Received
Electronically
February 8, 2016

DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 3755
SEATTLE, WASHINGTON 98124-3755

REPLY TO
ATTENTION OF

Environmental and Cultural Resources Branch

FEB 05 2016

Ms. Loreé Randall
SEA Program
Washington State Department of Ecology
P.O. Box 47600
Lacey, Washington 98504-7600

Dear Ms. Randall:

The U.S. Army Corps of Engineers, Seattle District (Corps) will perform repair of the Breakwater located at Westhaven Marina at Westport, Grays Harbor County, Washington. The project consists of replacing wood planks in areas of missing or damaged planking on the channel side of the timber training wall and replacing stone to restore the toe berm to original grade. The Corps will place new planks from elevation +4.0 to +11.0 feet mean lower low water from Station 0+00 to 16+00 the marina side. To provide additional filtration of suspended sediments, the Corps will install a geotextile fabric between the piles and new planks from Station 8+00 to 14+00. All stone will be placed within the footprint of the original design specifications. The Corps will execute construction in the dry in conjunction with low tides.

The proposed action has been analyzed for consistency with the City of Westport Shoreline Master Program and has been determined to not cause substantial adverse effects to shore resources or the environment. Pursuant to the Shoreline Management Act of 1972 (RCW 90.58), the Corps has determined this proposal is consistent to the maximum extent practicable with the State of Washington Shoreline Management Program.

According to 33 CFR 230.9(b), this action does not have significant effects on the quality of the human environment when considered individually and cumulatively and is categorically excluded from documentation under the National Environmental Policy Act.

If you have any questions, please call the project Environmental Coordinator, Ms. Nancy Gleason at 206-764-6577.

Sincerely,

Evan R. Lewis
Chief, Environmental and Cultural
Resources Branch

COASTAL ZONE MANAGEMENT ACT
CONSISTENCY DETERMINATION

Submitted by the U.S. Army Corps of Engineers,
Seattle District

US Army Corps
of Engineers®
Seattle District

Westhaven Cove Breakwater Repair Project
Grays Harbor County, WA

February 2015

1. INTRODUCTION AND PROJECT DESCRIPTION

The Coastal Zone Management Act of 1972, as amended, requires Federal agencies to carry out their activities in a manner which is consistent to the maximum extent practicable with the enforceable policies of the approved state Coastal Zone Management (CZM) Programs. The Shoreline Management Act of 1972 (SMA; RCW 90.58) is the core of Washington's CZM Program. Primary responsibility for the implementation of the SMA is assigned to the local government.

According to 15 CFR Ch. IX § 930.30, the Federal Government is directed to ensure "that all Federal agency activities including development projects affecting any coastal use or resource will be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of approved management programs." The Westhaven Cove Marina (also called Westport Cove Marina and Westhaven Marina) breakwater repairs occur within the coastal zone governed by multiple municipalities including Grays Harbor County and the cities of Westport.

The breakwater repairs are activities undertaken by a Federal agency; the following constitutes a Federal consistency determination with the enforceable provisions of the Washington Coastal Zone Management Program.

Authority

The Westhaven Cove Small Boat Basin with two entrance channels was authorized on 30 June 1948 (80th Congress, 2nd Session) and modified in 1979 by provisions of Section 107 of the 1960 Rivers and Harbors Act (86th Congress, 2nd Session). The 1948 Act provided for three breakwaters and maintenance of two entrance channels, an access channel, and a turning basin in Westhaven Cove with water depth of -16 feet (ft) below mean lower low water (MLLW) with an allowance for one foot of advance maintenance and one foot of overdepth dredging.

Action Area

The project area is located in the Westhaven Cove Marina, in Westport, WA (Figure 1). The damage is located on Breakwaters A, B, and C of the Westhaven Cove Marina (Figure 2), which separates the marina from Grays Harbor. The action area includes the Westhaven Cove Marina.

