

San Francisco Bay Conservation and Development Commission

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TO: Commissioners and Alternates

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SUBJECT: **Environmental Analysis CEQA Checklist (Appendix 4 to Bay Plan Amendment No. 1-26 Staff Report and Preliminary Staff Recommendation)**
(For Commission consideration on October 15, 2026)

Memorandum regarding Analysis of Environmental Impacts Pursuant to CEQA Checklist (14 CCR Div. 6 Ch. 3 App. G)

I. Introduction

The CEQA Checklist is a series of questions grouped by subject that identify different types of potential environmental impacts that a project may cause. CEQA analysis considers the existing conditions of a physical project site (baseline conditions) and then compares the baseline conditions against possible changes to the physical project site as a result of project implementation. Based on the CEQA Guidelines, the possible changes as a result of project implementation are rated on a scale of four impact levels: potentially significant impact (PSI); less than significant with mitigation incorporated (LTSMI); less than significant impact (LTSI); or no impact (NI).

The Commission's adoption of the proposed Bay Plan Amendment No. 1-26 ("BPA 1-26") would not cause a direct physical change in the environment because BPA 1-26 would not approve any specific development project but would result only in new and revised Bay Plan findings and policies. However, BPA 1-26 would indirectly lead to increased beneficial reuse of dredged sediment and increased use of excess upland soils to preserve, restore, and enhance bay and shoreline habitats and improve the shoreline's resilience to rising seas.

Future projects that fall under BCDC jurisdiction would need to be reviewed for consistency with all relevant BCDC laws, regulations, and policies, including the new and revised Bay Plan policies adopted as part of BPA 1-26. The potential environmental impacts of future projects that will need to be consistent with these new and revised Bay Plan policies may be considered indirect or secondary impacts of BPA 1-26. This environmental checklist evaluates and describes the different types of possible indirect environmental impacts that BPA 1-26 may cause based on the topics set forth in the CEQA Guidelines. (14 CCR Div. 6 Ch. 3 App. G.)



II. Montezuma Wetlands Restoration Project and Cullinan Ranch Restoration Project

At present, there are two primary locations in BCDC's jurisdiction which accept dredged sediment for beneficial reuse purposes: the Montezuma Wetlands Restoration Project (Montezuma Wetlands Project) in Solano County and the Cullinan Ranch Restoration Project (Cullinan Ranch Project) in Solano and Napa Counties. Both projects conducted environmental reviews pursuant to CEQA, and both have been permitted or otherwise approved by BCDC and other governmental agencies with jurisdiction.

A. Montezuma Wetlands Restoration Project

In summary, the environmental review conducted for the Montezuma Wetlands Project found that there may be potentially significant environmental impacts as a result of the project.¹ However, with implementation of certain mitigation measures, such potentially significant impacts could be eliminated or substantially lessened – except for air quality impacts from equipment operations during sediment placement activities. Although the potential air quality impacts were found to still be significant even after mitigation measures, the lead agencies for the Montezuma Wetlands Project determined that the benefits of the project outweigh and render acceptable any unavoidable adverse environmental effects to air quality. These benefits include restoring tidal marshes and implementing an alternative to in-water disposal of dredged sediment.

B. Cullinan Ranch Restoration Project

In summary, the environmental review conducted for the Cullinan Ranch Project found that there may be potentially significant environmental impacts as a result of the project.² However, with implementation of certain mitigation measures, such potentially significant environmental impacts could be eliminated or substantially lessened – except for impacts to preexisting freshwater wetland and upland habitats. Despite these anticipated potentially significant environmental impacts, it was determined that the cumulative effect of restoration activities would result in a net overall increase in habitat

¹ Solano County and the U.S. Army Corps of Engineers (USACE), lead agencies for the Montezuma Wetlands Project, adopted the *Montezuma Wetlands Restoration Project Final Environment Impact Report/Environmental Impact Statement* (EIR/EIS) on February 2, 1999, the Recirculated Draft Initial Study/Mitigated Negative Declaration on October 21, 2010 that addresses minor revisions to the Montezuma Wetlands Project, and the Addendum to the EIR/EIS dated March 20, 2018.

