

Memorandum for Record**September 6, 2023****Subject: Tier 1 Antidegradation for Pacific Shellfish, South Bend LLC Facility Maintenance Dredging in South Bend, Washington (NWS-2012-1350-1)****Introduction**

This memorandum documents the Tier 1 antidegradation evaluation conducted by the Dredged Material Management Program (DMMP) agencies (U.S. Army Corps of Engineers, Washington Departments of Ecology and Natural Resources, and the U.S. Environmental Protection Agency).

Project Description

Pacific Shellfish, South Bend LLC (Pacific Shellfish) proposes to conduct maintenance dredging in the intertidal area along the existing dock and pier at the South Bend facility (See Sheet 1) to maintain safe navigational depths and allow access to this existing infrastructure. Pacific Shellfish would dredge two consecutive runs of minus tides twice a year, once in January or early February then again in August or September. If necessary, Pacific Shellfish may dredge in other months that are allowed by the permit. The total amount of sediment (sand, mud, oyster shell, etc.) to be dredged in any single year is 800 cubic yards (cy). Over a 10-year period, up to 8,000 total cy may be dredged at this location (See Sheets 2, 3, and 4). All maintenance dredging will be in the “dry” during a low tide event using an excavator with a clamshell bucket. The work start date is as soon as possible, and work will continue for a 10-year period. No phasing is included in this Project. The same action was approved in 2014 (NWS-2012-1350) for a 10-year period, under the name “Coast Seafoods Company”.

Maintenance dredging will occur during low tide, when the site is not inundated, and no fish are present. Residual water in the sediments will be dewatered as the bucket excavates and transfers the individual load to the dump truck, which occurs with all dredging operations. Dredging techniques (i.e., dredging in the dry) will avoid the effects of suspended sediments and turbidity. All dredged material will be deposited and retained in an area that has no waters of the United States.

Tier 1 Evaluation

Available data were obtained and reviewed by the Dredged Material Management Office (DMMO) to evaluate the project location’s sediment chemical quality and understand whether sources of contamination could have historically impacted or currently be impacting the project site. The following resources were reviewed to conduct this evaluation:

1. Previous studies, suitability determinations or antidegradation assessments conducted by DMMO or other agencies. A Tier 1 No Test Memo, that covered a 10-year maintenance dredging permit (NWS-2012-1350), was issued in 2013 (DMMP, 2013). The facility name at that time was Coast Seafoods Company. This memo determined that under DMMP guidelines, projects in areas of “low” concern with less than 8,000 cubic yards of material and with little reason to believe that unacceptable adverse effects are possible, meet the “no test” designation. An EIM query was conducted and found no potential local sources.
2. Ecology’s Environmental Information Management (EIM) Database. No sediment data were found within the vicinity of the project.

3. Ecology's "What's In My Neighborhood" Site Cleanup Database. A search was conducted and verified that no new cleanup sites were identified, in the vicinity of the project, since issuing the last dredging permit.
4. Ecology's Spill Map. A search was conducted to look at spills within the last 10 years within 0.5 mile of the project location. No spills were reported.

Antidegradation Determination

Since dredged material is being placed upland, antidegradation was evaluated using the information obtained in the Tier 1 review. Due to the remote location and lack of contaminant sources, the DMMP agencies have determined that no chemical testing of the material is required for this project. The sediment exposed by dredging will likely meet the State of Washington antidegradation standard. This determination is valid for the life of the new 10-year maintenance dredging permit (years 2023-2033) unless a new contaminant source is identified in the project area.

This antidegradation determination does **not** constitute final agency approval of the project. During the public comment period that follows a public notice, resource agencies will provide input on the overall project. A final decision will be made after full consideration of agency input, and after an alternatives analysis is done under section 404(b)(1) of the Clean Water Act.

References

DMMP, 2013. Memorandum For File. *Tier 1 Suitability of Coast Seafoods Willapa Facility Maintenance Dredging, Willapa Bay, WA (NWS-2012-1350) With Upland Disposal and Dewatering to Willapa Bay*. September 4, 2013.

