

**MEMORANDUM FOR RECORD**

**July 16, 2020**

**SUBJECT: CLARIFICATION OF APRIL 9, 2020 DMMP RECENCY EXTENSION FOR DREDGING AT THE PORT OF GRAYS HARBOR WESTPORT MARINA (NWS-2017-212) WITH BOTH OPEN-WATER AND UPLAND DISPOSAL.**

1. **INTRODUCTION.** This memorandum clarifies the subject decision document to reflect additional construction options for the Port of Grays Harbor for continued dredging of the Westport Marina (Figures 1 and 2). It reflects the consensus determination of the Dredged Material Management Program (DMMP) agencies (U.S. Army Corps of Engineers, Environmental Protection Agency, and Washington Departments of Ecology and Natural Resources) regarding the application of the DMMP recency guidelines to remaining dredged material at the marina. Proposed disposal is either at the Point Chehalis DNR dispersive open-water disposal site, or upland at a Port-owned property adjacent to the marina.
2. **BACKGROUND AND PURPOSE OF CLARIFICATION.** As described in the April 9, 2020 document (DMMP 2020), dredging of the Westport Marina was partially completed during the 2019 – 2020 dredge season. Two different contractors were used (Bergerson Construction and Pacific Pile & Marine (PPM)), as well as two different placement sites: (1) an upland disposal site, created on an adjacent Port-owned property for material unsuitable for open-water disposal, and (2) the nearby existing Point Chehalis open-water disposal site for material suitable for open-water disposal (Figure 3). Only 48,258 CY were dredged out of the project’s originally proposed 245,000 CY characterized volume (see Table 1).

**Table 1. Westport Marina 2019 - 2020 Dredging**

<b>Area Dredged</b>	<b>Volume (CY)</b>	<b>Placement</b>
Unsuitable DMMUs 7,9,12	21,810	All upland (by Bergerson)
Suitable DMMUs 2 and 5, and partial 1 and 4	26,448	11,093 cy upland (by Bergerson) 15,355 cy open-water (by PPM)

For upcoming planning and contracting purposes, the Port of Grays Harbor has requested further clarification of the condition stated in DMMP 2020. That condition stated, “...the DMMP will extend the recency period with a condition: **all material from DMMU 8 and from DMMU 13 must be placed in the upland site.**” With their current budget and schedule, the Port will likely not be able to dredge the full proposed marina dredge prism. The Port also will probably see bids from both hydraulic and clamshell dredgers, and the available equipment will likely affect the final dredge prism. The DMMP agreed to consider the condition more carefully, under the recency guidelines, to determine whether further clarification was possible.

3. **RECENCY ANALYSIS: DMMUS 8 AND 13.** The condition stated in DMMP 2020 that ALL material in both DMMUs 8 and 13—in the absence of further testing--should be disposed upland. At the Port’s request, we considered two questions:
  - 1) *Does this condition mean that the entire dredge prism MUST be removed?*
  - 2) *Are there any parts of these DMMUs that could be considered suitable for open-water disposal without further testing?*

**The answer to question 1) is no.** This DMMP characterization applies only to suitable placement locations for dredged material (i.e. upland or open-water), not on whether any given material is actually removed.

**The answer to question 2) is yes.** The concerns for DMMUs 8 and 13, based on previous data, and on material observed during dredging from neighboring unsuitable DMMUs, have been about the nearshore portions of these units. Dioxins, in particular, appear to have been concentrated in the nearshore areas and are potentially related to a previous marina fire. It is these areas for which the DMMP requires further testing before material can be considered for open-water disposal.

Specifically, the DMMP can consider dredged material waterward of a line drawn at the halfway point between the two core samples in each of DMMUs 8 and 13 as suitable for open-water disposal *without further testing*. That line would be drawn at approximately Station 3+60 in DMMU 8 and Station 2+80 in DMMU 13 (Figures 4 and 5). These boundaries are for the toe of any dredging slopes—no portion of the unsuitable material (located landward of these lines) may be disturbed by dredging or sloughing.

No recency guidelines apply to material to be disposed upland. Thus, all material in both DMMUs can be placed in an upland location without further testing.

- 4. APPLICABILITY OF PREVIOUS DOCUMENTATION.** All other analysis and considerations detailed in previous documents for this project still apply.

