

**ISSUE PAPER****PSDDA REQUIREMENTS FOR PROGRAM REVIEW REPORTS AND MEETINGS**

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**INTRODUCTION**

The agencies implementing the PSDDA Management Plans are required to annually prepare seven program documents:

- DNR prepares an annual site-use report which describes the use of PSDDA disposal sites during the previous dredging year.
- The Corps prepares a report now called the Dredged Material Evaluation Application Report (DMEAR). This report contains all the relevant data collected within the previous Dredging Year pertaining to dredged material sampling, testing and disposal guidelines application.
- The Corps prepares a report on the results of any physical monitoring of disposal sites.
- DNR prepares a report on chemical and biological monitoring of disposal sites.
- Ecology prepares a report which summarizes all environmental monitoring of disposal sites.
- Ecology prepares the Management Plan Assessment Report (MPAR) which assesses the need for changes in dredged material evaluation procedures and disposal site management plans. It includes an analysis of the need for technical changes to sampling guidelines, chemical and biological testing methodologies and disposal guidelines.
- The Corps prepares an Annual Review Meeting (ARM) notice announcing the meeting details and transmitting the issue and clarification papers.

**PROBLEM IDENTIFICATION**

Public involvement in the PSDDA annual review process requires active participation to track and integrate information contained in the numerous program reports. While the reporting responsibilities were initially designed to ensure active and equitable involvement from each of the regulating agencies, the net result has been a presentation to the public that is more fractured than necessary. Improvements in the presentation of annual review materials are needed to enhance public participation in the annual review process.

Though PSDDA agency staff expend substantial effort to ensure that the various reports are consistent and represent an integrated assessment, the current program review structure still results in duplication of information, effort and mailing costs. This additional effort could be applied to day-to-day management of dredging projects, including review of applications; evaluation of dredged material testing requirements and results; data management; and inspections to ensure permit compliance. Project-specific review will become even more critical to the success of the PSDDA program as the number and complexity of projects increases. Indeed, the experience of DY 1990 (relative to Dredging Year 1989) was that greater effort was required to develop and review sampling and analysis plans (SAPs), conduct quality assurance/quality control reviews on the resulting data, and analyze that data for

suitability decisions.

In addition to these responsibilities, PSDDA program requirements to address ongoing issues (e.g., development of improved tests) and to prepare annual reports are now combined with the need to assess and respond to the results of disposal site environmental monitoring. And new significant program changes are becoming less frequent as experience with program implementation is gained.

To ensure effective opportunity for public involvement, the PSDDA agencies are evaluating program changes in the annual reporting schedule contained in the PSDDA Management Plans. Reduced reporting for some aspects of the program would allow better dedication of resources to program services.

## **BACKGROUND**

During its first few years, a new program requires more oversight to implement, to allow public scrutiny, to fine-tune protocols and to make necessary program adjustments. As the program gains experience, less oversight is generally required. The PSDDA program is an excellent example of this. By the next Annual Review Meeting (spring 1992), the PSDDA agencies expect to have the experience and data to show that the program has completed the initial "fine-tuning" stage, continues to work well, and provides appropriate protection of the environment.

The need for major changes is not expected to occur on an annual basis after DY 1991 (spring 1992 ARM). Therefore, the PSDDA agencies propose altering the reporting and annual review requirements. In particular, considerable duplication of effort could be avoided by report consolidation. The DNR site use report could be consolidated with the Corps' DMEAR. The three monitoring reports could also be consolidated into one. This would be advantageous because monitoring evaluation requires close coordination among the agencies to ensure that physical, chemical and biological information is integrated before conclusions are reached.

This approach would also reduce the number of reports which the interested public would need to read. Reducing reporting requirements would also reduce the costs of preparing, printing and mailing the various reports.

## **PROPOSED MODIFICATION**

Specific recommendations of the PSDDA agencies are listed below.

1. All of the various annual reports described above will be prepared for DY 1991, to be published in spring 1992.
2. Beginning with DY 1991, DNR's Site-Use Report will be consolidated with the Corps' DMEAR Report to be published in spring 1992. The Corps will have the lead to prepare the consolidated report. In addition, Ecology will supply the Corps with a summary of dredging projects that did not use the PSDDA disposal sites for inclusion in the Corps report (rather than the Management Plan Assessment Report).
3. Beginning with DY 1990, the MPAR is consolidated with the issue papers, clarifications and the 30-day Annual Review Meeting notice so that only one package is mailed to the public. This practice will be continued in future reports.

4. After DY 1991, the Corps' dredging year report (including the Corps DMEAR, DNR's Site Use information, and Ecology's summary of other dredging projects) and Ecology's Management Plan Assessment Report (including the Corps ARM notice and issue/clarification papers) will only be prepared on a biennial basis, covering a two year period. The first set of these biennial reports would cover DY 1992-1993 and would be published in spring 1994.

5. All three monitoring reports will be consolidated into one and be prepared by spring of the year following site monitoring event(s). The DNR will take the lead to prepare the report, with the Corps providing input for physical monitoring and Ecology providing the summary and assessment of the overall monitoring for inclusion in the consolidated report. The consolidated monitoring report will not be tied to the timing of the other PSDDA reports, but would be tied to actual site monitoring events.

6. Public Annual Review Meetings will be routinely held following preparation of the various consolidated reports (springs of 1992, 1994, 1996, etc., and post-monitoring as appropriate).

During the springs of the odd numbered years, public coordination will take place as appropriate to the nature and number of clarifications or issues proposed . If there are only a few clarifications/issues and no proposals for "management plan changes", then coordination with the agencies, tribes and other interested parties will be by public notice with a comment period of 30 days. The PSDDA agencies will consider all comments received prior to implementing the clarifications (according to the procedures implemented as a result of the Second Annual Review Meeting). If major plan changes are proposed, then an Annual Review Meeting will be held.