DMMP, 2021. *Dredged Material Evaluation and Disposal Procedures (User Manual)*. Dredged Material Management Program, updated July 2021.

Ecology's EIM Database Search: <https://apps.ecology.wa.gov/eim/search/default.aspx>

Ecology's What's in My Neighborhood Search: <https://apps.ecology.wa.gov/neighborhood/>

Ecology's Spill Incidents Database: <https://ecology.wa.gov/Spills-Cleanup/Spills/Spill-preparedness-response/Responding-to-spill-incidents/Spill-incidents>

Washington State's JARPA Form for # NWS-2012-1350-1 provided to USACE Regulatory Department.

Agency Signatures

The signed copy is on file in the Dredged Material Management Office, Seattle District U.S. Army Corps of Engineers

Date Joy Dunay – U.S. Army Corps of Engineers, Seattle District

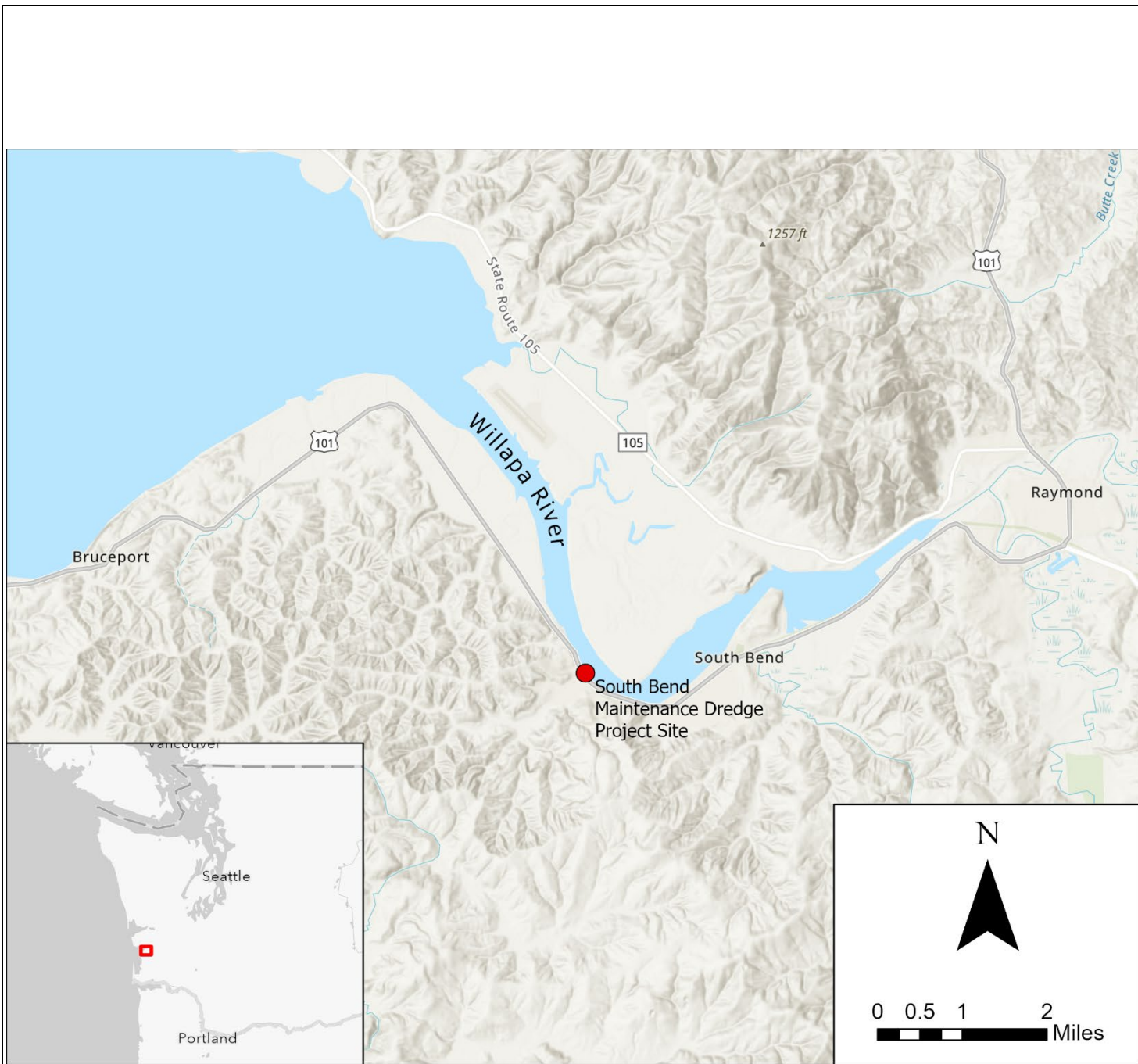
Date Justine Barton – U.S. Environmental Protection Agency, Region 10