- 5. REFERENCES.**

DMMP 2008. *DMMP Clarification Paper: Quality of Post-Dredge Sediment Surfaces (Updated)*. Prepared by David Fox (USACE), Erika Hoffman (EPA) and Tom Gries (Ecology) for the Dredged Material Management Program, June 2008.

DMMP 2015. *Debris Screening Requirements for Dredged Material Disposed at Open-Water Sites*. Final DMMP Clarification Paper. October 02, 2015.

DMMP 2017. *Determination regarding the suitability of proposed dredged material from the Port of Grays Harbor, Westport Marina, Westport, Washington, for placement at the Pt. Chehalis or South Jetty dispersive open-water disposal sites, or at an approved upland site*. January 5, 2017.

DMMP 2018. *Dredged Material Evaluation and Disposal Procedures (User Manual)*. Dredged Material Management Program, updated December 2018.

DMMP 2019a. *DMMP Recency Extension for Dredging at the Port of Grays Harbor Westport Marina (NWS-2017-212) with Both Open-Water and Upland Disposal*. July 11, 2019.

DMMP 2019b. *DMMP Addendum (Dredge Depth Revision) to Suitability Determination for Proposed Dredged Material from the Port of Grays Harbor Westport Marina (NWS-2017-212) For both Open- Water and Upland Disposal*. September 20, 2019.

DMMP 2020. *Second DMMP Recency Extension for Dredging at the Port of Grays Harbor Westport Marina (NWS-2017-212) with Both Open-Water and Upland Disposal*. April 9, 2020.

Ecology 2013. *Sediment Management Standards – Chapter 173-204 WAC*. Washington State Department of Ecology, February 2013.

**6. AGENCY SIGNATURES**

**SUBJECT: CLARIFICATION OF APRIL 9, 2020 DMMP RECENCY EXTENSION FOR DREDGING AT THE PORT OF GRAYS HARBOR WESTPORT MARINA (NWS-2017-212) WITH BOTH OPEN-WATER AND UPLAND DISPOSAL.**

Concur:

7/16/2020

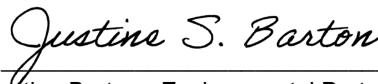
Date



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Lauran Cole Warner - Seattle District Corps of Engineers

7/16/2020

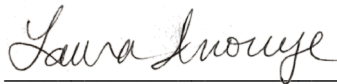
Date



\_\_\_\_\_  
Justine Barton - Environmental Protection Agency

07/16/2020

Date



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Laura Inouye, Ph.D. - Washington Department of Ecology

07/16/2020

Date



\_\_\_\_\_  
Shannon Soto - Washington Department of Natural Resources

Copies furnished:

