
LETTERS FROM COUNTIES

Clatsop County

Corps of Engineers Response

September 16, 2002



Commander USAED
Army Corps of Engineers
Attn: CENWP PMF CRCIP
P.O. Box 2946
Portland, OR 97208

2001 Marine Drive, Rm. 253
Astoria, Oregon 97103

Clatsop Economic Development Council Fisheries Project (CEDC Fisheries) has reviewed the Draft Supplemental Integrated Feasibility Report and Environmental Impact Statement for the Columbia River Channel Improvement Project (DSEIS). The following represents CEDC Fisheries' concerns with aspects of the project but is not inclusive of those issues identified by the County Commissioners of Clatsop County in previous correspondence. This letter will only address those immediate issues that are perceived to directly impact the Select Area Fisheries Evaluation (SAFE) program and related research and production projects involving release of salmon smolts and the resulting sport and commercial harvest.

Economic Development
Council
Fisheries Project
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C-1

In its 1993 Strategy For Salmon, the Northwest Power Planning Council recommended that terminal fishing sites be identified and developed to harvest abundant fish stocks while minimizing the incidental harvest of weak stocks. The Council called on the Bonneville Power Administration (BPA) to "fund a study to evaluate potential terminal fishery sites and opportunities. This study should include: general requirements for developing these sites (e.g., construction of acclimation/release facilities for hatchery smolts so that adult salmon would return to the area for harvest); the potential number of harvesters that might be accommodated; type of gear to be used; and other relevant information needed to determine the feasibility and magnitude of the program."

Beginning in 1993 BPA initiated the Columbia River Terminal Fisheries Project, a 10-year comprehensive program to investigate the feasibility of terminal fisheries in Youngs Bay and other sites in Oregon and Washington (BPA, 1993). Project sponsors are the Washington Department of Fish and Wildlife (WDFW), Oregon Department of Fish and Wildlife (ODFW) and Clatsop County Economic Development Council's (CEDC) Fisheries Project. Included in the sites to be studied and eventually fully exploited is the Tongue Point, Cathlamet Bay area presently under consideration for use as a dredge disposal site by your agency. These terminal fisheries are being explored as a means to increase

C-1. See the Corps' responses to state comments S-7 and S-9. The Corps has tried to arrange a meeting with Clatsop County and the affected fisherman on several occasions to discuss the placement of material so that a plan could be developed to minimize impacts to this select area fishery. This effort has met with minimal success. The Corps disagrees that this site will not provide any useable habitat for juvenile salmonids, since tidal marsh habitats are priority habitats to restore in the estuary for listed salmon stocks. Both the NOAA Fisheries and USFWS have evaluated the proposal and support its benefit to salmonids. The Corps also disagrees with your tens of millions (June 14, 2002 letter) and then millions of dollars of annual benefits (September 16, 2002 letter) to the local community from this project. As noted in responses S-7 and S-9, the revised project is over 3,000 feet from the net pen site, and will less than 20% of the area base for the select area fishery at Tongue Point. A large, open embayment comprising over 80% of the acreage base for the select area fishery would remain for use by fishers post-restoration. The Corps would be interested in any data that indicates the value of this fishery to the local economy. Available information suggests that it is a small-scale operation. As noted, the restoration has been reconfigured to minimize any impacts.

the sport and commercial harvest of hatchery fish while providing greater protection for the weak wild stocks, specifically those presently listed under the Endangered Species Act as “threatened” or “endangered”. The project is being conducted in three distinct stages: an initial two-year research phase to investigate potential sites, salmon stocks, and methodologies; a second three-year phase of expansion in Youngs Bay and introduction into areas of greatest potential as shown from the initial stage; and a final five-year phase of establishment of terminal fisheries at full capacity at all acceptable sites.

C-1

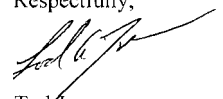
The area targeted by the Army Corps of Engineers between Mott Island and Lois Island deepened to allow for anchorage of military and commercial vessels is an integral part of the Tongue Point terminal fisheries, and as such is one of those deemed most effective in providing select fisheries as envisioned by the Power Planning Council. Significant research is ongoing at that location funded by BPA and the State of Oregon, as well as production releases of fish both from Oregon Department of Fisheries facilities upriver and those of Federal origin funded by Mitchell Act moneys. Next to Youngs Bay, the Tongue Point area represents the site with the greatest potential for terminal harvest by sport and commercial fishers of any in the Lower Columbia River.

