Memorandum for Record **August 13, 2020**

Subject: Tier 1 Antidegradation Evaluation for the Sunlight Beach Erosion and Restoration Project on Whidbey Island in Clinton, Washington

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

The project occurs within the intertidal area of Useless Bay (Figure 1). There are six elements to this restoration project described in the Joint Aquatic Resources Permit Application (JARPA). The element that was reviewed by the DMMP includes a managed breach of Henny Spit which will involve dredging a new lagoon inlet near the southern end of Henny Spit, and filling the existing inlet to Henny Spit, which will eventually distribute sediment across the project site and raise beach elevations. The proposed breach is approximately 250 feet long and cut perpendicularly through the existing sand spit at an elevation of 2 feet NAVD88. The breach will have a trapezoidal cross section, with a bottom width of approximately 40 feet, and a top width of approximately 80 feet. These dimensions and elevations are similar to the current tidal inlet at the north end of the spit. The total amount of sediment excavated from the breach will be approximately 2,250 CY. Upon excavation at the breach, the sediment would be hauled by bulldozer or excavator along the spit to the north mouth. The existing channel will be filled to a base elevation 9 feet NAVD88, and the center of the channel fill will be overfilled to an elevation of 10 feet NAVD88, to accommodate settling and loss of sediment. A total of about 100 feet of the channel will be filled. The depth of fill is between 4 and 8 feet, with a width of approximately 70 feet. The estimated placement volume is approximate 2,250 CY.

Tier 1 Evaluation

Available data was obtained and reviewed by the Dredged Material Management Office (DMMO) in order 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. No previous assessments were conducted at this site.
2. Ecology's Environmental Information Management (EIM) Database. A search was conducted to look at chemical or biological data within 0.5 mile of the project location. One water quality sample was available, with no organic chemistry or metals results (Figure 2).
3. Ecology's "What's In My Neighborhood" Site Cleanup Database. A search was conducted to look at historical and active cleanup sites within 0.5 mile of the project location. There are no identified historical or current cleanup sites that would be a source of contamination to the project location.
4. Ecology's Spill Map. A search was conducted to look at spills within the last 2 years within 0.25 mile of the project location. No spills were reported near the project location.

Antidegradation Determination.

The project is located in a residential area with no historical or active cleanup sites nearby. Based on the Tier 1 evaluation, the potential for contamination to be present is low. The DMMP agencies have

determined that the sediment exposed by dredging will likely meet the State of Washington antidegradation standard, and therefore, no DMMP testing of the leave surface is required for this project. 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 2018. *Dredged Material Evaluation and Disposal Procedures (User Manual)*. Dredged Material Management Program, updated December 2018.

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-2019-876 provided to USACE Regulatory Department.

Figures

Figure 1: Project Location (excerpted from JARPA)