DMMP signatories

Evan Carnes, Seattle District Regulatory

Randy Lewis, Port of Grays Harbor

Amber Roesler, Moffatt & Nichol

Joe Schumacker, Quinault Tribe



Figure 1 - Vicinity Map

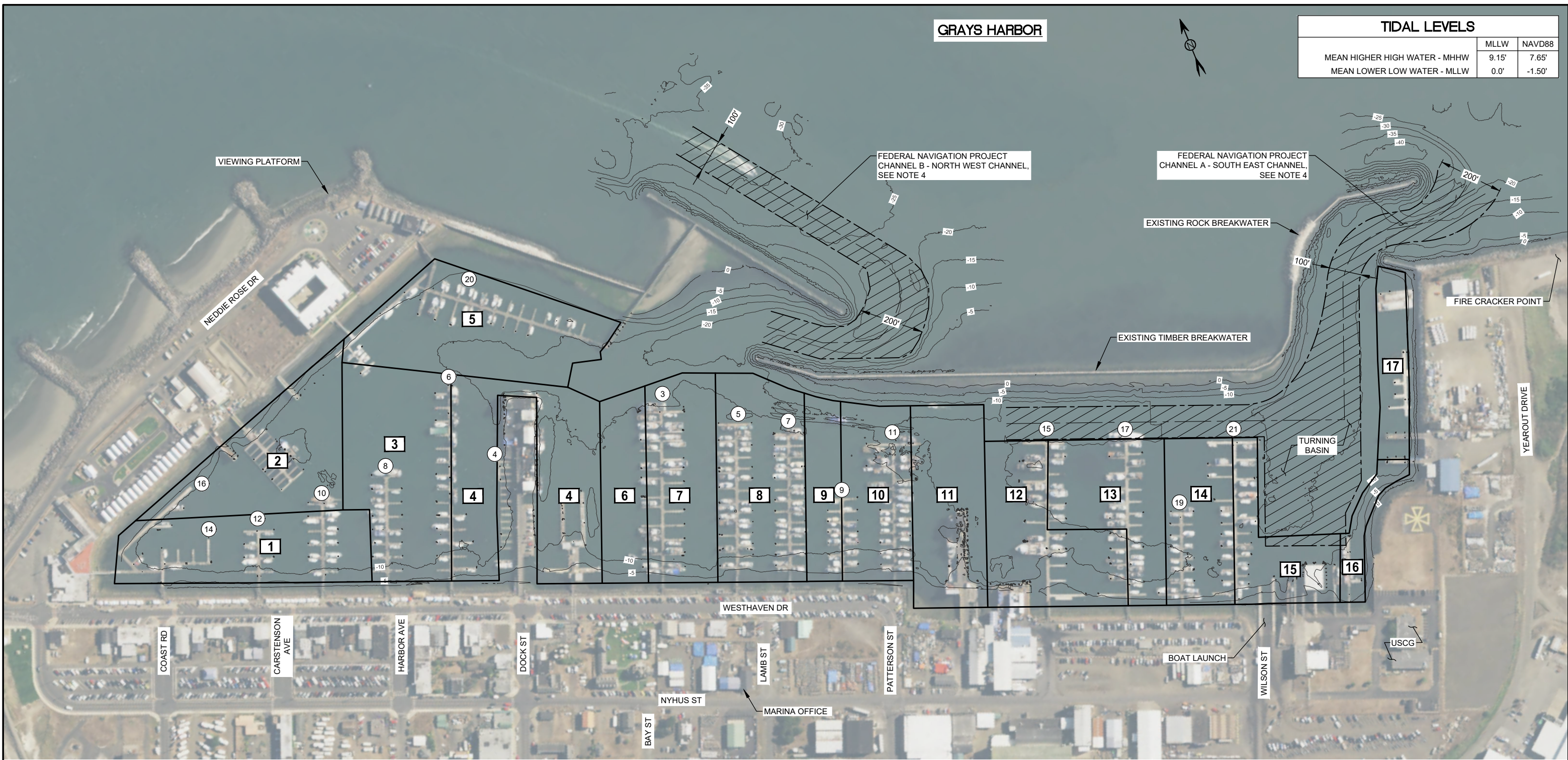
Port of Grays Harbor - Westport Marina Sediment Characterization Report





**GRAYS HARBOR**

TIDAL LEVELS		
	MLLW	NAVD88
MEAN HIGHER HIGH WATER - MHHW	9.15'	7.65'
MEAN LOWER LOW WATER - MLLW	0.0'	-1.50'



- LEGEND**
- # DOCK NUMBER
  - 3 DREDGE MATERIAL MANAGEMENT UNIT (DMMU) NUMBER
  - 5 EXISTING CONTOURS
  - FEDERAL CHANNEL TOE
  - /// FEDERAL CHANNEL

- NOTES**
1. BATHYMETRY DATA IS A COMPOSITE OF TWO USACOE SURVEYS DATED JAN 7, 2017 AND AUG 20, 2018.
  2. AERIAL SOURCE: NAIP 2015
  3. PROJECT IS LOCATED WITHIN THE WESTPORT MARINA DISTRICT AS IDENTIFIED IN THE CITY OF WESTPORT'S COMPREHENSIVE MANAGEMENT PLAN. (ADOPTED APRIL 28, 1998, FINAL DRAFT DATED 4-29-13).
  4. FEDERAL CHANNEL ALIGNMENT IS FROM 2014 USACOE DRAWING AND MAY NOT ACCURATELY INDICATE THE BOUNDARIES OF FEDERAL NAVIGATION PROJECT. FEDERAL NAVIGATION PROJECT IS NOT PART OF THE CURRENT MARINA DREDGING PROJECT.



Figure 2.

