposal in San Francisco Bay. The GAO criticized both the lack of progress made by the Corps and the Environmental Protection Agency to designate an environmentally acceptable ocean disposal site and the failure to adequately assure that environmental damage from in-Bay disposal is within acceptable levels.

7. Opportunities. Opportunities exist to use dredged material as a resource, if such use is found to be practicable and environmentally acceptable. These include the use of dredged material to create tidal wetlands in areas presently diked from the Bay. Some Bay material is suitable for use in beach nourishment projects. Some dredged material can also be used for levee maintenance. Levees in the Delta are seriously dilapidated and material dredged from the Bay could be used to protect Delta islands and the state water system.

## Background

At its December 1, 1988 meeting, after considering the staff's "Status Of Bay Dredging" report, the Commission: (1) initiated the process of revising the Bay Plan findings and policies on dredging; (2) sent letters to the Bay Area congressional delegation, local ports, the Navy, the U. S. Environmental Protection Agency, and the Corps regarding dredging; (3) directed the staff to further coordinate with other Bay dredging regulatory agencies, such as the Regional Water Quality Control Board; (4) resolved to promote research on Bay sediment dynamics; (5) limited all new dredging permits to a year in length until dredging issues are resolved; and (6) resolved to require as a condition of new dredging permits that the permittee provide post-dredging information on actual areas and volumes dredged.

At its April 6, 1989 meeting, the Commission decided to reconsider the measures it took in regard to dredging and consider whether it should take additional or different measures. The Commission held public hearings on these issues on June 15 and July 1, 1989 and received testimony from representatives of the Bay ports, other public agencies, and the public. Representatives of the dredging community reaffirmed the importance of continued dredging to Bay maritime activities and the regional economy, and expressed their misapprehension that the Commission's advisory letters constitute a general prohibition on dredging and disposal in the Bay. Representatives of environmental and fishery groups expressed their concerns over the alleged impacts of continuing in-Bay disposal on Bay fisheries and resources. On August 17, 1989 the Commission received a staff update on dredging matters and considered possible responses, including preparation of a Bay dredging plan.

## Bay Dredging Plan

Increasingly, the public is turning to State agencies, such as the San Francisco Regional Water Quality Control Board and the Commission, to formulate a comprehensive policy for Bay dredging. The Commission has already initiated consideration of amendments to its Bay Plan policies on dredging, and has directed staff to consider what further measures may be needed. The Regional Board has recently adopted new policies on dredging related to water quality and has received funding for several new initiatives involving Bay dredging. However, the magnitude and breadth of the problem require a response beyond the present resources of the two agencies, while the pressing nature of the problem requires an expedited response. Therefore, building on the measures already being taken by the Commission and the San Francisco Regional Water Quality Control Board, the State of California through these agencies should take a broader role to resolve current dredging controversies through the preparation of a Bay dredging management plan that fully coordinates state efforts, complements federal efforts, and aims toward consensus among all affected parties.

The plan should assess dredging needs and provide an array of acceptable disposal options for necessary dredging projects, and should also evaluate the environmental, economic, and social impacts of dredging and disposal options.

This approach recognizes the limits of federal funding and the importance of this issue to state interests. Further, such an approach is also consonant with Corps policy as contained in General Kelley's guidance letter, which calls for an active leadership role in Bay dredging planning for "non-Federal organizations" (i.e., the state and local dredging sponsors).

The Bay dredging plan should be formulated through a joint effort of the BCDC and the Regional Board and should directly involve the State Lands Commission, the Coastal Commission, Department of Water Resources, the Central Valley Regional Water Quality Control Board, and the Department of Fish and Game. The plan should be closely coordinated with the pertinent federal agencies to address their laws, policies, and initiatives (such as the Corps' Dredged Material Disposal Management Program). Preparation of this plan should be mandated by state legislation that directs participation by the above-mentioned agencies and provides funding to prepare the plan. As many components of the proposed plan are already mandated and funded, the program should fold in current efforts with the few necessary additions.