² The U.S. Fish and Wildlife Services (USFWS) and the California Department of Fish and Wildlife (formerly known as the California Department of Fish and Game) (CDFW), lead agencies for the Cullinan Ranch Project, adopted the *Final Environmental Impact Statement/Environmental Impact Report* (EIS/EIR) on April 22, 2010.

value. The restoration of the salt marsh in particular would provide critical habitat for the endangered Ridgeway's rail and salt marsh harvest mouse. Thus, the project would result in a cumulative benefit for biological resources.

Therefore, to the extent BPA 1-26 may result in additional dredged sediment being placed at either the Montezuma Wetlands Project or the Cullinan Ranch Project locations, any resulting environmental impacts have already been studied and appropriate mitigation measures implemented as conditions of project approval by BCDC and other government agencies with jurisdiction. BPA 1-26 will not directly result in the creation of new restoration sites that beneficially reuse sediment and soils. Still, any new habitat restoration projects that beneficially reuse sediment or soils will be subject to CEQA review and associated review and approval by BCDC and other government agencies with jurisdiction, which would result in the imposition of any necessary mitigation measures as conditions of project approval to avoid, reduce, or compensate for any identified potentially significant environmental impacts.

III. Environmental Review of BPA 1-26

A. Aesthetics

Impact Questions	Significance Determinations
Would the project have a substantial adverse effect on a scenic vista?	LTSI
Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	LTSI
Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LTSI
Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	NI

BPA 1-26 may result in an incremental increase in the placement of dredged sediment and soils in former and existing natural wetlands in comparison to current practice. This may cause limited temporary impacts as equipment, such as an offloader or trucks, are used to deliver the dredged sediment or excess upland soils to the restoration site. These visual impacts would likely be limited to the dredging/construction season and thus are likely to be periodic and temporary. Overall, BPA 1-26 is likely to lead to positive

visual impacts and improved shoreline appearance because BPA 1-26 is intended to replace former or degraded wetlands and salt ponds with restored, better functioning, vegetated wetlands.

Additionally, it is possible that BPA 1-26 could lead to increased stockpiling of dredged sediment or excess upland soils on or near the Bay shoreline. This may cause limited temporary impacts to scenic vistas prior to the distribution and use of the stockpiled dredged sediment and excess upland soils at a restoration site. While implementation of stockpiling could result in potential impacts to scenic vistas, such visual impacts would be identified, evaluated for, and any necessary mitigation measures developed, during environmental review and permitting of the stockpiling site.

At this time, BCDC does not have information about the location of future projects that may be proposed in local jurisdictions and that will need to be consistent with the new and revised Bay Plan policies and, therefore, cannot describe the specific potential visual impacts at particular locations.

B. Agriculture and Forestry Resources

Impact Questions	Significance Determinations
Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	NI
Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	NI
Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	NI
Would the project result in the loss of forest land or conversion of forest land to non-forest use?	NI
Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	NI

BPA 1-26 is not expected to cause an adverse impact on agriculture and forestry resources because BPA 1-26 focuses on increasing the beneficial reuse of dredged

sediment and excess upland soils for the purposes of preserving and restoring wetlands along the San Francisco Bay shoreline.

BPA 1-26 will not directly result in the creation of new restoration sites that beneficially reuse sediment and soils, and therefore, BCDC does not have any information regarding specific potential impacts to agriculture and forestry resources at particular locations which may occur as a result of BPA 1-26. All such future projects will need to be consistent with the new and revised Bay Plan policies and undergo environmental review and comply with mitigation requirements imposed by BCDC or other agencies with jurisdiction.

C. Air Quality

Impact Questions	Significance Determinations
Would the project conflict with or obstruct implementation of the applicable air quality plan?	LTSI
Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	LTSI
Would the project expose sensitive receptors to substantial pollutant concentrations?	NI
Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	NI

The number of dredging projects would not increase due to BPA 1-26. However, it is possible that ship and truck transportation could increase as a result of BPA 1-26, as sediment and soils are transported around the Bay shoreline to restoration sites that beneficially reuse sediment and soils. It is also possible that BPA 1-26 could result in stockpiling for excess upland soils, which may increase truck transportation and emissions in turn.

BPA 1-26 may result in the use of construction equipment at a greater frequency at restoration sites that beneficially reuse sediment and soils, which could increase emissions.

It is possible that there could be some impacts to air quality due to emissions from equipment operations, and from trucking if the sediment is double handled as a result of stockpiling. On the other hand, it is also possible that there would be less emissions if a construction site producing excess upland soils is closer to a restoration site in comparison to a landfill disposal site.