We concur with the findings of Oregon Department of Fish and Wildlife that creating a shallow water environment in Cathlamet Bay will result in a major loss to these fisheries. In addition, no credible data is presented to demonstrate that listed stocks transiting the area in their outmigration will be benefited. In fact, with the nearby artificial rookeries created by previous disposal of dredge material (i.e. Rice Island, et al), creating a shallow water environment from existing deep water is likely to increase avian predation on all salmonids transiting the area, including those that are listed. We see the labeling of filling Cathlamet Bay as “restoration” as evidence of short-sited and unprofessional opportunism.

To reiterate, loss of a well-documented terminal fisheries representing potentially millions of dollars per year to the regional economy and the likelihood of exposing transiting smolts to heavier avian predation represents more than sufficient reason to seek other uses of the dredge material. While it is not the purview of our agency to provide solutions to the Corps of Engineers, we are well aware of the State of Oregon’s investigations into beneficial uses of the material that will remove it from the aquatic environment entirely.

We strongly urge those options be investigated rather than seeking quick and dirty solutions that only benefit the proposing agency.

Respectfully,



Tod Jones
Project Manager

- cc Bill Arnold, Clatsop County Community Development
- Matt VanEss, Columbia River Estuary Study Taskforce
- Larry Potter, State of Oregon, Division of Lands
- Tom Byler, State of Oregon, Governor's Office
- Pat Frazier, Oregon Department of Fish & Wildlife
- Patricia Snow, Oregon Department of Fish & Wildlife,
 Habitat Division

June 13, 2002

Laura Hicks, Project Manager
US Army Corps of Engineers
Portland District
333 SW First Avenue
PO Box 2946
Portland, OR 97208-2946

Dear Ms. Hicks:

I appreciate having the opportunity to personally convey to you and Kim Larson concerns that the Clatsop Economic Development Council Fisheries Project (CEDC) have with the Corps proposal to use the turning basin near Lois Island at Tongue Point as a disposal sight for dredging materials produced by the proposed channel deepening project. That the latest terminology for the action is dressed up to be "habitat restoration" is an issue I chose not to address at this time, there still remains issues of economic opportunity loss that are significant and cannot be ignored.

CEDC has been funded for over ten years by Bonneville Power Administration to conduct research on the efficacy of using certain select areas in the Lower Columbia for the rearing and release of salmon smolts intended to be completely harvested by the sport and commercial fisheries. These studies have identified three sites on the Oregon side of the river, that with close management by Oregon Department of Fish & Wildlife, the resulting adult fish returning to those locations can be harvested without significant impact on listed upriver stocks. One of those sites is Tongue Point. The site is conducive to a major harvest by the gillnet fishermen and is frequented heavily by sport fishers who launch their boats at the John Day boat ramp and can be on the fishing grounds in minutes, even in the most inclement of weather.

Our present permitted level of releases at Tongue Point is two million smolts. Depending on the mix of species, their ocean survival, and the rate of interception by the Buoy 10 sport catch and the ocean troll fleet, we can have tens of thousands of catchable fish return to this select area. We are continuing to investigate methods of rearing and release strategies at this location to eventually maximize production, which in the future is likely to be double the present level. We need to conduct trials of various kinds to fully understand the constraints and limiting factors before we increase production. All of this takes many years of trials and monitoring.

Clatsop County



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C-2. See response to comment C-1. For clarification purposes, the area proposed for restoration is the embayment constructed for WW II Liberty vessel moorage. The Lois Island ecosystem restoration feature will not impact the Federal Tongue Point Navigation Channel and associated turning basin.

Corps of Engineers Response

page 2 Laura Hicks June 14, 2002

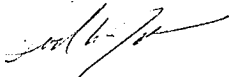
If the project, of which you are manager, proceeds with using the turning basin to dispose of seven million cubic yards of spoils it will eliminate the opportunity for the sport, and especially the commercial fleet to harvest the returning coho and chinook salmon. In addition to Youngs Bay the Tongue Point harvest area, which is fishable by all 603 licensed Oregon and Washington gillnetters and thousands of sport fishers, is the only off-channel body of water capable of providing sufficient space for major select area fisheries. Although other sites have been considered none have the acreage and channel depth that is found at the turning basin at Tongue Point.

C-2

The resulting opportunity loss will be in the tens of millions of dollars to the fishers, the community of Astoria, and the regional economy. Other issues of lost opportunity for the fishers include the development of the area in question as a nursery for juvenile sturgeon. In the last decade this area has become colonized by white sturgeon and supports many sport fishers including several charter boats. Incidental catches of sturgeon in the salmon gillnet fishery at Tongue Point also add to the value of this area as a significant economic driver.

Thank you again for taking the time to come to Astoria and meet with me over these vital issues.