#### I. PROGRAM OVERVIEW

A. Objective. The plan should be a comprehensive policy document. It should assess dredging needs, establish policy for new and maintenance dredging, and ensure appropriate disposal of dredged material, emphasizing reuse of dredged material. The plan should also address all major contaminant problems, including locations of contaminated sediments, interim pollutant testing protocols, and the development of sediment standards for disposal to upland, wetland, estuarine, and ocean sites. It should include ways to implement the plan's recommendations. The adopted plan should be suitable for inclusion in BCDC's Bay Plan and the Regional Water Quality Control Board's Basin Plans. The legislation should be closely coordinated with and encourage the participation of federal agencies, particularly the Corps of Engineers, Environmental Protection Agency, Fish and Wildlife Service, and the National Marine Fishery Service; especially by focussing their efforts in areas where there is broad federal but little state jurisdiction and by contributing federal funds and expertise to the effort. The legislation should provide for interim control over dredging and disposal and should explicitly state both the need to dredge for water-oriented uses and the need to ensure that Bay resources and beneficial uses are protected from adverse impacts.

B. Planning Process. The planning effort should be modelled on the successful, open and participatory process the Commission and Regional Board follow in preparing and amending the Bay Plan and the Basin Plan. The state legislation should define the role of each of the two agencies in developing the dredging plan, with the participation of affected state agencies, for submission to the Legislature. Each agency should gather information, prepare reports concerning the plan elements assigned to it under the legislation, hold joint hearings on the reports, and formulate a draft plan. The planning process should involve extensive public and agency review, comment, and testimony and an advisory committee should provide technical input and review

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of the studies performed as part of the planning. After adoption by the two agencies, the plan should be submitted to the Legislature with implementation recommendations. Additional legislation may be necessary to carry out the plan.

## II. ELEMENTS OF LEGISLATION

Legislation is needed to direct the agencies to prepare the plan, mandate agency participation, and provide funding. The legislation should address: dredging, disposal sites, management of sites, necessary studies, federal coordination, coordinating and advisory groups, and funding. Each of these issues is outlined in the following sections, by first stating the objective and then identifying the elements of the legislation that achieve the objective, and the responsible lead agency(ies) for each element of the plan which are shown in parentheses.

### A. Dredging

1. Objective. The plan should assess Bay dredging needs and develop applicable policies. A regional dredging needs assessment should be produced, similar to the Seaport Plan, that recognizes technical and economic factors (such as rail connections and existing investments) affecting maritime and recreational boating facilities, in addition to sediment dynamics. The goal of this approach is to minimize dredging requirements while recognizing the needs of existing ports and other water-oriented uses such as marinas and water-related industries. The policies should both recognize the need for dredging and require that the public benefits of dredging outweigh any detriment to the Bay.

Areas of known or suspected sediment contamination should be identified. A strategy to abate ongoing sources of sediment contamination should be developed.

### 2. Plan Responsibilities

- a. Assess Bay dredging needs, in conjunction with MTC for ports and Department of Boating & Waterways for marinas. This should include factors affecting projects for marinas, ports, water-related industry, flood control, sand dredging, etc. (BCDC and State Lands Commission).
- b. Assemble data base on areas of known or suspected sediment contamination, identify sources of new or ongoing sediment contamination, and prepare plan to prevent or abate these sources (San Francisco Bay Regional Water Quality Control Board).

Motion

1. Define roles of two agencies
2. Give authority to these agencies to enter into pact.

- c. Develop policies for dredging projects that address dredging needs and methods to reduce those needs (i.e., breakwaters), and sediment contamination (BCDC and San Francisco Bay Regional Water Quality Control Board in cooperation with State Lands Commission).

## B. Disposal Sites

1. Objective. Identify and, where feasible, designate an array of disposal sites able to absorb dredging identified by Part A of the plan. These should include, if feasible and environmentally acceptable, an ocean site(s), appropriate existing in-Bay sites, diked bayland enhancement sites (i.e wetland creation), delta sites, and possibly a drying, desalting and rehandling facility. The emphasis of the plan should be on the use of dredged material as a resource. Potential uses of dredged material include levee repair, wetland projects, inland construction purposes, and beach nourishment. Purchase, management, and disposition of upland disposal sites should be addressed. Because the State of California has no authority outside of state waters to designate ocean disposal sites, beyond review under the federal Coastal Zone Management Act, designation of such sites is feasible only if the Corps of Engineers and the Environmental Protection Agency participate. Disposal of contaminated sediments should also be addressed.