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Client

**Port of Grays Harbor**  
On Washington's Pacific Coast

Rev	Date	Drawn	Description	Ch'k'd	App'd
1	4/15/19	CNT	For Bid		

Project Number	B/O	Total
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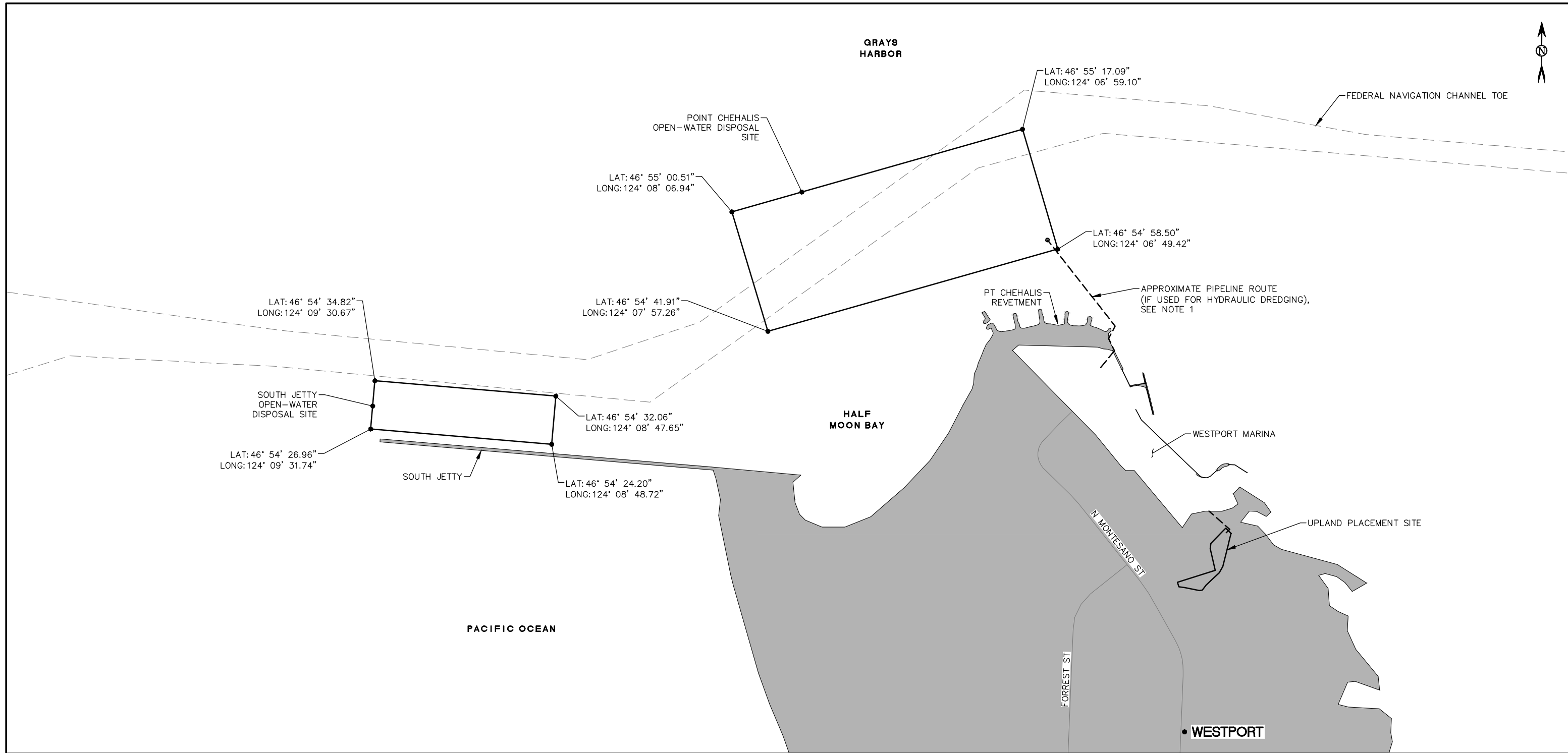
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Drawn	C. Taylor	Coordination	
Dwg check	V. Shepsis	Approved	
Scale at ANSI D	Status	Rev	Security
1"=150'			
Drawing Number			

Title

Westport Marina  
Maintenance Dredging Project  
Final Engineering Design

Existing Site Plan -  
Marina





**LEGEND**

- FEDERAL NAVIGATION CHANNEL TOE
- PIPELINE



**Figure 3.**

**NOTES**

1. SPECIFIC ALIGNMENT OF HYDRAULIC PIPELINE AND LOCATION OF THE DISCHARGE POINT SHALL BE DEVELOPED BY THE CONTRACTOR UPON APPROVAL BY THE PORT AND COORDINATION WITH THE PERMITTING AGENCIES.