Background

The Grays Harbor navigation project is located at the mouth of the Chehalis River on the Washington coast, about 45 miles north of the Columbia River and 110 miles south of the entrance to the Strait of Juan de Fuca. The communities of Westport, Aberdeen, Hoquiam, and Cosmopolis (all combined are served by the Port of Grays Harbor) are all located near the mouth of the Chehalis River at the eastern end of Grays Harbor. The harbor is 15 miles long and 11 miles wide and enclosed by two long spits, Point Brown to the north and Point Chehalis to the south.

An additional navigation feature at Grays Harbor is the Westhaven Cove Marina, which is operated by the Port of Grays Harbor. The marina is located on the eastern side of Pt. Chehalis near the mouth of Grays Harbor and provides 60 acres of protected moorage for a fishing fleet

and the US Coast Guard Westport Station. The Westhaven Marina at Point Chehalis is protected with a Federal groin and revetment system including six groins and approximately 7,000 feet of exposed and buried revetment. A series of breakwaters (Breakwaters A, B, AB, and C) help protect the marina.

Breakwaters A and B are creosote treated timber contact pile breakwaters originally constructed in 1950. The gap between the breakwater A and B historically served as the entrance to the marina. The breakwaters were built using 1-ft-diameter creosote-treated wooden contact piles. Various improvements including bolting planking to the piles and adding toe stone reinforcement were performed in 1952-1963.

In 1958, the entrance between breakwater A and B became infeasible to maintain due to shoaling and wave transmission into the marina and local interests closed the gap by sinking two barges filled with dredge material and installing a rock toe along the barges. By 1973, the solution was not performing as intended so a contact pile structure similar to the adjacent breakwaters was constructed, thus permanently provided closure between breakwaters A and B. Planking on Breakwater A and B and the AB closure last occurred in 2007.

Breakwater C was originally constructed in 1957. In 1959, planking to the contact pile breakwater was installed. In 1964, a 200-foot dog leg was constructed on the northern end of the breakwater to reduce wave transmission into the marina between breakwaters B and C. The breakwater layout was reconfigured to the current orientation in 1979 to allow for expansion of the boat basin. The last repairs to breakwater C occurred in 1985. This work consisted of removing and reinstalling planking and minimal toe stone work.