### 2. Plan Responsibilities

- a. With the cooperation of the Department of Fish and Game, State Lands Commission, California Coastal Commission, Department of Water Resources, and the Central Valley Regional Water Quality Control Board, as appropriate, develop a disposal management plan for the Estuary with involved federal agencies, that should include:
  - (1) Ocean, in-Bay, diked bayland, upland, and Delta disposal sites where practical and environmentally acceptable. Determine where it may be necessary for appropriate state agencies to assist a local sponsor to establish and administer disposal sites. (BCDC/Regional Water Quality Control Board; in cooperation with the Corps of Engineers and the Environmental Protection Agency for ocean sites);
  - (2) Disposal priorities to guide where dredged material should be disposed with reuse as the preferred alternative (BCDC/Regional Water Quality Control Board in cooperation with State Lands Commission and the Department of Fish Game);



- (3) Assistance, and encouragement for expediting federal designation of ocean disposal sites (BCDC/ Regional Water Quality Control Board/California Coastal Commission); and
- (4) Identification of disposal or treatment facilities for material unsuitable for aquatic or uncontained upland disposal (Regional Water Quality Control Board/Department of Health Services).

C. Plan Implementation

1. Objective. Establish a framework for implementing the plan, using the dredging and disposal priorities and sites from sections A & B. The framework should include the institutional arrangements of the permitting process, the testing standards and protocols for the various disposal methods, disposal site management, and a system to coordinate disposal such as collection of material from various smaller projects for ocean or Delta disposal. A monitoring program for the various sites should also be included.

2. Plan Responsibilities

- a. Develop plan to implement Parts A and B that streamlines and coordinates state and federal dredging regulatory programs (BCDC/Regional Water Quality Control Board in cooperation with the State Lands Commission, the Coastal Commission, the Corps, and the Environmental Protection Agency);
- b. Develop water quality testing criteria and sediment criteria (Regional Water Quality Control Board in cooperation with BCDC and the Department of Fish and Game);
- c. Develop a program to monitor the effectiveness of the alternative disposal sites and management controls on dredging and disposal to minimize adverse environmental impacts (BCDC/Regional Water Quality Control Board in cooperation with the Department of Fish and Game).
- d. Develop possible mitigation measures, such as timing limitations and selection of dredging and disposal methods, to minimize adverse environmental impacts (BCDC/Regional Water Quality Control Board/Department of Fish and Game).

D. Necessary Studies

1. Objective. Several studies are needed to support development of the plan. These include sediment dynamics research, toxicity studies of dredged material, studies of the impact of material disposal at the different sites (site designation studies), engineering and economic feasibility studies for the various alternatives, and a study on the institutional arrangements needed to make the plan work.

2. Plan Responsibilities

a. Direct the agencies to carry out the following studies, in conjunction with studies currently being carried out or projected to be carried out by the Corps of Engineers and Environmental Protection Agency, that are needed to form the factual basis, of the plan:

- (1) The economic, social, and recreational impacts of dredging on the region and state (BCDC/State Lands Commission);
- (2) The environmental impacts of dredging and disposal on the Estuary (BCDC/Department of Fish and Game);
- (3) The physical aspects, such as Bay hydrodynamics and sediment transport, turbidity impacts on Bay resources, and other acute and chronic physical impacts to benthic organisms resulting from dredging and disposal operations (BCDC/Department of Fish and Game in cooperation with the Regional Water Quality Control Board);
- (4) Toxicity aspects, such as location of contaminated sediments, sources of sediment contamination, contaminant redistribution resulting from dredging and disposal, and impacts on biota caused by direct toxicity or pollutant bioaccumulation and biomagnification (Regional Water Quality Control Board in cooperation with the Department of Fish and Game);
- (5) present and future dredging needs, and methods to reduce the need for and volume of dredging (BCDC/State Lands Commission);

- (6) Technical, environmental, institutional, and economic analyses of disposal alternatives (BCDC/Regional Water Quality Control Board in cooperation with the State Lands Commission, Department of Fish and Game, California Coastal Commission, Department of Water Resources, and Central Valley Regional Board); and
- (7) Institutional analysis of the regulatory framework for plan implementation, focusing on simplicity and effectiveness (BCDC).

E. Federal Coordination

1. Objective. To ensure that state and federal programs regarding Bay dredging, to the extent possible, are consistent and complementary and provide a mechanism for direct federal participation in the program.