However, at this time, BCDC does not have information about the location of future projects that may be proposed in local jurisdictions and that will need to be consistent with the new and revised Bay Plan policies and, therefore, cannot describe the specific air quality impacts at particular locations.

D. Biological Resources

Impact Questions	Significance Determinations
Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	LTSI
Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	LTSI
Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	LTSI
Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	LTSI
Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	NI
Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	NI

BPA 1-26 may result in temporary disturbances to wildlife and aquatic life due to the placement of dredged sediment and soils for wetlands restoration. It is possible that there will be some temporary disturbance to wildlife and aquatic life during the processing of dredged sediment as well. All dredged sediment will be tested prior to use at a restoration site to ensure the sediment does not have elevated levels of contamination that would harm wildlife.

On the other hand, BPA 1-26 would increase the beneficial reuse of dredged sediment and the use of excess upland soils to preserve, restore, and enhance bay and shoreline habitats and is expected to result in faster vegetation establishment and in long-term

benefits to wildlife and habitat through the creation, preservation, and enhancement of wetland habitats.

At this time, BCDC does not have information about the location of future projects that may be proposed in local jurisdictions and that will need to be consistent with the new and revised Bay Plan policies and, therefore, cannot describe the specific potential impacts of processing and placing of dredged sediment and soils, or stockpiling, to biological resources at particular locations. All such future projects will need to undergo environmental review and comply with mitigation requirements imposed by BCDC or other agencies with jurisdiction.

E. Cultural Resources

Impact Questions	Significance Determinations
Would the project cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?	NI
Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	NI
Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	NI

BPA 1-26 would indirectly result in increased beneficial reuse of dredged sediment and the use of excess upland. During formal consultations with Bay Area Native American tribes, each tribe expressed general support for BPA 1-26 and its focus on wetland restoration indicated their belief that the types of projects that 26 would facilitate could result in positive, long-term protections to tribal archaeological resources.³

At this time, BCDC does not have information about the location of future projects that may be proposed in local jurisdictions and that will need to be consistent with the new and revised Bay Plan policies and, therefore, cannot describe the specific potential cultural impacts at particular locations.

³ More detailed discussion on the outreach efforts and formal tribal consultations conducted by Commission staff with certain Bay Area Native American tribes can be found in the “Tribal Cultural Resources” section below.

F. Energy

Impact Questions	Significance Determinations
Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	NI
Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	NI

Commission staff identified no evidence indicating there would be any environmental impact as a result of wasteful, inefficient, or unnecessary consumption of energy resources. Commission staff identified no evidence indicating BPA 1-26 would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

G. Geology and Soils

Impact Questions	Significance Determinations
Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	
Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	NI
Strong seismic ground shaking?	NI
Seismic-related ground failure, including liquefaction?	NI
Landslides?	NI
Would the project result in substantial soil erosion or the loss of topsoil?	NI
Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	LTSI
Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	NI
Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	NI
Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	NI

By encouraging restoration of bay habitats and adaptation of the Bay shoreline to sea level rise, BPA 1-26 would be expected to reduce soil and shoreline erosion. However, it is likely that dredged sediment and soils for beneficial reuse would be placed in former tidal wetlands that have experienced subsidence when such wetlands were diked off from the Bay. BPA 1-26 may indirectly result in temporary further subsidence in such areas if large quantities of dredged sediment and soils for beneficial reuse are deposited.

However, BPA 1-26 would increase the beneficial reuse of dredged sediment and the use of excess upland soils to restore appropriate elevations to subsided diked baylands in order to establish tidal marsh and adapt to rising seas, which in turn would preserve, restore, and enhance bay and shoreline habitats.

H. Greenhouse Gas Emissions

Impact Questions	Significance Determinations
Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	LTSI
Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	NI

BPA 1-26 would indirectly lead to increased beneficial reuse of dredged sediment and increased use of excess upland soils to preserve, restore, and enhance bay and shoreline habitats and improve the shoreline's resilience to rising seas.

BPA 1-26 may lead to increased greenhouse gas (GHG) emissions due to the transportation of dredged sediment and soils to restoration sites around the Bay shoreline, in comparison to the GHG emissions currently resulting from in-Bay or ocean disposal of dredged sediment. BPA 1-26 may also lead to increased GHG emissions due to emissions of hydrocarbons and nitrous oxides from construction equipment used to place dredged sediment and soils at a restoration site. However, these additional impacts would occur only during delivery of sediment and soils. In the absence of specific beneficial reuse proposals or knowledge of the extent to which the future projects may increase beneficial reuse of dredged sediment and soils, it would be speculative to attempt to analyze or quantify any increase in GHG emissions from these sources.