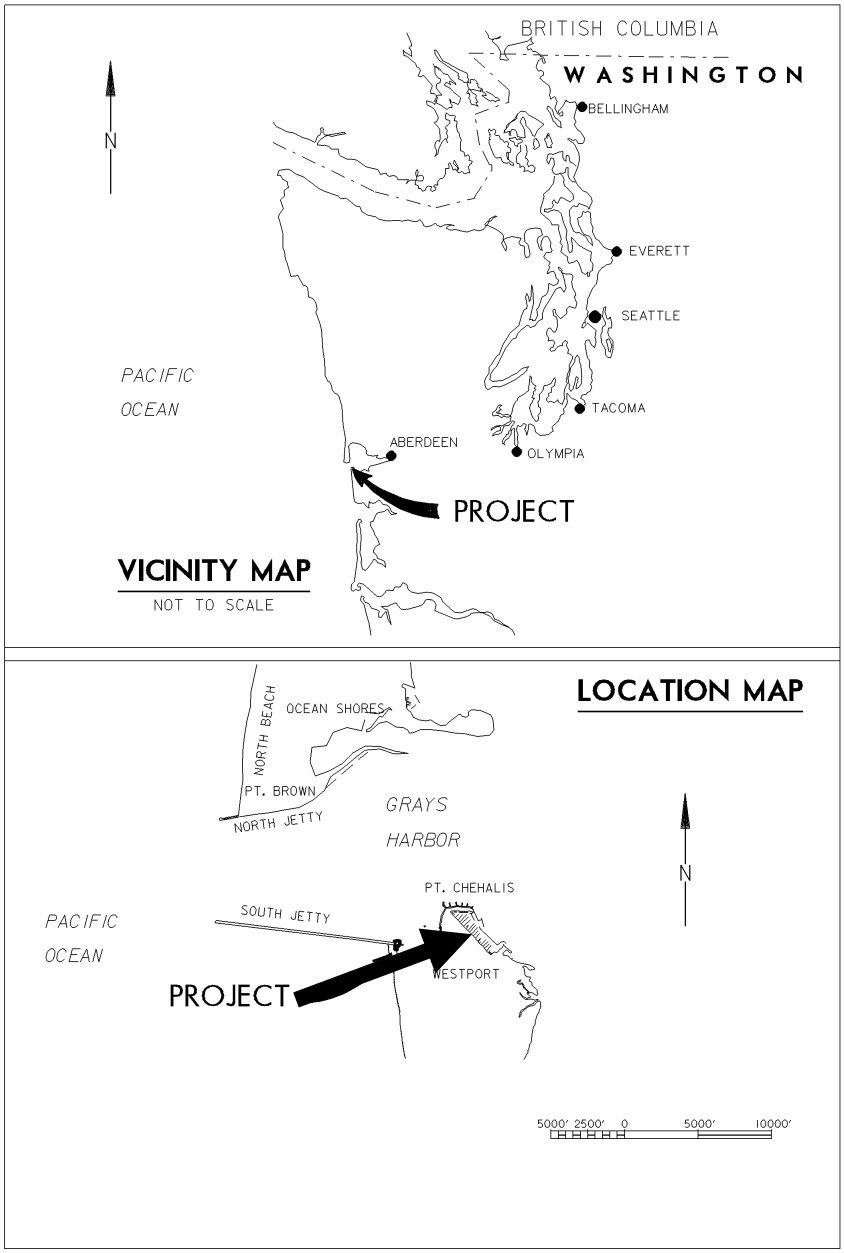

Figure 1. Location and vicinity map.

Figure 2. Westhaven Cove breakwaters and boat basin.

2. PURPOSE

The purpose of the project is to provide the level of marina protection as intended by the originally designed and constructed breakwaters. When fully functional, the breakwaters do not allow tidal or wave flows into the marina and prevent increased sedimentation and wave transmission, which can damage floats in the marina. The Port of Grays Harbor has indicated that large storm events are capable oscillating floats 1-2 ft and has resulted in damages to floats on the fuel dock leeward of Breakwater A. Several areas of the breakwaters also have rotted, missing, or damaged planking or displaced toe rock that allows large sediment fans and turbulent tidal and wave generated flows through to the marina side.

3. PROPOSED ACTIONS

3.1 Planking

New planks, which will be treated with the currently accepted, less environmentally harmful wood preservative of approved marine grade, will be placed in areas of missing or damaged planking on the channel side of the timber training wall. Planking will be placed at low tide (-2 MLLW maximum) since most of the damaged planks are below +8 MLLW. During removal of damaged planks some bolts may need to be removed using an acetylene torch or chainsaw. Planking will be cut such that cuttings are contained and disposed of to provide for the least amount of environmental disturbance as the project will allow. Historically, 6 foot long planking (3”x12”) was bolted to 4 feet on center using ¾-inch diameter bolts and nuts with 7/16-inch by 4-inch square plate washers. Thus, a set of 2 bolts, 2 nuts, and 4 square washers is required for each plank during installation.

3.2 Toe berm stone

A quantity for toe berm stone was approximated and quantities are calculated through the use of handheld GPS measurements and photographs obtained in the field. Approximately 5,000 tons of stone is required for the proposed repairs. All stone will be placed within the footprint of the original design specifications. The contour will be marked prior to placement. Stone will be brought in by barge and likely placed using a hydraulic excavator operating from the barge. Stone will be of a similar size (one- to two-ton stones) and composition as called for in the design and will conform to the top elevation of the neighboring segments of armor stone. Stone will primarily be placed on the existing toe berm stones and placement of stone elsewhere will be minimized.

3.3 Geotextile fabric

In order to provide additional filtration of suspended sediments, a geotextile fabric is recommended to be installed between the piles and new planks from Station (Sta.) 8+00 to 14+00 of Breakwater C. A polypropylene fabric will be installed between the piling and planks so that it is sheltered from direct ultraviolet exposure. The fabric will be permeable to water, but impermeable to sand and other fine material.

3.4 Breakwater Repair Options

There is a combination of repair options to one or multiple breakwaters, in order to restore the structural integrity and protection from wave action and sedimentation that the breakwaters provide (Figures 3 and 4). Toe berm work will be during periods of low tide so that no in-water work will take place, but work will occur during designated in-water work windows.

