

STATEMENT OF FINDINGS
South Jetty Breach Fill Maintenance
Fiscal Year 2012-2013
Westport, Grays Harbor County, Washington

1. Project Description. This Statement of Findings concerns a decision by the U.S. Army Corps of Engineers, Seattle District (Corps), to conduct maintenance of the breach fill (sand spit) that connects the South Jetty with the adjacent land mass to the south, at Westport in Grays Harbor County, Washington for FY2012-2013. This work is intended as an interim action to help maintain the status quo until the long-term maintenance strategy can be implemented. Thus the scope of the work will be of a smaller scale in nature of materials placed and total project cost. The work will consist of placing approximately 30,000 cubic yards of material on the South Beach placement site located on the South Beach side of the sand spit. Material will be placed on the 2.2-acre footprint labeled "FY12 South Beach Placement Site" in Figure 1. Little, if any, native dune grass vegetation will be disturbed by the transportation and sand placement activities. The haul route will be on existing access roads or in areas devoid of vegetation. To minimize effects to the ecology of the intertidal area the Corps will ensure that the composition of the upland source material will be of the same character as the existing breach fill material, through contract specifications requiring that the grain size and other pertinent characteristics of the placed sand match the characteristics of the existing sands in the breach fill and nearshore area. Placement material will be trucked to the breach fill area from an upland quarry and end dumped into the placement area. Material will be of similar grain size as historic breach fill placements using marine sediments and will also meet chemical criteria for Puget Sound marine sediment quality standards listed in WAC 173-204-320. All material will be placed above mean higher high water (+9 feet mean lower low water). Thus, no material will be placed in the water, preserving existing water quality.

2. The Supplemental Environmental Assessment Fiscal Years 2012 through 2018 South Jetty Breach Fill Maintenance Westport, Grays Harbor County, Washington August 2012 (EA) established specific thresholds, each with a corresponding responsive action in order to make use of readily measurable and objectively verifiable indicators of risk of a breach occurring. The triggering thresholds were set at a level that permits the Corps adequate response time to procure and implement sand placement once the thresholds are reached. The Corps conducts periodic inspections (approximate three-month intervals) of the breach fill area to determine when the triggering thresholds are achieved. The action-triggering threshold for this FY 2012-2013 (Threshold No. 2) and corresponding response from the EA for overtopping events is characterized as follows:

a. Threshold No. 2

The breach fill footprint south of South Jetty is overtopped by water from the west, resulting from one or more storm events.

b. Responsive Action No. 2

Placement of clean sand of the same character (similar grain size and other pertinent

characteristics) as the material in the breach fill area in a footprint of up to 2.2 acres located within the 7.6 -acre South Beach placement site, landward of elevation +9 feet MLLW (the mean higher high water [MHHW] contour) at a location within the placement footprint depicted in Figure 1. Any quarry supplying the sand material would be required to meet the relevant sand grain size and other characteristics of the marine sands presently comprising the breach fill and nearshore area. The precise location and quantity of placed sand would be selected based on an analysis of the most effective means of responding to the observed overtopping conditions and the most efficacious means of addressing the risk of further overtopping and head-cutting. The sand would be excavated or obtained from another suitable upland source, and truck-hauled on the existing state park access road. Placement within the fill footprint would utilize either track vehicles that require no improved road or trucks, by constructing a temporary access route using removable steel plates. No in-water work would be performed. Care would be taken to minimize impacts to any dune grass present in the South Beach placement site.

3. The proposed Fiscal Year (FY) 2012 action was determined necessary when water overtopped the breach fill area immediately south of the jetty during the winter storm seasons 2010/2011 and 2011/2012 (Threshold No. 2). This resulted in the erosion of the sand berm placed in October 2010 approximately 100 feet south of the jetty. Successive channels were cut through the nourishment area during periods of large storm surge and wave setup, first observed after a large storm in November 2010 (Figure 2), and subsequent surveys determined that approximately a third of the material (6,700 cy) was eroded. Approximately 30,000 cubic yards of sand material is needed to reestablish the dune height to the adjacent dune height of +35 feet above mean lower low water. The Supplemental EA, dated August 2012 and incorporated by reference, describes the effects of the proposed sand placement.

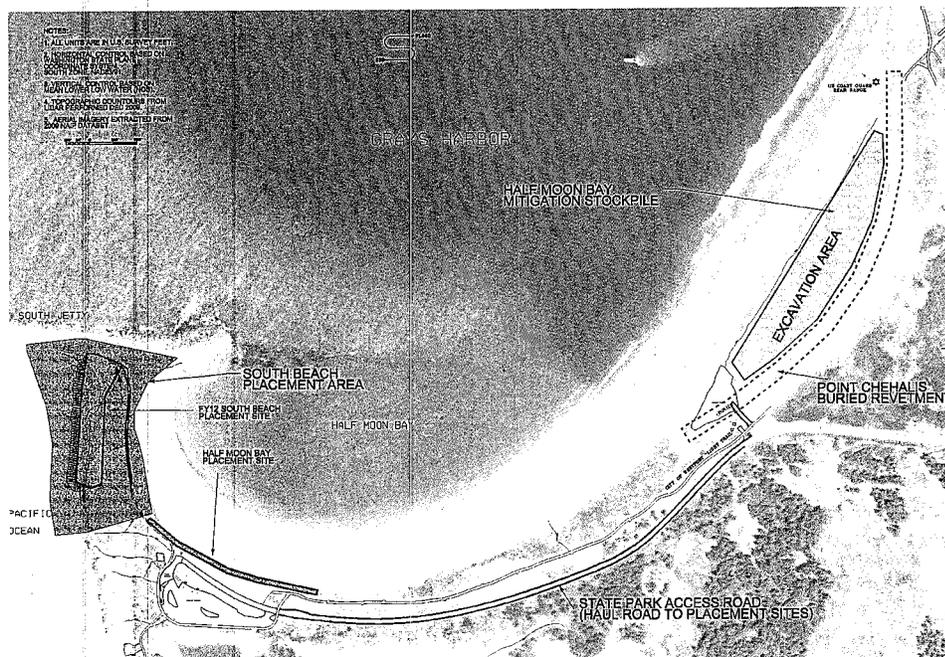


Figure 1. 2.2 acre FY12 sand placement site.



