

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD,
SAN FRANCISCO BAY REGION

Errata Sheet for the Environmental Impact Report for San Francisco Bay Federal Channels Operation and Maintenance Dredging and Sediment Placement Activities, Dredging Years 2025-2034, State Clearinghouse No. 2024020498

The California Regional Water Quality Control Board, San Francisco Bay Region (Water Board), has prepared this errata sheet to correct a clerical error identified in the joint Environmental Assessment and California Environmental Quality Act (CEQA) Environmental Impact Report (EA/EIR) for San Francisco Bay Federal Channels Operation and Maintenance Dredging and Sediment Placement Activities, Dredging Years 2025-2034.

The errata sheet incorporates by reference the November 2017 entrainment monitoring data into Section 3.3.4.1 and Table 3-12 of the Draft EA/EIR released for public review on August 29, 2025. This errata sheet also explains how the revision is not significant because the information is not new, and the modification does not result in new or a substantial increase in the severity of significant environmental impacts. As a result, the modification does not warrant recirculation of the EA/EIR.¹

The EA/EIR mistakenly omitted the November 2017 entrainment monitoring. During November 2017 monitoring the most commonly entrained fish included Shokihaze Goby (n=170), Northern Anchovy (n=159), Yellowfin Goby (n=82), and Sand Sole (n=80). Three longfin smelt and no delta smelt were observed in monitoring. The observed number of fish entrained for all species, including longfin smelt, is consistent with the range observed during entrainment monitoring on other dates disclosed in the EA/EIR and does not change the analysis or anticipated impacts in the EA/EIR, as

¹ CEQA Guidelines Section 15088.5 requires that an EIR that has been made available for public review, but not yet certified, be recirculated only if significant new information has been added to the EIR. The relevant portions of CEQA Guidelines section 15088.5 read as follows:

- a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:
 - 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
 - 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043).
- b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

explained below. The pre-existing November 2017 entrainment monitoring is provided in the table of key species below and is added to Table 3-12 of the EA/EIR through this errata sheet.

Dredge Location	Monitor Year	Dredge Dates	Water Year Type	Species	Number Entrained
Pinole Shoal	2017	11/1–11/11	Below Normal	Northern anchovy	159
Pinole Shoal	2017	11/1–11/11	Below Normal	Sand sole	80
Pinole Shoal	2017	11/1–11/11	Below Normal	Pacific sanddab	12
Pinole Shoal	2017	11/1–11/11	Below Normal	Longfin smelt	3
Pinole Shoal	2017	11/1–11/11	Below Normal	California halibut	2
Pinole Shoal	2017	11/1–11/11	Below Normal	Brown rockfish	2
Pinole Shoal	2017	11/1–11/11	Below Normal	Western river lamprey	2
Pinole Shoal	2017	11/1–11/11	Below Normal	Diamond turbot	1
Pinole Shoal	2017	11/1–11/11	Below Normal	Speckled sanddab	1
Pinole Shoal	2017	11/1–11/11	Below Normal	Starry flounder	1
Pinole Shoal	2017	11/1–11/11	Below Normal	Unidentified sturgeon ¹	1

Source: Applied Marine Sciences 2018

¹ Unidentified sturgeon was part of a sturgeon carcass and not a living fish.

The November 2017 monitoring data does not affect the analysis or conclusions of the EA/EIR, particularly with respect to longfin smelt², a special status species. The EA/EIR uses a multiple lines of evidence approach to assess whether longfin smelt entrainment effects occur and are significant because no single line of evidence is determinative by itself. In this approach, the EA/EIR uses entrainment monitoring data to indicate and document that fish entrainment occurs during hopper dredging by the U.S. Army Corps of Engineers (USACE)-owned *Essayons* ship, but uses the percent of longfin smelt habitat affected and duration of dredging to assess the magnitude of this effect. This approach is described in more detail below.

Entrainment monitoring for hopper dredging demonstrates that entrainment of longfin smelt occurs, but by itself is insufficient to assess the magnitude of the impact. As described in section 2.3.1.5 of the EA/EIR, for many entrainment monitoring samples, often for entire hopper loads, the count of special status species collected by entrainment monitoring aboard the *Essayons* in San Francisco Bay is zero. This results in non-normal data distribution and, therefore, scaling the data using simple percentages gives questionable results. In addition, USACE's entrainment monitoring protocol is only able to inspect a subsample of the total volume of dredged sediment. Therefore, section 3.3.4 of the EA/EIR employs two lines of evidence to assess the significance of entrainment impacts to longfin smelt since it is infeasible to calculate an exact number of fish entrained.

The first line of evidence uses the percent of longfin smelt habitat within the relevant San Francisco Bay segment being impacted by hopper dredging to gain an understanding of the magnitude of potential entrainment impacts in each of the segments. The percent of longfin smelt habitat where hopper dredging would occur ranges from 1.4 percent in the South San Francisco Bay to 8.2 percent in San Pablo Bay. These percentages are higher than the total fraction of the longfin smelt habitat since the information in Table 3-15 intentionally does not include large areas of longfin smelt range in the Delta and shallow water habitats because they are outside the geographic scope of the EA/EIR. If that habitat was used, the percent of longfin smelt habitat impacted by dredging would be less than 1 percent.

For the second line of evidence, the EA/EIR uses the fraction of days in a year that longfin smelt habitat would be affected to gain an understanding of the duration of the potential entrainment impacts. Under all alternatives, longfin smelt habitat would only be affected for a few days of the year, ranging from 0.5 percent to 10 percent of the year depending on the specific alternative and dredging volume evaluated. Based on this, the EIR found that the exposure of longfin smelt to entrainment is expected to be relatively low, especially when factoring in a range of standard practices described in Section 2.3.1.5 of the EA/EIR. Nonetheless, impacts to longfin smelt are treated as significant because of their special status and their level of entrainment from hopper dredging. Accordingly, the proposed project incorporates into the project beneficial use of dredged material (in accordance with a formula) to reduce significant impacts to less than significant levels.

² The entrainment analysis focused on special-status fish species because while non-listed species would be entrained, the number of individuals entrained is not expected to have an impact on their population because their population sizes are not restricted like the listed species, and implementation of the Standard Practices in Section 2.3.1.5 and measures that protect special-status fish species would also protect and have less than significant environmental impacts on other species, including commercially important species. The November 2017 data does not affect the analysis for non-listed species and is consistent with other entrainment monitoring for these species. Further, it focused particularly on longfin smelt because entrainment data shows that green and white sturgeon, Chinook salmon, and delta smelt are rarely entrained at the monitored hopper dredging sites. Longfin smelt entrainment is highly variable on an annual basis, partly depending on Delta outflow which affects their abundance and distribution, and their small size make the species susceptible to entrainment.

Thus, the November 2017 monitoring data does not affect the EA/EIR's analysis of the significance of the longfin smelt entrainment impact or its conclusions. Rather, it reiterates other monitoring data in the EA/EIR that demonstrates longfin smelt entrainment from hopper dredging occurs. As such, none of the conditions in Section 15088.5 of the CEQA Guidelines are met, and recirculation is not required.