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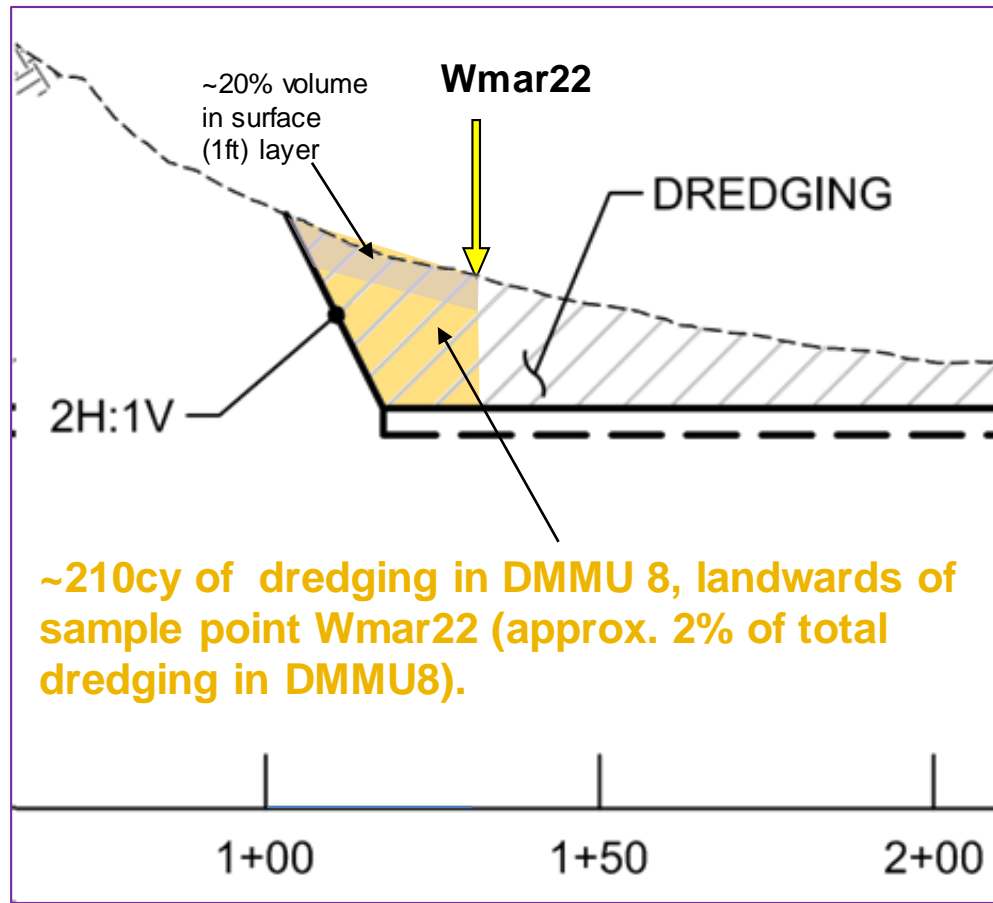
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Drawn	C. Taylor	Coordination	
Dwg check	V. Shepsis	Approved	
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1"=800'			
Drawing Number			

Title

**Westport Marina  
Maintenance Dredging Project  
Final Engineering Design**

**Open-Water Disposal Sites  
And Upland Placement Site**



~210cy of dredging in DMMU 8, landwards of sample point Wmar22 (approx. 2% of total dredging in DMMU8).