The toe berm on the southern 300-ft reach of breakwater A (e.g. Sta. 6+70 to 9+70) was originally constructed to +4.0 ft MLLW. Unlike the northern reach, Sta. 0+00 to 6+70 where armor stone extended to the bottom of the wale (elevation +15.5 ft MLLW) the planking the breakwater has been exposed to turbulent tidal and wave generated flows. The majority of missing planking on Breakwater A above the toe stone is located on the bottom 3 rows, e.g. elevation +4 to +7 ft MLLW. Numerous planking is rotted and existing planks are not through bolted to the piling, thus additional damage is expected over time. Thus, a full replacement of the bottom seven rows using through bolts is recommended. In order to reduce wave transmission into the marina, the harbor side toe berm needs to be repaired with approximately 1,000 tons of stone. Restoring the toe berm to its full width will help dissipate wave energy prior to reaching the timber pile structure and should minimize wave transmission into the marina.

Planking was never installed on the harbor side of breakwater B between +4 and +8 feet MLLW. The marina side toe berm was originally constructed up to +8.5 feet MLLW to minimize tidal flow through the structure. However, the toe berm rock has displaced over time leaving large voids in between the piling where planking was never installed. In order to decrease this void space approximately 1,000 tons of additional toe stone is recommended to be placed to restore the berm from Sta. 1+50 to 7+00.

Repairs were last made on Breakwater C in 1985. Large sections of planking on the bottom seven rows (+4.0 to +11.0 ft MLLW) of the breakwater (on the marina side) are damaged or displaced. In the last few years, this has resulted in large sediment fans protruding into the

marina adjacent to the Federal navigation access channel. Toe berm stone of Breakwater C has settled and requires two to three additional feet of stone to match the original toe berm grade, which will require approximately 3,600 tons of stone. In order to provide additional filtration of suspended sediments, a geotextile fabric is recommended to be installed between the piles and new planks from Sta. 8+00 to 14+00.

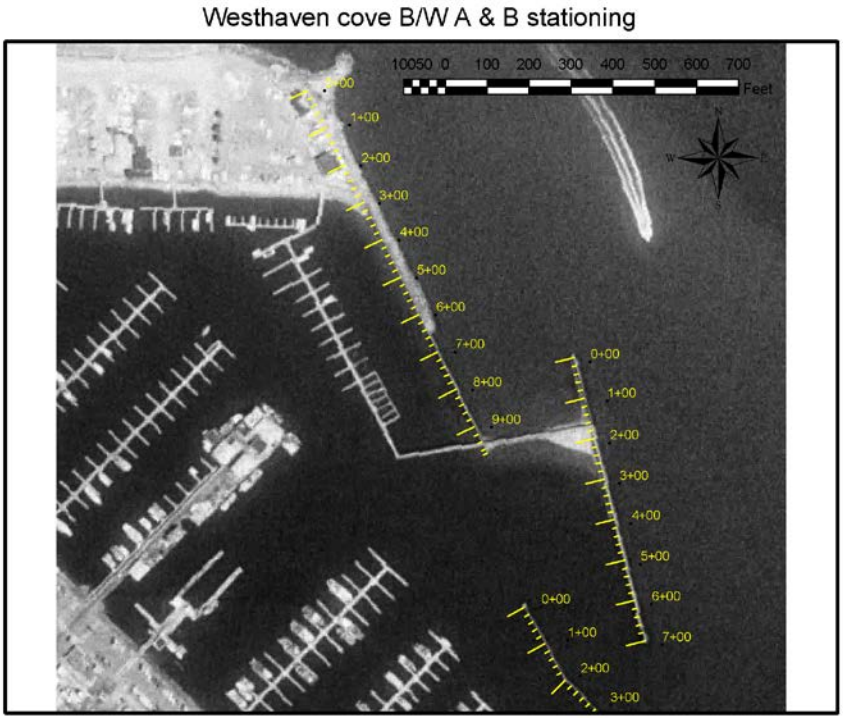

Figure 3. Westhaven Cove Breakwaters A and B stationing.