In addition to providing habitat and food for fish and wildlife, wetlands offer long-term climate benefits, including sequestering atmospheric carbon through photosynthesis. The carbon is stored in plants, organic rich soils, and sediments. The sequestration of carbon in the restored wetlands that beneficially reuse sediment and soils will likely

offset increases in GHG emissions from the increased transportation and placement of dredged sediment and soils at restoration sites and continue to provide these benefits into the future.

Without specific details on the emissions, locations of projects, and the acreage and types of vegetation, it would be speculative to analyze any potential increases in GHG emissions, or the potential carbon sequestration benefits, that may result from BPA 1-26. BPA 1-26 will not directly or indirectly approve any specific beneficial reuse or habitat restoration projects. All such future projects will need to undergo environmental review and comply with potential mitigation requirements.

I. Hazards and Hazardous Materials

Impact Questions	Significance Determinations
Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	NI
Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	NI
Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	NI
Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	NI
For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	NI
Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	NI
Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	NI

BPA 1-26 would not result in the increased transportation of hazardous materials because all dredged sediment eligible for wetlands restoration will be tested to ensure it is suitable for placement. Only sediment which is deemed suitable for beneficial reuse will be transported to a restoration site.

J. Hydrology and Water Quality

Impact Questions	Significance Determinations
Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	NI
Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	NI
Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	
result in substantial erosion or siltation on- or off-site?	LTSI
substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite?	LTSI
create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	NI
impede or redirect flood flows?	LTSI
Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	NI
Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	NI

BPA 1-26 may indirectly result in changes to wastewater discharge, existing drainage patterns, flows of streams or creeks, and flood flows in ways that would improve and positively impact the functioning of the Bay's tributaries, wetlands, and shoreline. BPA 1-26 is intended to support restoring surface elevations of subsided baylands through the placement of dredged sediment and soils for rapid vegetation and sea level rise adaptation and resilience. Thus, BPA 1-26 is likely to result in improved habitat development and altered drainage of a site once restoration occurs through development of primary and secondary channels. These new waterways would support exchange of Bay waters via tides and currents, as well as fish and wildlife in restored marshes. BPA 1-26 may also indirectly result in the re-alignment of streams, creeks, and flood protection channels that have been altered over time to more natural systems that better support water and sediment flow into wetlands and the Bay, while improving flood water capacity via absorption in these newly connected wetlands and improved tributaries, thus reducing flooding to adjacent developed areas. BPA 1-26 would not

result in ground water recharge impediments, violations of wastewater discharge requirements, release of pollutants, or conflicts with a water quality control plan.

All dredged sediment and soils eligible for wetlands restoration will be tested to ensure such materials are suitable for placement. Only sediment and soils which are deemed suitable for beneficial reuse will be transported to, and placed on, a restoration site.

At this time, BCDC does not have information about the location of future projects that may be proposed in local jurisdictions and that will need to be consistent with the new and revised Bay Plan policies and, therefore, cannot describe the specific potential impacts of beneficial reuse of dredged sediment and soils to water quality or other hydrological impacts. All such future projects will need to undergo environmental review and comply with mitigation requirements imposed by BCDC or other agencies with jurisdiction.

K. Land Use and Planning

Impact Questions	Significance Determinations
Would the project physically divide an established community?	NI
Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	NI

BPA 1-26 would indirectly result in increased beneficial reuse of dredged sediment and the use of excess upland soils to preserve, restore, and enhance bay and shoreline habitats and improve the shoreline's resilience to rising seas. BPA 1-26 would not result in the physical division of an established community nor conflict with any land use plan, policy, or regulation adopted for purposes of avoiding or mitigating an environmental effect. In fact, the restoration and enhancement of wetlands in the San Francisco Bay region is likely to support existing land use plans and policies to protect and preserve the shoreline and associated open space and public access, especially in light of rising seas.

L. Mineral Resources

Impact Questions	Significance Determinations
Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	NI
Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	NI

BPA 1-26 would have no impact on the availability of mineral resources.

