

USACE, Dredged Material Management Office

To Whom it May Concern,

On behalf of the Corps' Navigation Section and the Dredged Material Management Office, which serves as the lead agency for Washington's inter-agency Dredged Material Management Program, I would like to submit the following comments, included in the attached document.

We submitted comments on the preliminary draft of the Marine Spatial Plan which, in a few instances, were not addressed. None of our comments were controversial so we are wondering why they weren't addressed.

Thank you for taking the time to consider our comments.

USACE Seattle District Comments from Navigation Section and Dredged Material Management Office on Ecology's Draft Marine Spatial Plan, December 12, 2017

1. Map 52 – The purple dot indicating the Westport Marina is in the wrong place and should be moved to where the blue dots on the east side of the peninsula are.
2. Page 2-236 – Permitting Dredged Material Disposal, second paragraph.

Change from:

State and federal agencies work together to evaluate and manage dredged material disposal. Disposal sites in Washington waters are designated by one of three agencies: the EPA, Corps, or DNR. The specific process for disposal permits and authorizations varies slightly depending on which agency designated the site and whether the project proponent is the Corps or a private entity. However, environmental review for water quality¹, physical effects, and species consultations are always performed, regardless of the disposal project.

To:

Ocean disposal sites in Washington waters are designated by EPA under Section 103 of the Marine Protection, Research and Sanctuaries Act (MPRSA). Dredged material disposal sites in inland waters are advance identified by the Corps and EPA under Section 404 of the Clean Water Act. Regardless of the type of site, state and federal agencies work together to evaluate and manage dredged material disposal. The specific process for disposal permits and authorizations varies slightly depending on whether the site is a Section 103 or Section 404 site. The process for obtaining a permit varies slightly depending on whether the project proponent is the Corps or a private entity, but the sediment testing and environmental review requirements are the same and are met by all dredging proponents. Environmental review for water quality², physical effects, and species consultations are always performed, regardless of the disposal project.

3. Page 2-236: Change Water Quality Act to Clean Water Act
4. Page 2-236: DNR's permit for dredged material disposal should be capitalized – Site Use Authorization (SUA)
5. Page 2-237 under Site Selection: Change second sentence to say "As described above, several agencies are involved in designating, identifying, and managing disposal sites..."

¹ In-water disposal of dredged material must adhere to federal and state water quality standards. These water quality parameters include dissolved oxygen, turbidity, and contaminants [WAC-173-201(A)].

² In-water disposal of dredged material must adhere to federal and state water quality standards. These water quality parameters include dissolved oxygen, turbidity, and contaminants [WAC-173-201(A)].