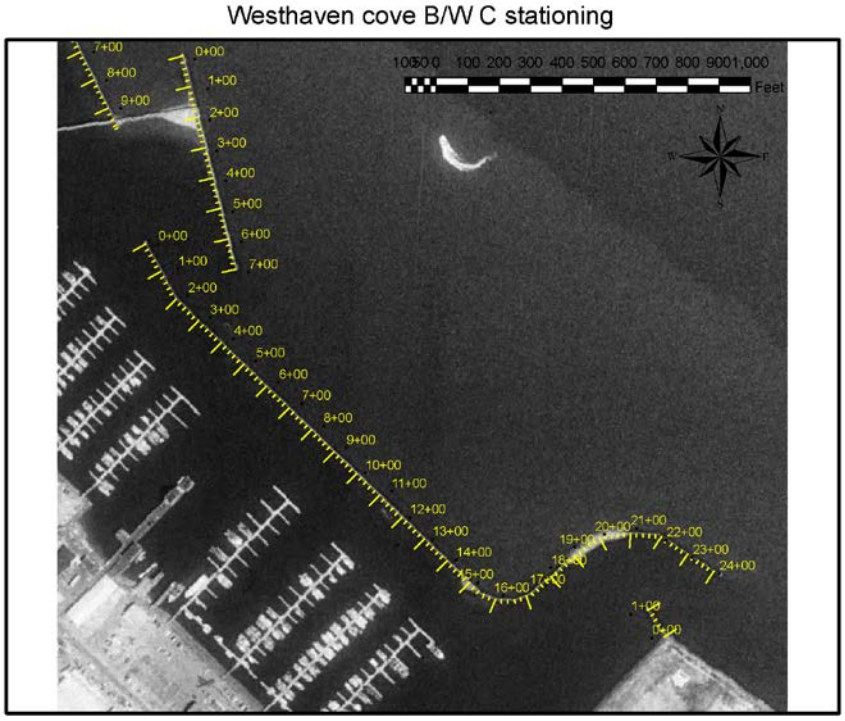

Figure 4. Westhaven Cove Breakwater C stationing.

4. JURISDICTION AND CONSISTENCY REQUIREMENTS

Washington's CZM Program defines the State's coastal zone to include the 15 counties with marine shorelines, which includes Grays Harbor County. Primary responsibility for the implementation of the SMA is assigned to local government. The City of Westport, in which the proposed breakwater repairs are located, fulfilled this requirement with the Shoreline Master Program (SMP) for the City of Westport. The City of Westport has elected to implement the State Shoreline Management Act, Chapter 90.58 RCW through the adoption of goals and policies in Chapter 9 of the City of Westport's Comprehensive Plan, and Chapter 17.32 of the development regulations in the City of Westport's Municipal Code.

The proposed breakwater repair location is the Westhaven Cove Marina, located in Grays Harbor and designated in the City of Westport's Shoreline Management Program as Marine Industrial.

4.1 Consistency Requirements

The Corps is seeking state concurrence with the Coastal Zone Management Act (CZMA) Consistency Determination for the proposed Westhaven Cove Breakwater Repair from the Washington Department of Ecology (Ecology) per CZMA Section 307 (c) and 15 CFR 923.33 (a) & (b). Under Washington's program, Federal projects that would affect land use, water use or natural resources strive to demonstrate consistency with the policies of these six laws. Each of these laws is addressed below.

4.1.1. **State Environmental Policy Act (SEPA)**

The proposed action is a Federal action subject to NEPA, but not SEPA as there is no state action to be taken for this project.

4.1.2. **Clean Water Act**

Pursuant to Section 404 of the Clean Water Act (33 USC 1344) and Federal Regulations (33 CFR 323.4(a)(2)), certain discharges for the maintenance, including emergency reconstruction of recently damaged parts, of currently serviceable structures such as dikes, dams, levees, groins, riprap, breakwaters, causeways, bridge abutments or approaches, and transportation structures, have been exempted from requiring a Section 404 permit. Maintenance does not include any modification that changes the character, scope, or size of the original fill design. The Corps concludes that the Westhaven Cove Marina breakwater repairs within coastal areas of Washington is exempt from Section 404 and is therefore not subject to Section 401 of the Clean Water Act.