M. Noise

Impact Questions	Significance Determinations
Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTSI
Would the project result in generation of excessive ground borne vibration or ground borne noise levels?	NI
For a project located within-the vicinity of a private airstrip or-an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	NI

It is possible that the work associated with the placement of dredged sediment and excess upland soils for wetlands restoration could result in some temporary increase in ambient noise levels in the surrounding areas. BPA 1-26 may also result in increased transportation via water and land of the dredged sediment and excess upland soils, subjecting surrounding areas to some increase in noise levels.

However, at this time, BCDC does not have information about the location of future projects that may be proposed in local jurisdictions and that will need to be consistent with the new and revised Bay Plan policies. Therefore, BCDC cannot describe the specific potential noise impacts at particular locations.

N. Population and Housing

Impact Questions	Significance Determinations
Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	NI
Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	NI

BPA 1-26 would indirectly result in increased beneficial reuse of dredged sediment and the use of excess upland soils to preserve, restore, and enhance bay and shoreline habitats and improve the shoreline's resilience to rising seas. BPA 1-26 would not create a demand for new housing nor displace substantial numbers of existing people or housing. In fact, BPA 1-26 is intended to help preserve shoreline structures and

infrastructure, including housing, by adopting policies to promote protecting the shoreline against rising sea levels.

O. Public Services

Impact Questions	Significance Determinations
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	NI
Fire protection?	NI
Police protection?	NI
Schools?	NI
Parks?	NI
Other public facilities?	NI

BPA 1-26 would indirectly result in increased beneficial reuse of dredged sediment and the use of excess upland soils to preserve, restore, and enhance bay and shoreline habitats and improve the shoreline's resilience to rising seas. BPA 1-26 would not result indirectly in a greater demand for public services beyond that which already exists. BPA 1-26 also would not result in a need for altered or new facilities to provide law enforcement, fire protection, educational, or other public services.

P. Recreation

Impact Questions	Significance Determinations
Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	LTSI
Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	NI

BPA 1-26 would indirectly result in increased beneficial reuse of dredged sediment and the use of excess upland soils to preserve, restore, and enhance bay and shoreline habitats and improve the shoreline's resilience to rising seas. It is expected that wetlands protection and restoration will result in benefits for recreational resources due to

improved wildlife habitat, open space, water quality, flood protection, and other environmental benefits. By encouraging restoration of Bay habitats through greater beneficial reuse of dredged sediment, BPA 1-26 may indirectly result in an increase in public access and other recreational opportunities along the Bay shoreline. At this time, BCDC has no information concerning the potential locations where such public access or other recreational opportunities may be located in connection with future restoration projects.

Q. Transportation

Impact Questions	Significance Determinations
Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	LTSI
Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	NI
Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	NI
Would the project result in inadequate emergency access?	NI

BPA 1-26 could indirectly result in increased water-based transportation of dredged sediment. BPA 1-26 may also result in increased roadway traffic from trucks transporting dredged sediment from flood control projects or excess upland soils to restoration sites that include beneficial reuse. Thus, it is possible that BPA 1-26 could lead to increased use of water- or land-based transportation corridors and result in new or modified roads and other corridors. BCDC does not have information about the locations of future projects nor the transportation demands of future projects. For future projects, project proponents will be required to identify and evaluate potential transportation impacts during the CEQA process.

R. Tribal Cultural Resources

Impact Questions	Significance Determinations
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	NI

Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	NI
A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	NI

BPA 1-26 would have no substantial adverse impact on tribal cultural resources. While implementation of future wetlands restoration projects could result in potential impacts to tribal cultural resources, if such resources were found at the restoration site, such impacts would be identified, evaluated for, and any necessary mitigation measures developed, during environmental review and permitting of the restoration site. Commission staff sent two separate consultation invitations to 53 different Bay Area Native American tribes⁴, the first during the conceptual policy development phase and the second following the Commission's vote to initiate BPA 1-26.

On March 12, 2026, Commission staff sent approximately 100 consultation invitations by electronic mail and 100 by regular mail to 53 different tribes, informing tribes of BPA 1-26 and inviting early input on BPA 1-26.

On May 21, 2026, Commission staff again sent approximately 100 consultation invitations along with project summaries to 53 different tribes by electronic mail and 100 by regular mail, inviting tribes to meet with Commission staff to discuss BPA 1-26 and share any information regarding possible impacts to tribal cultural resources due to BPA 1-26.