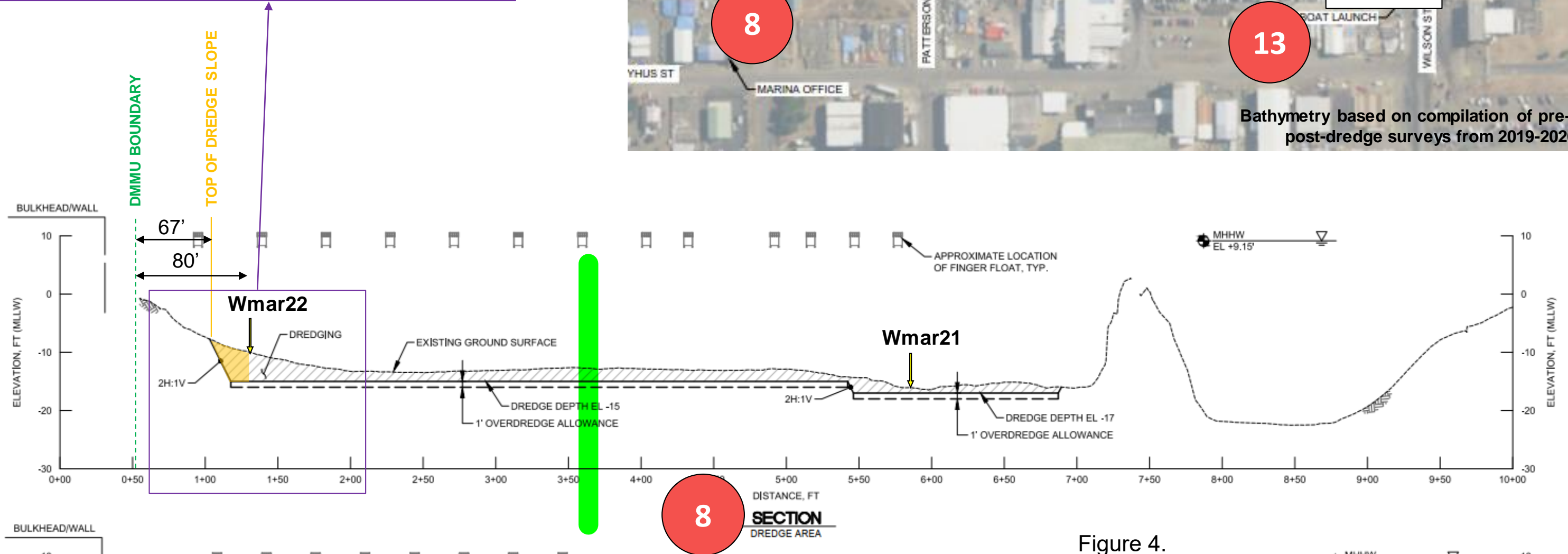
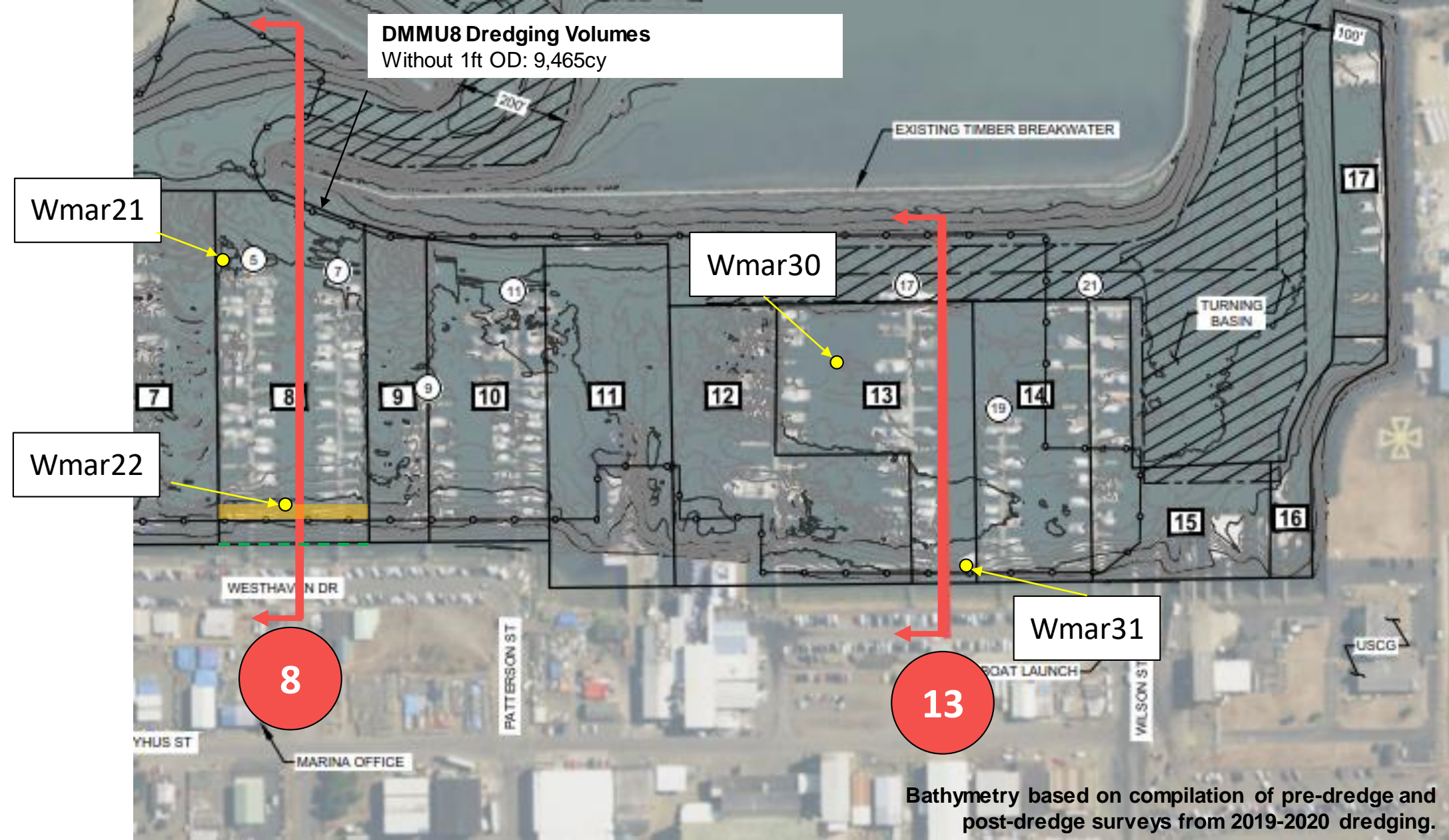
