DEPARTMENT OF THE ARMY
SAN FRANCISCO DISTRICT, US ARMY CORPS OF ENGINEERS
450 GOLDEN GATE AVENUE, 4th Floor
SAN FRANCISCO CALIFORNIA 94102-3406

October 1, 2024

SUBJECT: Petaluma River Channel and Petaluma River Across the Flats
Suitability Determination 2025

Ms. Jessica Vargas
Chairwoman, Dredged Material Management Office
U.S. Army Corps of Engineers San Francisco District
450 Golden Gate Avenue, 4th Floor
San Francisco, CA 94102-3406

Dear Ms. Vargas:

The US Army Corps of Engineers (USACE) completed a sampling effort of the Petaluma River Channel and Petaluma River Across the Flats in 2024. The 2024 sampling effort was in support of an expected upcoming dredging event, which was contingent upon receiving funding to move forward. This project has now received funding to move forward with the dredging episode next year.

The different segments of the Petaluma River (River channel and Across the Flats) had last been dredged in 2020 and 2003, and therefore, significant shoaling is present, particularly in the upper reaches of the project. A review of the most recent survey conducted in July 2024, indicates that the shoaling currently present has not changed significantly since the sampling effort in June 2024. Since the material sampled has not been dredged and there is little change in shoaling, the USACE believes that the 2024 samples are still representative of the material present.

The results of the 2024 sampling effort were discussed on July 10th, 2024, Dredge Material Management Office (DMMO) meetings. The final report submitted on June 26th, 2024, included additional sample analyses for chlordane and mercury, which was elevated in the results of the initial efforts. There were also higher levels of the metals chromium and copper than anticipated. The final Sampling and Analysis Report (SAR) is enclosed for your convenience.

On August 6th, 2024, the DMMO determined that material was suitable either for Cullinan ranch restoration project, Montezuma Wetlands Restoration Project cover material, Montezuma Wetlands Restoration Project foundational material, and/or In-Bay placement depending on the sampling area (see attached MFR). The constraints of placement site this year have delayed the project for another year to plan alternative placement sites within the BUDDI document.

The earlier DMMO ruling focused on placement at Cullinan Ranch Restoration Project, considering the analysis of the sediment. However, the funding source of the BUDDI's intended placement is for Montezuma Wetlands Restoration Project for FY25.

It is very important in this new context to account for Montezuma, as this placement site change is affecting the incremental cost of the project.

A review of the California Office of Emergency Services Spill Release Reporting and Cal Spill Watch indicate no reportable spills have taken place in the dredging areas since the 2024 sampling effort. Since the 2024 sampling event, USACE knows of no spills or anthropogenic concerns that have been reported that could potentially impact the Petaluma River sediment quality.

The USACE requests concurrence that the findings made at the July 10th 2024, DMMO meetings are still valid for the material to be dredged from the Petaluma River Channel and Petaluma River Across the Flats in 2025. This concurrence would alleviate the need for any further suitability determination documentation for this current dredging event. USACE requests that this be added to your agenda for the October 16, 2024, DMMO meeting.

I am forwarding a copy of this letter to the other DMMO members: Ms. Brenda Goeden of the San Francisco Bay Conservation and Development Commission, Ms. Jennifer Siu of the U.S. Environmental Protection Agency, and Mz. Jazzy Graham-Davis of the San Francisco Bay Regional Water Quality Control Board. If you have any further questions or concerns, please contact Ms. Savannah Miller at (415) 589-0306 or via email at Savannah.K.Miller@usace.army.mil.

Sincerely,

Ellie L. Covington
Chief, Environmental Navigation and Operations Branch

Enclosures