The repair effort is not expected to cause significant adverse environmental impacts to water quality. Baseline water quality conditions will not be degraded as a result of the proposed project. All work will be done in the dry during low tide to completely avoid in-water work. Missing or deteriorating planking will be installed at very high elevations above the water (+8.0 to +14 MLLW) and will, therefore, have only minimal (immeasurable) environmental impacts, primarily consisting of the loss of wood fragments into the aquatic environment. No in-water work will be conducted. All planking will be inspected to ensure it is clean and dry and that there are no excessive residual materials or preservative deposits. The planking will be replaced to original design specifications, but no creosote or creosote-based materials will be used. Construction for planking replacement will take place from a barge, which may require

anchoring or grounding close to the breakwater during toe berm repairs. Due to the heavily trafficked marina environment, proximity to the breakwater structure, and temporary nature, the presence of the barge and any anchoring or grounding is expected to have minimal impacts.

One- to two-ton toe rock will only be placed within the original footprint of the breakwater structure and will keep to original design specifications. During low tide, most toe rock placement will occur on existing toe rock and placement elsewhere (e.g., on sand) will be minimized to limit turbidity. Construction for toe rock placement will likely take place from a barge so that an excavator may be used to place the toe rock, which may require anchoring or grounding close to the breakwater. Due to the heavily trafficked marina environment and proximity to the breakwater structure, anchoring or grounding is expected to have minimal impacts. Toe rock placement is expected to take up to approximately two weeks.

The geotextile fabric will likely be made of a polypropylene material and will be installed so that it contacts no direct UV light. The fabric is not expected to degrade or breakdown and will remain as a sediment barrier within the breakwater.

Best management practices (BMPs) will be used to ensure that no unnecessary damages to the environment occur. BMPs include the following:

- Equipment that will be used near the water will be cleaned prior to construction,
- Refueling shall be monitored by the contractor for the duration of the project,
- Fuel hoses, oil drums, oil or transfer valves and fittings, etc. shall be checked regularly for drips and leaks, and shall be maintained and stored properly to prevent spills into tribal or state waters,
- A spill kit will be onboard the vessel at all times,
- Planking will be cut such that cuttings are contained and disposed of to prevent release into the aquatic environment.
- Movement and placement of rock will occur at low tide to avoid in-water work.

4.1.3. **Clean Air Act**

The proposed project has been analyzed for conformity applicability pursuant to regulations implementing Section 176(c) of the Clean Air Act. The project constitutes a routine facility repair activity generating an increase in emissions that is clearly *de minimis* under 40 CFR 93.153(c)(2)(iv). For this reason, a conformity determination is not required for this project.

4.1.4. **Ocean Resources Management Act**

The proposed action includes sites in Grays Harbor on the Pacific Ocean. The enforceable policies of Chapter 43.143 RCW apply to coastal waters of the Pacific Ocean. The proposed action is a breakwater repair for the protection of the Westhaven Cove Marina. There will be no significant long-term impacts to coastal or marine resources or uses, particularly in Grays Harbor where special protection is provided. Therefore, the proposed action is in compliance with this Act.

4.1.5. **Energy Facility Site Evaluation Council**

The proposed project does not involve siting of energy facilities in the State of Washington and does not apply to the proposed action.

4.1.6. **Shoreline Management Act**

The previous City of Westport SMP was within the original City of Westport Comprehensive Plan, adopted in 1998 and revised in 1999. The current approved City of Westport SMP as it currently exists or is hereinafter amended, updated, or replaced by ordinance of the City Council of the City of Westport, is adopted by reference and included as Appendix C of the City of Westport Comprehensive Plan.

Applicable policies and regulations of the City of Westport SMP are presented in Section 5 with details on how the proposed breakwater repairs are consistent with each.

