



The Unit Owners Association at the Guilford Yacht Club
379 Whitfield Street
Guilford, Connecticut 06437

19 February 2016

State Senator Edward Kennedy
Legislative Office Building – Room 3200
Hartford, Connecticut 06106

Re: Raised Bill No. 78 – An Act Concerning the Disposition of Dredged Materials from Certain Harbors and Ports on Long Island Sound

Dear Senator Kennedy,

On behalf of the Unit Owners Association at the Guilford Yacht Club (UOAGYC), I am standing in strong opposition to the Raised Bill No. 78 – issued by the Environment Committee. We urge you to strike line 23 – “that disfavors the open water placement of dredged materials.” The Unit Owners Association at the Guilford Yacht Club is a privately owned yacht club facility located at 379 New Whitfield Street, Guilford, CT 06437. The UOAGYC serves as a recreational facility for our members and their guests including a marina basin with 153 boat slips, tennis courts, swimming pool, as well as a clubhouse that is used for both club and private events. In addition to our members, boaters from throughout Long Island Sound and neighboring states routinely visit our facility when transiting the area.

Our organization is not simply self-serving, we are active participants in the Guilford Community, offering a public swimming program and junior sailing program open town residents. This open enrollment program provides sailing lessons to children from the Town of Guilford, with more than 65% who are not UOAGYC members. In addition, the Guilford Yacht Club hosts several charity events each year- including the “Men Who Cook” event for the Women and Family Life Center.

Your bill attempts to undo over 10 years of work to assess and develop effective, environmentally sound methods to manage dredge materials in offshore disposal sites. As you are aware the Army Corp of Engineers is currently actively working on the review of the Draft Dredged Material Management Plan (DMMP) which includes support for offshore disposal. The plan has the support of the CT DEEP as well as bipartisan support of the Connecticut Congressional delegation. The Raised Act No. 78 would undo this effort and dramatically impact both the marine industry and recreational boating in Connecticut.

The UOAGYC dredging program certainly benefits our membership by providing a means for safe passage of vessels in and out of the channel and basin. The benefits of the UOAGYC dredging program also are enjoyed by other members of the community at large, including a number of commercial fishing boats that dock across from the UOAGYC marina basin. The West River channel, maintained by the Unit Owners Association at the Guilford Yacht Club, directly supports Brown’s Boatyard, Guilford Boat Yard and the Bayberry Creek Marina. Boaters and business owners at these locations are provided safe and unimpeded passage in the West River channel. These other marinas include both pleasure and commercial fishing vessels. There are also privately maintained oyster beds to the north of the Marina basin in the West River accessed by local commercial oyster. The costs to dredge the channel are borne completely by the UOAGYC, with no fees charged or paid by the other marinas operating along the West River. The prohibition of offshore dredge materials management will likely result in the ultimate failure of the Yacht Club – with cascading effects to the other West River users. Until adequate viable solutions are identified we will continue to rely on offshore dredge material disposal.

The Unit Owners Association at the Guilford Yacht Club has been privately maintaining the West River channel and marina basin for over 18 years to ensure consistent safe navigability. Historically we have used off-shore disposal sites for material management. For at least the past eight years, our dredge materials have been characterized as “clean.”



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Our dredged materials are typically used as cover for more contaminated dredge materials, as directed by the Army Corp of Engineers. We have worked closely with the Army Corp of Engineers and the Connecticut Department of Energy and Environmental Protection (CT DEEP) each year as we develop our dredging plan and schedule.

Over the past year, the UOAGYC has taken initial steps to try to address our dredging needs in a more cost efficient and environmentally friendly manner. We sought to identify alternative dredging methods that would be sustainable in the long term – causing the least amount of disruption to the environment and the Guilford shoreline in general. After consideration of various options, during the 2014/2015 dredging season, the UOAGYC attempted to switch to hydraulic dredging and upland dredge material disposal for our marina basin area. This involved dredging of the spoils from the basin into large filter bags located at an upland bermed area on our property. The intent of the upland spoils management was to reduce the volume of material disposed at offshore dumping grounds and ultimately repurpose the spoils as topsoil in an environmentally friendly manner. Unfortunately, unanticipated complications were experienced in connection with the drainage of the filter bags, which occurred at a much slower rate than anticipated. We were forced to cease the basin dredging project before completing the required dredging.

The upland management of dredge materials has faced another complication. Our permit from the State of Connecticut does not allow for the off-site disposal of materials for fill material or other purposes. We have collected samples of the materials to demonstrate there is no contamination, however the State has yet to provide guidance related to the required salinity levels for off-site management. A comprehensive “residential soils” screening analysis was performed and our materials were well within the established limits. If we are not permitted to seek off-site options for our dredged materials, we have only one or two years of space remaining in our material management area.

We are committed to seeking alternative beneficial uses for our spoils, however as a small private facility, we face significant challenges to identify new options. We continue to look for innovative alternatives, however, until there are scalable projects, we will continue to rely on offshore material disposal for the foreseeable future. We did embark on the initial review of a marsh restoration project, between the East and West Rivers in Guilford in 2014, however the initiative stalled when funding requirements were explored.

The UOAGYC remains committed to finding the best solution on an ongoing basis and continues to evaluate the best and most environmentally friendly course of action. Until new solutions are found, we will continue to rely, at least in part, on offshore disposal for our dredged materials. Our membership is represented by residents of Connecticut, and New York. Of course, I am happy to discuss further with you any of the forgoing. I can be reached at Patrick@gyc.com.

Very truly yours,

Patrick J. Doyle

Unit Owners Association at the Guilford Yacht Club