2. Plan Responsibilities

- a. Plan development should be coordinated with federal planning efforts, likely through a memorandum of understanding, to integrate the state and federal programs and prevent duplication of effort.
- b. Encourage the Corps of Engineers, the Environmental Protection Agency, Fish and Wildlife Service, and the National Marine Fishery Service to participate on the review committee. Requests for contribution of federal funding and technical support to the program should be included.
- c. BCDC, the California Coastal Commission, the Regional Board, and the Department of Fish and Game should be required to review and participate on the Corps' and EPA's ocean disposal studies and support, wherever feasible, appropriate federal funding for these efforts.
- d. The program should provide local sponsorship and policy guidance to aid development and implementation of the Corps dredging program.

F. Coordinating Committee

1. Objective. A committee of the participating state agencies is needed to coordinate production and review the studies.

2. Plan Responsibilities. A committee of the involved state and federal agencies (if federal agencies are able to participate), with staff support by BCDC and the Regional Board, should be formed to guide preparation of the studies and make recommendations to resolve conflicts, inconsistencies, and differences in the draft plan, with the following membership:

- a. San Francisco Bay Conservation and Development Commission;
- b. State Water Resources Control Board;
- c. San Francisco Bay Regional Water Quality Control Board;
- d. Central Valley Regional Water Quality Control Board;
- e. Department of Fish & Game;
- f. California Coastal Commission;
- g. Department of Water Resources;
- h. State Lands Commission;
- i. Department of Health Services;
- j. Corps Of Engineers;
- k. Environmental Protection Agency;
- l. U.S. Navy;
- m. National Marine Fisheries Service; and
- n. Fish and Wildlife Service.

G. Advisory Committee

1. Objective. An advisory committee is needed to provide technical input into the preparation and implementation of the management plan and related studies.

2. Plan Responsibilities. An advisory committee should be formed that would function similarly to the Commission's Scientific and Technical Advisory Committee and would include members of the aforementioned committee plus the following:

- a. Ports (Golden Gate Port Association);
- b. Dredging operators and users (Bay Planning Coalition);
- c. Recreational boaters (Pacific Inter-Club Yacht Association);
- d. Recreational angling and commercial fishing groups;
- e. Environmental groups;
- f. Water-Related Industries (petroleum industry);
- g. Flood control districts;
- h. U.S. Geological Survey; and
- i. Marina Operators (Harbormaster's Association).

H. Funding. The legislation should fund preparation of the plan and provide for personnel needs in the following manner (areas where funding has already been provided through separate legislation are noted in parenthesis):

1. State funding

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|----|---|---|
| a. | San Francisco Bay Conservation & Development Commission | Physical, resource, planning, disposal site, and economic studies and project management                        |
| b. | San Francisco Bay Regional Water Quality Control Board  | Contaminants, toxicity, disposal site, and resource studies, and project management (funding under Torres bill) |
| c. | Department of Fish and Game                             | Resource, impact, and disposal site studies   |
| d. | State Lands Commission                                  | Disposal site studies   |
| e. | California Coastal Commission                           | Ocean disposal & beach nourishment  |
| f. | Department of Health Services                           | Upland disposal of contaminated material  |

- g. Department of Water Resources      Delta levee disposal options (funding for levee maintenance already available)
- h. Central Valley Regional Water Quality Control Board      Delta water quality and environmental impacts

2. Federal Funding. Appropriate federal emphasis should be identified, as follows:

- a. Environmental Protection Agency      Ocean disposal option
- b. Corps of Engineers      Ocean disposal option, toxicity, alternative methods to reduce the need for dredging and/or disposal, and physical studies (significant funding for DMP program)
- c. Office of Ocean and Coastal Resource Management      Management plan development
- d. Environmental Protection Agency San Francisco Estuary Project      Studies (data gaps) and management plan development (action plan demonstration project)
- e. U.S. Navy      Ocean site and other studies
- f. U.S. Geological Survey      Sediment dynamics studies

3. Other Possible Funding Sources

- a. Ports;
- b. Local governments; and
- c. User fees.

I. Submittal of Plan. The recommended dredging and disposal management plan should be submitted to the Legislature with recommendations for any further legislation needed to implement the plan.