5. CONSISTENCY DETERMINATION

5.1 City of Westport Shoreline Master Program

Chapter 2. Shoreline Management Policies

B. Activity and Development Policies

16. Marinas: Marinas are facilities which provide boat launching, storage, supplies, and services for small pleasure craft and commercial fishers.

    a. Marinas should be designed in a manner that will minimize damage to fish and shellfish resources and be aesthetically compatible with adjacent areas.
    b. Adequate parking should be provided and should be located as far upland as possible.
    c. The existing marina and support activities within Westport should be maintained and encouraged.

    Consistent. The proposed repairs are maintenance to the Westhaven Cove Marina breakwater system, which is an existing marina support activity.

17. Shoreline Works and Structures: This term is used to cover: bulkheads, breakwaters, riprap, jetties, groins, shoreline protection works, piers, levees, docks, channelization works, berms, and the like. In Westport the most significant shoreline works and structures include the south jetty, the groins and rip-rap protecting Westhaven, and the works protecting the marina. The measures are necessary to protect both Westhaven and the harbor entrance channel. Note: SWS means "Shorelines Works and Structures."

    a. Maintenance and protection of the essential SWS should be encouraged and fostered.
    b. The highly altered banklines in the north and northeasterly portion of Westport should be maintained and are considered acceptable alterations.
    c. In-water structures are appropriate in existing developed areas and in direct support of transportation terminals, recreation, the fisheries industry, or other water-dependent businesses.
    d. Navigation structures and erosion control devices such as jetties and groins are acceptable uses in the Westport area.
    e. Where practical, open piling is preferred for piers and docks.
    f. SWS should minimize and/or compensate adverse effects on beach sand movement and further minimize alteration of the natural shoreline.

g. Where both might be applicable, floating structures are preferred to non-floating types in order to not interfere with water life, currents, sand movement, and circulation.

Consistent. The breakwaters are essential Shoreline Works and Structures that provide protection and direct support to the Westhaven Cove Marina, a transportation terminal. The breakwaters provide erosion control and minimize the alteration of the natural shoreline. It is not possible for the breakwaters to be constructed as floating structures and still provide the same protection and support.

C. Natural System Policies

2. Estuary

a. The existing water area of the estuary will remain substantially in its present configuration. Minor alterations for maintenance of the existing bankline, protective structures, and the marina access channel will be permitted.
b. The existing levels of water quality will be maintained to ensure the continued production of fish, wildlife, and oysters within the estuarine waters adjacent to the Westport area. Any new developments or discharges will be evaluated to determine any detrimental effects they might have on existing water quality.
c. The natural bankline in the Half Moon Bay State Park area and in the southern portion of the Westport area shall be managed as a finite resource maintaining a natural configuration to as great an extent as possible.
d. In areas subject to tidal flooding, development should be discouraged in presently undisturbed areas and encouraged where urban development has occurred or where landfilling and spoiling have altered the environment. The preferred practice is to elevate the sites above the ordinary high water line and/or use dikes and tidegates to protect development from tidal flood damage.

Consistent. The breakwaters have been previously constructed and only require repair to original specifications. No alteration of the existing water area of the estuary will occur as the breakwater repairs are limited to the original design footprint and specifications. No degradation of existing water quality will occur due to the repair methods and by the use of appropriate Best Management Practices described in section 4.1.2. No construction will take place along the natural bankline and no development will take place in areas subject to tidal flooding.

D. Shoreline Environment Policies

3. Conservancy Environment

a. The purpose of the Conservancy Environment is to protect environmentally sensitive areas.
b. Land uses within the Conservancy Environment should be limited to those which do not adversely impact the renewable resource management system, and permitted activities should take into consideration the ecological factors which must be protected in order to continue utilizing the resource in the future.

Consistent. The breakwater repairs will not adversely impact the renewable resource

management system. Consideration has been given for the protection of the ecological factors such as water quality, fish, marine mammals, birds, and other wildlife, and existing state of the Westhaven Cove Marina.

6. STATEMENT OF CONSISTENCY

Based on the above evaluation, the Corps has determined that the proposed breakwater repair activities are consistent with the applicable policies and regulations specified in the City of Westport Shoreline Master Program. The proposed action is thus considered to be consistent to the maximum extent practicable with the enforceable policies of the State of Washington Shoreline Management Program and policies and standards of the City of Westport Shoreline Master Program.