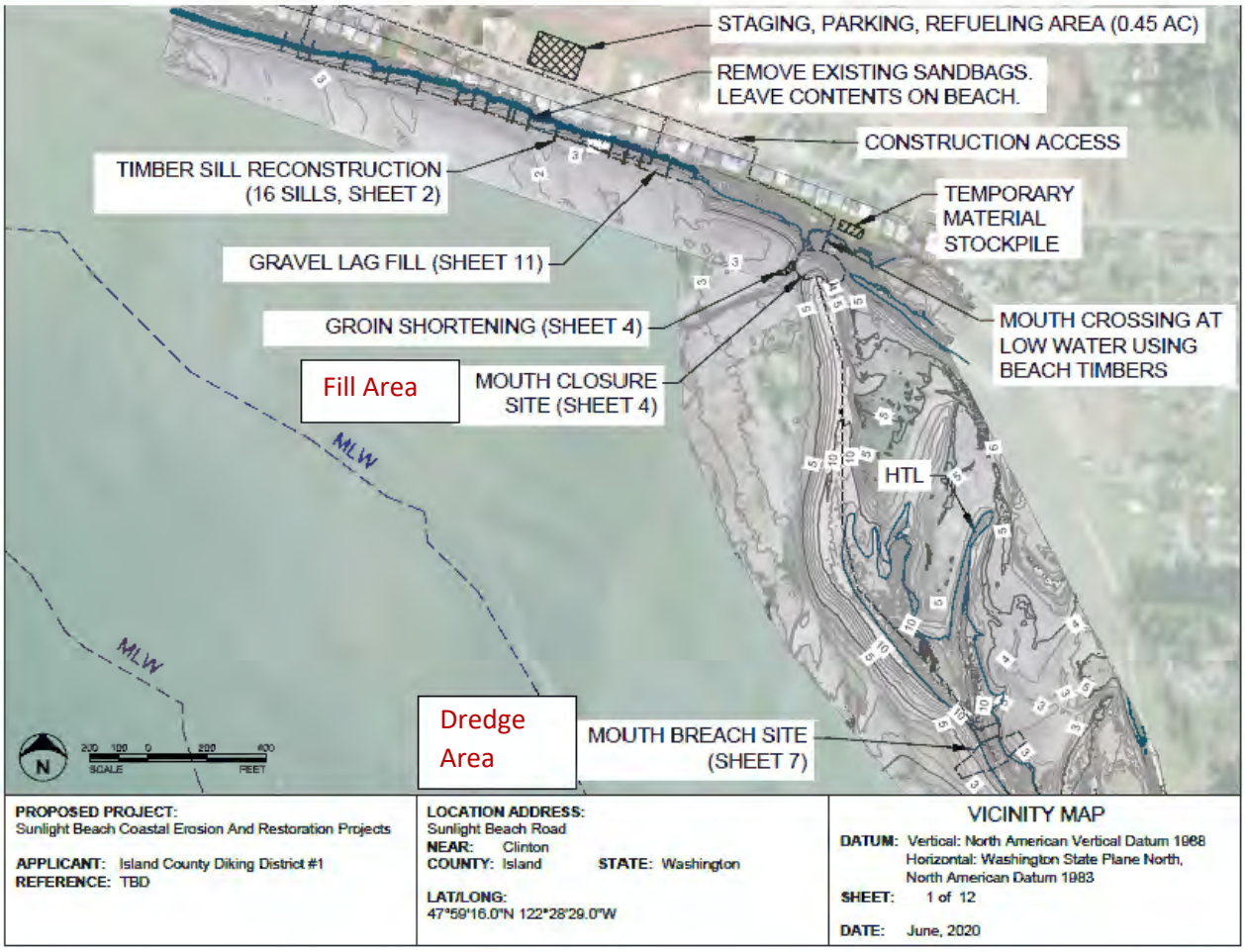
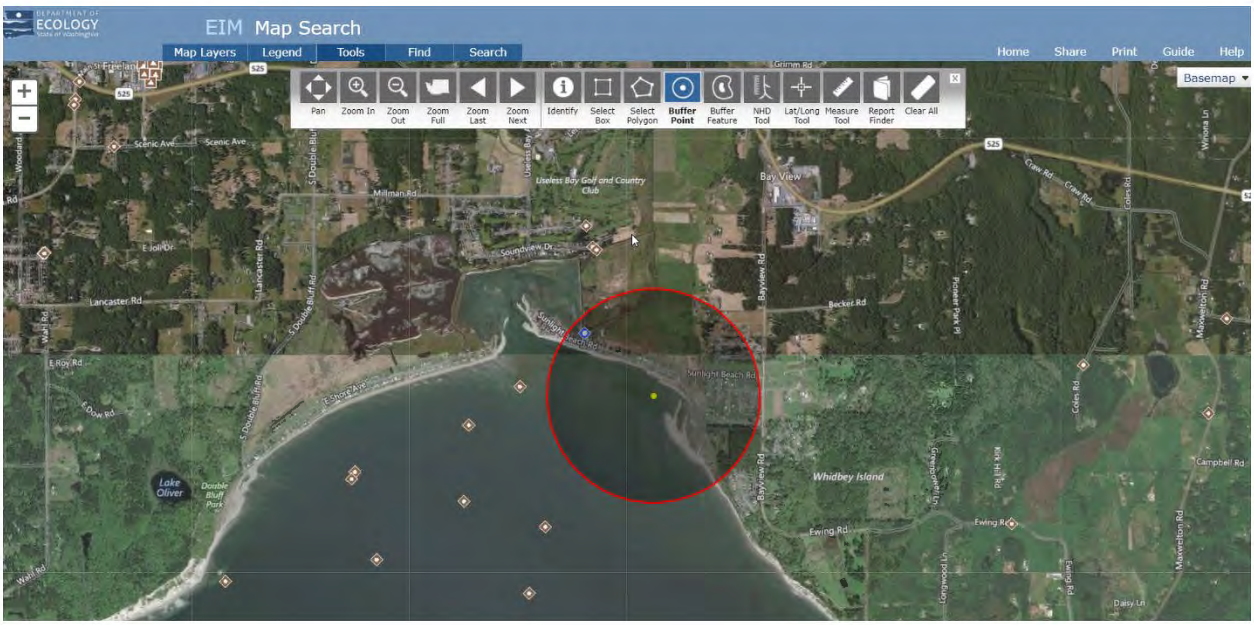


Figure 2: EIM Data Search



Agency Signatures

signed copy on file in DMMO - Seattle District office

Date	Joy Dunay – U.S. Army Corps of Engineers, Seattle District
Date	Erika Hoffman – 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
Jordan Bunch, USACE Regulatory Project Manager
DMMO File