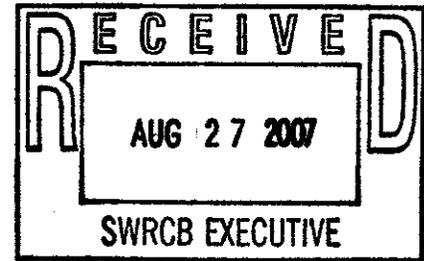


**From:** "Davenport, Clif" <Clif.Davenport@conservation.ca.gov>  
**To:** <commentletters@waterboards.ca.gov>  
**Date:** Mon, Aug 27, 2007 3:27 PM  
**Subject:** Comments on LTMS Amendment and Guidelines



Ms. Jeanine Townsend  
Acting Clerk to the SWRCB

Thank you for the opportunity to comment on the proposed amendment to the SF Bay Region's Basin Plan regarding the disposal of dredged sediment.

I am the Project Manager for the Coastal Sediment Management Workgroup's Sediment Master Plan. CSMW is attempting to facilitate regional approaches to protecting, enhancing and restoring California's coastal beaches and watersheds through federal, state and local cooperative efforts related to sediment management. Modeled loosely similar to LTMS and focused primarily on the open coast, CSMW membership includes the California Resource Agency and member Departments, the State Water Board, federal regulatory and resource agencies, and local agencies are represented through an umbrella organization. Some of the agency staff involved in DMMO are also involved in CSMW, and we are an integral part of the Ocean Protection Council and their efforts to improve ocean and coastal ecosystems and economy.

The Sediment Master Plan (see [www.dbw.ca.gov/csmw/csmwhome.htm](http://www.dbw.ca.gov/csmw/csmwhome.htm)) addresses concerns important to Regional Sediment Management (RSM) implementation such as identifying coastal erosion areas of concern, littoral cell approaches to beach nourishment and other coastal projects, identification and protection of coastal biota and/or habitat, preserving recreational resources and related economies, and public outreach, amongst others. We are currently implementing three pilot Coastal RSM Plans in selected portions of coastal California, with the intent to formulate consensus-driven RSM guidance and policy regarding beach restoration which has the following benefits: restore and maintain coastal beaches and other areas of critical sediment deficit; sustain recreation and tourism; enhance public safety and access; protect public infrastructure; and, restore coastal sandy habitats. While our efforts to date have focused almost exclusively on the open coast, we hope to partner with LTMS and DMMO, and have recently added staff from BCDC to our steering committee. We have identified at least two erosional areas of concern within the SF Bay, in need of beach nourishment/restoration, that would benefit from beneficial reuse of appropriate sediment. These locations include Robert Crown Memorial State Beach in Alameda, and Coyote Point in San Mateo County. A third location of concern (Ocean Beach) lies outside the Golden Gate.

As stated in the Basin Plan Amendment "Whereas 3", LTMS was initiated to maximize beneficial reuse of dredged material..." while "Whereas 6" indicates that dredged material can be used as a resource for wetland restoration, levee maintenance, landfill daily cover and construction fill. Beach nourishment should also be specifically listed as a beneficial reuse option for the reasons listed above. Such beneficial reuse is, of course, dependant on the quality of the dredged material. However, by listing beach nourishment as a potential beneficial reuse option, locations such as the erosional areas of concern to CSMW described above may become potential candidates for the sediment resource.

Thank you for consideration of my recommendation.

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