Seven tribes responded to Commission staff. Two tribes expressed no desire to consult, and five tribes expressed a desire to consult on BPA 1-26. As of September 11, 2026, Commission staff held individual consultation meetings with four of the interested tribes, and two consultation meetings with the other interested tribe for a total of six consultation meetings.

⁴ Commission staff contacted the Native American Heritage Commission (NAHC) for assistance with identifying tribes with historical and traditional ties to the San Francisco Bay and shoreline, and added to NAHC's contact list by conducting additional research to ensure adequate outreach. Commission staff then contacted those tribes identified by NAHC and staff's research.

In consultation meetings with those five tribes which expressed interest in consulting with BCDC, tribes generally expressed support for BPA 1-26 and its focus on wetland restoration. One tribe expressed interest in learning more about how to obtain dredged sediment for shoreline restoration projects of interest to that tribe. Although Commission staff explained to this tribe that this request was outside of the scope of BPA 1-26, Commission staff connected the representatives of this tribe with the appropriate Commission staff and local City or County staff responsible for developing a subregional shoreline adaptation plan pursuant to Senate Bill (SB) 272 (Laird 2023) and BCDC's Regional Shoreline Adaptation Plan (RSAP), as well as shared information about potential funding sources for such project(s).

One tribe expressed interest in working with Commission staff to create and potentially include signage materials at BCDC-permitted public access locations regarding certain tribes' histories of living in the Bay Area since time immemorial. The tribe provided Commission staff with reports substantiating such tribes' use of the Bay since time immemorial, and the existence of tribal cultural resources potentially within or close to BCDC's jurisdiction. Although Commission staff explained to this tribe that this proposal was outside of the scope of BPA 1-26, Commission staff offered to connect the representatives of this tribe with BCDC's Public Access team to further discuss the tribe's ideas regarding signage.

With respect to future dredging projects, two tribes expressed interest in working with Commission staff to create educational outreach materials or trainings regarding the potential existence of tribal cultural resources in Bay sediment through the subregional shoreline adaptation planning process at the local government level. Commission staff explained that monitoring for impacts to tribal cultural resources as a result of a dredging project occurs on a project-by-project basis and that mitigation for impacts to tribal cultural resources would be addressed during the environmental review process for a specific dredging project.

No tribe identified any significant adverse impacts to tribal cultural resources as a result of BPA 1-26, but two tribes expressed interest in the possibility of including a finding BPA 1-26 to acknowledge tribes' histories of living in the Bay Area since time immemorial and the potential existence of tribal cultural resources in Bay sediment. To this effect, BPA 1-26 contains proposed *Sediment Management* Finding B and upon mailing the Preliminary Staff Recommendation, staff will reach out to the tribes consulted with to make them aware and invite their feedback and collaboration on BPA 1-26.

S. Utilities and Service Systems

Impact Questions	Significance Determinations
Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	NI
Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	NI
Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	NI
Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	NI
Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	NI

BPA 1-26 would have no impact on public utilities or service systems.

T. Wildfire

Impact Questions	Significance Determinations
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	NI
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	NI
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	NI
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	NI

BPA 1-26 would not result in impairments to an adopted emergency response or evacuation plan or exacerbation of wildfire risks. Nor is it reasonably foreseeable that BPA 1-26 would require the installation or maintenance of infrastructure that may exacerbate wildfire risk or increased exposure to significant risks, such as flooding or landslides.

U. Mandatory Findings of Significance

Impact Questions	Significance Determinations
Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	LTSI
Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	LTSI
Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	NI

It is possible that BPA 1-26 may result in temporary disturbances to wildlife and habitat during the processing of dredged sediment and when such dredged sediment is placed at a restoration site. However, BPA 1-26 is likely to result in long-term benefits to wildlife and habitat as BPA 1-26 is intended to create, preserve, and enhance wetland habitats through beneficial reuse of dredged sediment and soils. It is also possible that in encouraging greater beneficial reuse of dredged sediment and excess upland soils for bay habitat restoration projects, BPA 1-26 would indirectly result in temporary, construction-related adverse impacts to the environment at restoration sites as a result of the placement of dredged sediment or soils. However, BPA 1-26 is expected to result in net benefits to the quality of the environment because it is intended to result in restoration and enhancement of wetlands in the San Francisco Bay region for purposes of shoreline resiliency and adaptation to rising sea levels.