Figure 2. Channels formed in nourishment area following 31 October 2010 storm event.

4. Factors for Consideration. I have reviewed the proposed work in light of the overall public interest. All factors relevant to the proposed work were considered in accordance with applicable regulations. These factors include but are not limited to conservation, economics, esthetics, general environmental concerns, historic values, fish and wildlife values, flood damage prevention, land use, navigation, recreation, water supply, water quality, energy needs, safety, food production, and in general, the needs and welfare of the people. My review includes evaluation of maintenance work as considered in the enclosed Supplemental EA with associated Endangered Species Act (ESA) compliance, Coastal Zone Management Act (CZMA) consistency determination, and Finding of No Significant Impact (FONSI), incorporated by reference.

5. Evaluation Points. The EA provides analyses of the effects of the proposed work. In coordinating the project, the Corps solicited comments via a Notice of Preparation. There was one comment on the Notice of Preparation. The U.S. Environmental Protection Agency suggested that the Corps include direct pumping of dredge material onto the breach fill area in future operations. The Corps included an analysis of pumping sand material from the maintenance dredging directly onto the breach fill area and concluded that this option would be too costly for the scale of the 30,000 cy placement and would not achieve the economy of scale required to justify the mobilization of such dredge equipment. This however does not preclude this alternative from consideration in the long term management strategy. In the context of the interim action scope, direct pump ashore was also determined to have greater negative effects on the environment than obtaining sand material from an upland source and transporting the material by truck to the placement site.

a. Federal Agencies.

(1) The United States Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, and the U.S. Fish and Wildlife Service are responsible for the ESA listed species in Grays Harbor. Since the project will not put sand in the water, construction will not occur in the water, sand will not be placed where snowy plover occur, and work will not occur where snowy plover are found, the Corps concluded that the project will have “no effect” on ESA listed species; thus the proposed work complies with the ESA. Since all construction will be in the upland the project will have no adverse effect on essential fish habitat and does not require consultation, and thus complies with the Magnuson-Stevens Fisheries Conservation Act.

b. Local and State Agencies. No comments were received from local agencies.

(1) Sand placement would fall completely within the footprint of the previously authorized breach fill, and would utilize marine sands dredged from navigation channel sources identical to the existing sands, or sands derived from a suitable upland source meeting the same pertinent characteristics. As the sand placement would not alter the character, scope, or design of the initial 1994 breach fill placement, the proposed action would constitute maintenance of a dike or similar structure, as the breach fill was constructed as an engineered barrier between the Pacific Ocean on one side, and Half Moon Bay and the infrastructure of the City of Westport on the other. Thus, the breach fill is an engineered structure designed to control water, and such placements of material for repair and maintenance purposes are exempt from the requirements of Section 404 under Section 404(f)(1)(B) of the Clean Water Act. Because no work subject to regulation under Section 404 is being conducted, a Section 401 certification is not required. Ecology previously concurred with a Corps 2004 CZMA consistency determination and has renewed that 2004 consistency concurrence via email dated 24 August 2012.

c. Treaty Indians.

(1) The project is adjacent to Westport and will be conducted in the upland and thus will not interfere with any of the Quinault Indian Nation fishing activities. Regardless, the Corps will continue to coordinate with the Quinault Indian Nation concerning this project in furtherance of meeting our Tribal Treaty obligations.

d. Other Evaluation Points:

(1) No wetland areas will be affected and there will be inconsequential effect to water and air quality by the proposed work because no work or material will enter the water and any effects to air quality will be de minimis.

(2) No cultural resources are located within the sand placement sites and, therefore, the project has no potential to affect cultural resources.

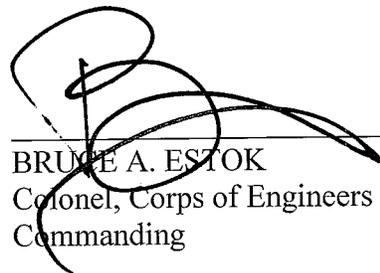
6. Preparer. This document was prepared by Mr. Robert Donnelly, Environmental Coordinator, Environmental and Cultural Resources Branch, in coordination and consultation with Ms. Elizabeth Chien, Project Manager, Navigation Section; Mr. Craig Juckniess, Counsel, Office of Counsel; Mr. Matt Harrington, Section Chief, Aquatic Resources Section; and Mr. Evan Lewis, Chief, Environmental and Cultural Resources Branch.

7. Summary Conclusion. I have concluded that the proposed work conforms to objectives by minimizing or avoiding impacts on these environmental considerations and not significantly affecting fish and wildlife, water quality, or the ecology of the area.

8. Summary of Findings. I have given full consideration to the impact of failure to maintain the South Jetty Breach Fill on the national as well as regional economy. This project is necessary to protect the integrity of the South Jetty which is integral to maintaining the features of the Grays Harbor and Chehalis River Federal Navigation project. This project conforms to the Corps requirement to implement the least costly, environmentally acceptable action consistent with engineering requirements established for the project, as well as national policy, statutes and administrative directives. I find that the public interest would be served by the placement of sand on the South Beach placement site.

Date

20 Sep 2012



BRUCE A. ESTOK
Colonel, Corps of Engineers
Commanding