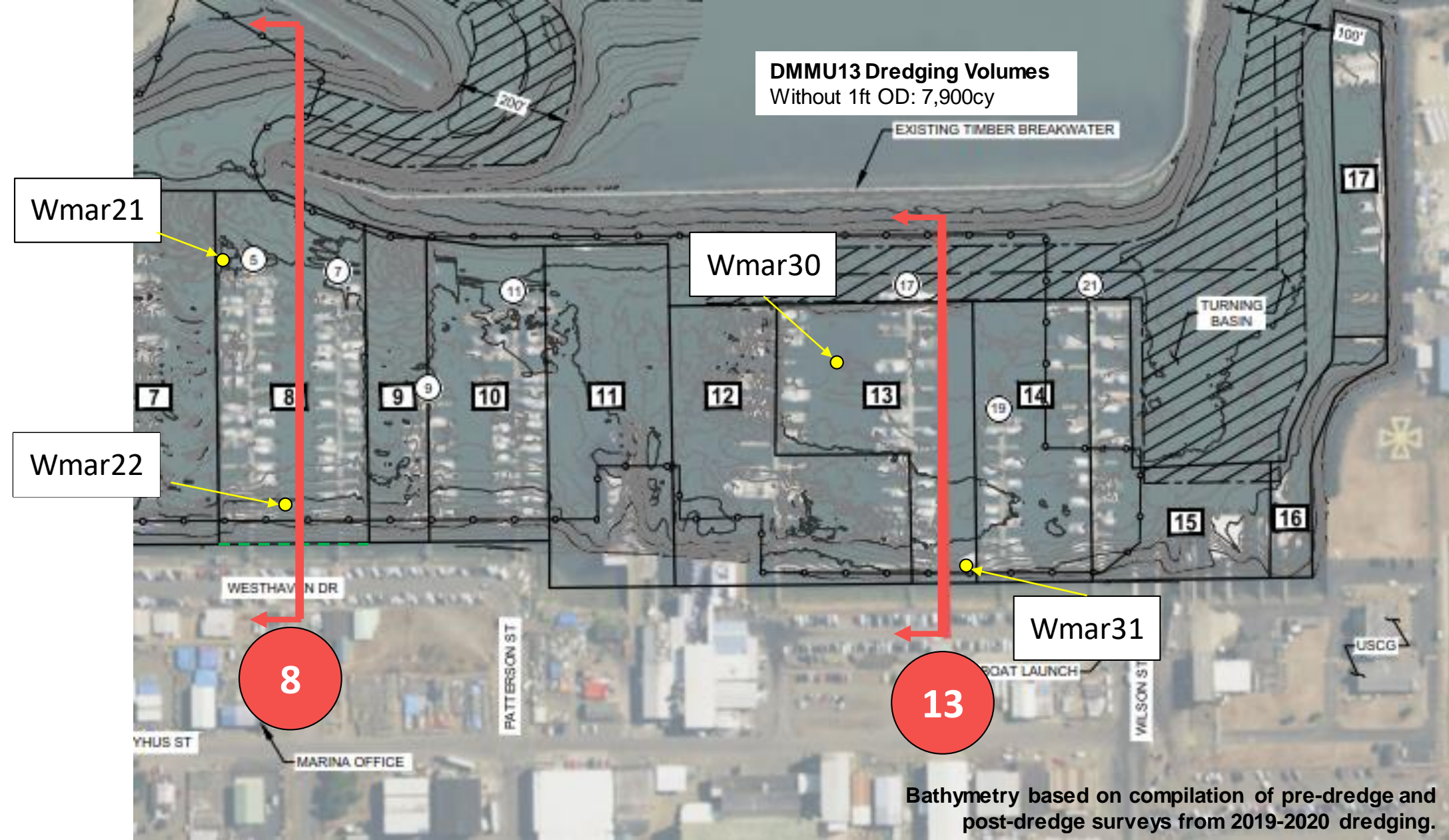


