Gabrielle Geller

10/30/24

NMFS, Office of Protected Resources, Permits and Conservation Division

Dear Chief Jolie Harrison,

My name is Gabrielle Geller and I am a marine affairs and environmental policy student at the University of Miami. I am writing this comment to express concern regarding the potential negative environmental impacts of renewing the Incidental Harassment Authorization (IHA) for PG&E's sediment remediation project in San Francisco Bay. I believe that the minor changes in the project scope, including the addition of four more piles and continued pile driving activities will cumulatively increase stress on the local mammal populations, despite the stated "negligible impact."

While the scope of the renewal is very consistent with the original IHA, the expansion from 8 to 10 piles of both 24 and 36 inch sizes could result in increased noise and disturbance in the bay. This could lead to potential harm to important marine mammal species including harbor seals, California sea lions, and harbor purposes, as these species are very vulnerable to human disruptions. Even though the marine mammal take is limited to Level B harassment, the ongoing exposure to the pile driving noise over this proposed extended period could cause cumulative behavioral disruptions, displace marine mammals, and interfere with their foraging or reproductive behaviors (Bailey et al., 2010).

I do not think that the proposed mitigation adequately addresses the increased pile driving activities and their potential to intensify the negative impact on marine life. Due to the lengthened project timeline, the sensitive marine ecosystem of San Francisco Bay, and the increased pile installations, NMFS's preliminary determination that the project qualifies for a Categorical Exclusion under the National Environmental Policy Act (NEPA) should be reconsidered to accurately determine any long-term effects. Pile driving could have negative implications for water quality, noise pollution, and long term ecosystem health, warranting an environmental review process and impact statement for this project. The mitigation efforts proposed by NMFS and PG&E, such as using the vibratory pile driving, requiring pre- and post-monitoring, as well as shutdown zones for the marine mammals are a positive aspect of the IHA. The monitoring and reporting data is crucial for assessing the impact of the activities for adjusting future plans. I support the environmental goal of sediment remediation, but am concerned about the potential impact that this renewal may have on sensitive mammals. Thank you for your time and consideration.

Sincerely,

Gabrielle Geller