Date Laura Inouye, PhD. – Washington State Department of Ecology



Date Shannon Soto – Washington State Department of Natural Resources

Copies Furnished:

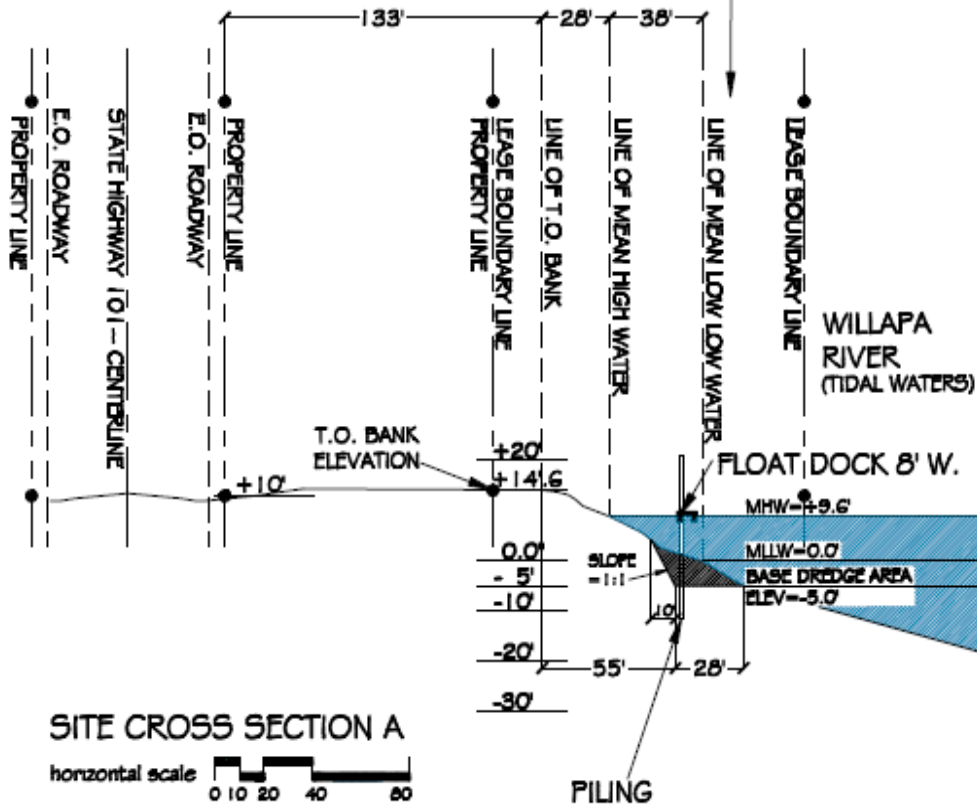
- DMMP agencies
- Brad Johnson, USACE Regulatory Project Manager
- Kyle Deerkop, Pacific Shellfish, South Bend LLC
- Marlene Meaders, Confluence Environmental Company
- DMMO File



