

CALIFORNIA COASTAL COMMISSION

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F 11a

CD-0001-20 (USEPA)

October 5, 2020

CORRESPONDENCE

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Sent: Monday, September 21, 2020 11:12 AM

To: Energy@Coastal <FORFC@coastal.ca.gov>

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Subject: Public Comment on October 2020 Agenda Item Friday 11a - CD-0001-20 (U.S. Environmental Protection Agency, Humboldt Co.)

TO: California Coastal Commission

FROM: Humboldt Bay Harbor, Recreation, and Conservation District

DATE: September 21, 2020

Subject: Public Comment on October 2020 Agenda Item Friday 11a - CD-0001-20 (U.S. Environmental Protection Agency, Humboldt Co.)

The Humboldt Bay Harbor, Recreation, and Conservation District (Harbor District) supports the approval of the Consistency Determination for the expansion of the Humboldt Open Ocean Disposal Site (HOODS) by one nautical mile to the north and west. HOODS is utilized by the US Army Corps of Engineers, Harbor District, City of Eureka, and other entities to dispose tested dredge material. HOODS is a critical asset for our region and it is essential that it continue to be available to receive dredge material.

The Harbor District helps maintain commerce and marine trade, but also holds “Public Trust” responsibility granted by the State of California over certain waters of Humboldt Bay and proactively works with our partners in protecting and restoring the Humboldt Bay ecosystem. The Harbor District and the City of Eureka each have separate dredging permits which allow the disposal of dredge material from our marina’s, docks, and boat repair facility’s at HOODS. We are working diligently to dramatically reduce the practice of taking hundreds of thousands of cubic yards of tested/clean fine-grain dredged sediment material from Humboldt Bay each decade several miles offshore to the HOODS for disposal. This source of tested/clean sediment is needed around the perimeter of the Humboldt Bay for adaptation to sea level rise, to restore salt marsh systems and ecosystem function, and for beach and dune replenishment. The Harbor District is committed to work with partner agencies to find pathways for beneficial reuse projects that would alleviate the accumulation of dredged material and also be protective of water quality and adapt to climate change. However, HOODS will continue to be needed as an option into the future.

Historically, some dredge material was beneficially reused around Humboldt Bay and the material was dewatered in the Harbor District's 21 acre Samoa Lagoons upland disposal site that has an active Coastal Development Permit that allows up to 65,000 cubic yards of dredge material to be placed onsite. The site was originally permitted and was used since the 1980s. However, in 2010 NCRWQCB halted the continued use of the site due to NCRWQCB staff concerns that some saline groundwater infiltration will occur during the saltwater dewatering back to Humboldt Bay. This occurred even though dredge spoils dewatering is specifically classified as a "Low Threat Discharge"; there are no drinking water wells on the Samoa Peninsula; there is a tidally influenced brackish layer overlying the freshwater; and dredging is required in order to maintain the Navigation (NAV) Beneficial Uses of Humboldt Bay. In addition, the Harbor District has been prevented from utilizing our suction dredge due to long fin smelt concerns. These action effectively prevented any beneficial reuse of dredge material in Humboldt Bay and all dredge material has been shipped three miles offshore to HOODS.

Over the last several years, the Harbor District has been working cooperatively with NCRWQCB, Coastal Commission, USACOE staff, and our Sediment Reuse Advisory Committee to come up with alternative strategies and in 2019 "small scale" dredge spoils dewatering was approved by all the permitting agencies at the Harbor District's Fields Landing and Redwood Marine Terminal II properties. The reuse project will begin in late September 2020 and will take dredge material from Woodley Island Marina, dewater the material at Redwood Marine Terminal II, and then reuse the material for sea level rise/tsunami fill material for a recently approved industrial park. Other beneficial reuse projects are planned once the Harbor District receives authorization to utilize our suction dredge. This was a huge step forward and we greatly appreciate all the agencies cooperation. However, in order to dewater the 100s of thousands of cubic yards of material that are available and needed to combat sea level rise; restore salt marsh systems and ecosystem function, and for beach and dune replenishment around Humboldt Bay we must approve large scale dewatering projects that do not impact drinking water supplies and already have tidally influenced brackish water overlaying freshwater without requiring acres of plastic lining to be installed every year we use the site.

The Harbor District is implementing a sustainable dredging and sediment management plan, where we remove modest amounts of sediment at regular intervals instead of dredging massive amounts of sediment every ten years. Our plan is to transport tested/clean sediment from the Woodley Island, Eureka Small Boat Basin and other docks and boat ramps around the bay to our centrally located regional sediment management facility on the Samoa Peninsula. We have permitted areas on the peninsula where we could store sediment, but currently we would have to install plastic liners that would cost hundreds of thousands of dollars and create a huge amount of plastic trash. Lining would also create major challenges with regards to rain water management. Also, the Town of Samoa has been ordered by the Coastal Commission to increase the elevation of some of the developable areas due to climate change and tsunami impact considerations that would give us a place to deposit 100s of thousands of cubic yards of sediment directly to the site if no liner were necessary.

Between sea level rise and crustal deformation, Humboldt Bay is extremely vulnerable to climate change and we need to be able to re-use sediment to rebuild and shore up levees around the bay shore. We also need fill to restore keystone salt marsh ecosystems. While eel grass is thriving in nearly the same foot-print as in 1870, salt marsh has decreased by 95%. Therefore, the Harbor District understands the need for using clean sediment to rebuild areas that have subsided, such as White's Slough in southern Humboldt Bay so that salt marsh can be re-established and to create new living shorelines adjacent to critical shoreline public infrastructure such as the Arcata Wastewater Treatment Plant and Highway 101. Our inability to store sediment on the Samoa Peninsula constrains sediment re-use, which in turn ties our hands in starting climate change response and ecosystem recovery projects.

Until the regulatory issues associated with suction dredging, dewatering, and beneficially reusing dredge material can be modified and approved, we must continue to utilize HOODS as a disposal site. We respectfully request that the Coastal Commission approve the Consistency Determination for the expansion of HOODS.

Respectfully submitted by:

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