Figure 4.



No nearshore dredging in DMMU13;  
existing depths are at or below  
design depths.



Bathymetry based on compilation of pre-dredge and post-dredge surveys from 2019-2020 dredging.

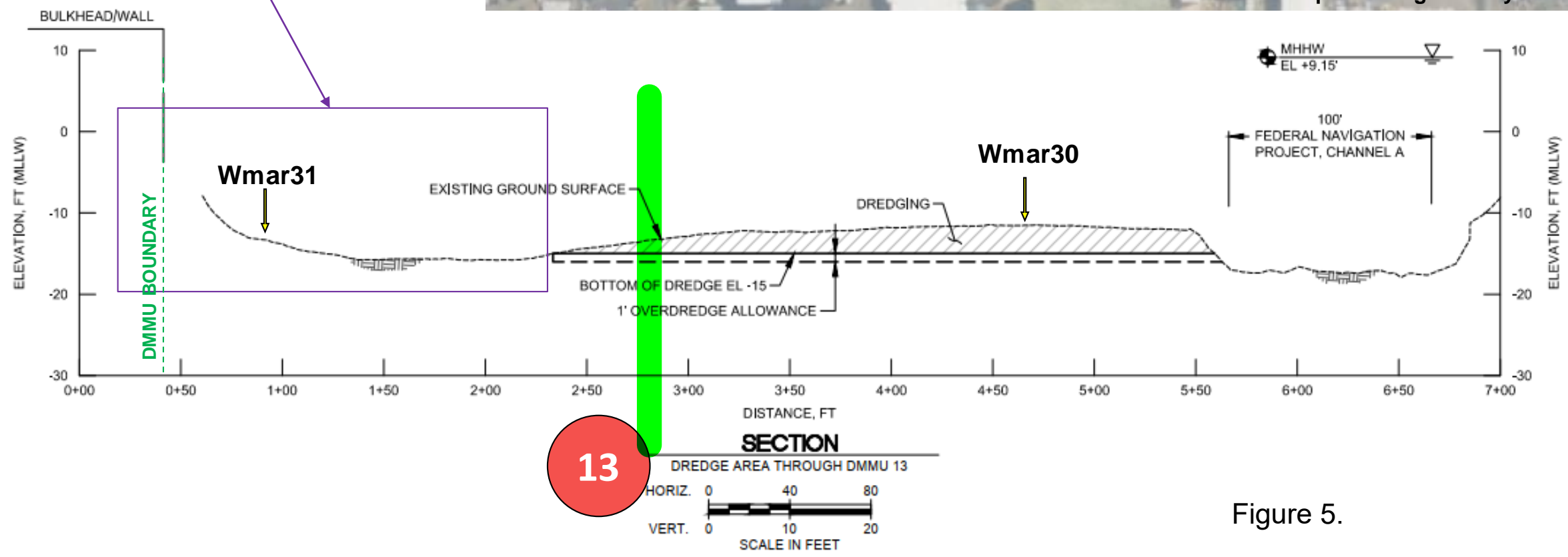


Figure 5.