VICINITY MAP

Applicant: Pacific Shellfish South Bend LLC	Project Name: South Bend Maintenance Dredging	 CONFLUENCE ENVIRONMENTAL COMPANY 146 N Canal St, Suite 111, Seattle WA 98103 www.confenv.com
In: Willapa River Near/At: South Bend County: Pacific State: WA	Project Location: 1200 Robert Bush Drive South Bend, WA 98586	
Adjacent property owners: 71018020002, 71032001007, 71032001100, 71022001000 Dulcich Realty LLC, 16797 SE 130th Ave, Clackamas, OR, 97015	Latitude: 46.66713 N Longitude: 123.81222W 	Datum: NA
	Sheet 1 of 4	Date: August 14, 2023

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PARCEL B





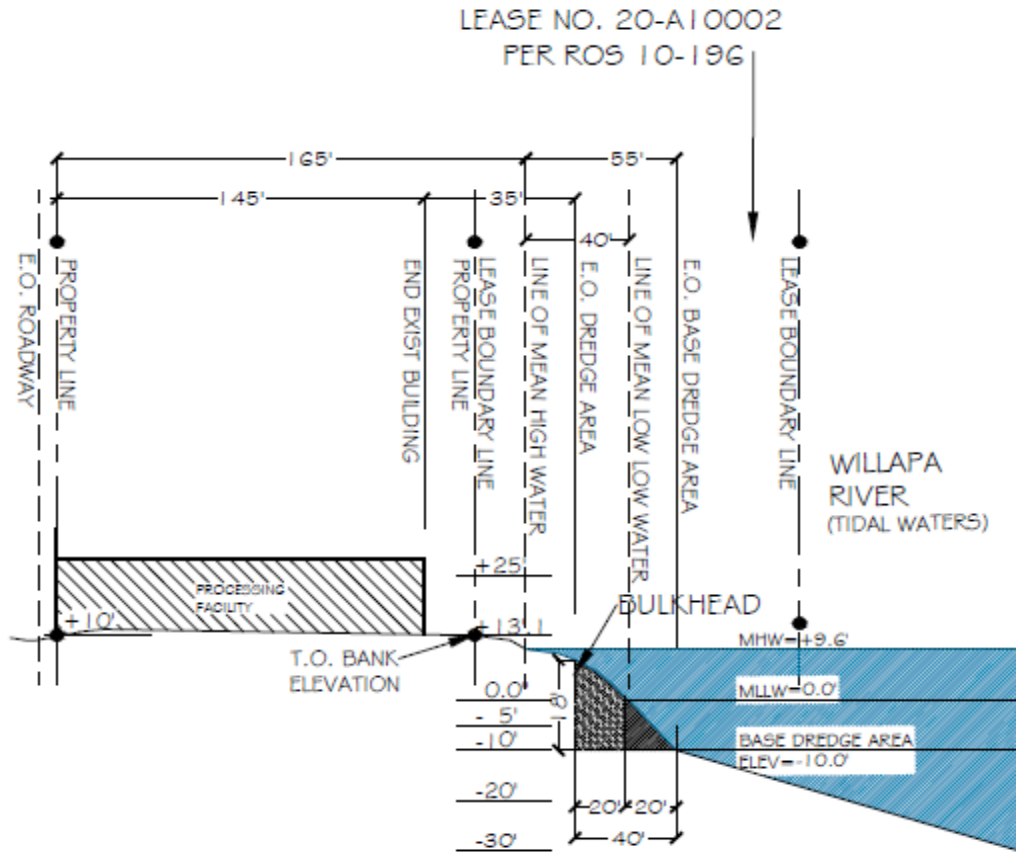
SITE CROSS SECTION A



NOTES:



- Permit for maintenance dredging is requested for a 5-year period
- Dredging to occur annually
- Quantity of ~800 cubic yards annually for a total of up to 4,000 cubic yards
- Material is sand, mud, and oyster shell - to be hauled upland for dewatering and disposal

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SITE CROSS SECTION B



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