Sincerely,



Tod A. Jones
Project Manager

cc CREST
Bill Arnold
Salmon for All
Larry Potter

COWLITZ COUNTY
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COUNTY COMMISSIONERS
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DISTRICT NO. 2 GEORGE RAITER
DISTRICT NO. 3 JEFF M. RASMUSSEN

Corps of Engineers Response

September 12, 2002

Port of Longview
Attn: Judy Grigg
PO Box 1258
Longview, WA 98632-7739

US Army Corps of Engineers, Portland District
CENWP - PM - E Attn: Robert Willis
P.O. Box 2946
Portland, OR 97208-2946

RE: Columbia River, Channel Deepening Project
Comments on the Draft Supplemental Integrated Feasibility Report and EIS

Dear Ms. Grigg and Mr. Willis:

C-3 | Thank you for the opportunity to comment on the Supplemental IFR/EIS prepared for the Columbia River, Channel Deepening Project. The County supports the dredge improvement project on the Columbia River. Our comments regard the proposed mitigation for this project and its impacts relating to Washington's Shoreline Management Act.

Martin Island:

C-4 | Washington's Shoreline Management Act, enacted in 1971 to protect, restore and preserve the natural resources of the State's shorelines, contains seven major goals. Goals 5 and 6, coming after the goals of protecting and preserving the natural character, resources and ecology of shorelines, direct local governments to "increase public access to publicly owned areas of the shorelines" and to "increase recreational opportunities for the public in the shoreline" (RCW 90.58.020). The County's Shorelines Management Master Program incorporates these goals within its guidelines for development projects.

The Mitigation Plan for the Channel Deepening Project will require shoreline approval and must go through the shoreline permit process. The Plan proposes to fill the man-made embayment in Martin Island to create an emergent wetland. However, the water of the Martin Island embayment is a public resource used for recreational purposes. The boating

C-3. Your support is acknowledged.

C-4. As noted in the opening sentence of the comment, Washington's Shoreline Management Act was enacted in 1971 to protect, restore and preserve the natural resources of the State's shorelines. It also directs local governments to "increase public access to publicly owned areas of the shorelines" and to "increase recreational opportunities for the public in the shoreline." This language indicates that the SMA seeks to further a number of objectives that at times may be mutually exclusive. The intent of the fill in the artificially constructed, privately owned Martin Island embayment is to develop intertidal marsh habitat to benefit both fish and wildlife resources, ESA listed salmonids and bald eagles, which reflects the SMA's intent to protect, restore, and preserve the natural resources of the state. This action, along with riparian forest restoration on Martin Island, would constitute a restoration of natural resources of the state that have been severely impacted by diking and development in Cowlitz County and elsewhere in the lower Columbia River. Recreational fishermen, such as those who intensively use the mouth of the Cowlitz in spring and fall fisheries, would benefit from restoration of fisheries habitat in the lower Columbia River. The Corps acknowledges that furthering this restoration objective may affect recreational use, but note the following.

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public use the embayment for both daytime and overnight moorage. On weekends, staff has counted more than 20 boats moored there. During the week, there are usually three more boats moored in the embayment. The embayment provides a fairly safe and secure area for these recreationists. There is no other similar feature anywhere in Cowlitz County that could be readily substituted or created to serve the same purpose as the Martin Island embayment.

C-4

Over the past several years, County staff has met with representatives from the US Army Corps of Engineers, Port officials, various consultants, and Washington State Department of Ecology staff at several meetings to discuss issues of concern regarding this project. At each of these meetings, County staff has suggested that the Martin Island mitigation plan is flawed because it calls for filling the embayment and thereby decreasing public access and recreational opportunities on the Columbia River in Cowlitz County. The proposal is inconsistent with the goals and policies of both the Shoreline Management Act and the County's own Shorelines Management Master Program.

However, staff has proposed an alternative at the meetings referenced above. The alternative involves the Woodland Bottoms mitigation site.

Woodland Bottoms:

The Woodland Bottoms mitigation plan requires the constant supervision and interaction of human beings to be successful. The required human activity involves constant monitoring and management of the flow of water into the proposed mitigation site. No firm agreements have been reached among the various agencies for the long-term commitment that will be required to manage the proposed wetland. It would be far better to create a wetland that is self-sustaining. The County suggests that the design be altered to make the proposed wetland self-sustaining and eliminate the need for human intervention for the lifetime of the project, which is 50 years. It may be possible that the flood control dike adjacent to the site be breached to allow the natural flow from the Columbia River to inundate the site.

C-5

The purpose of the existing dike is to protect farmland on the inside of the dike from Columbia River floods. This existing flood control dike could be relocated to the proposed levee site in the Mitigation Plan, thereby continuing the protection of adjacent farmlands, but allowing the proposed new wetland area to become self-sustaining. Dredge material could be used in the construction of the replacement levee. Water from Burriss Creek would no longer have to be pumped into or out of the site. Water would simply flow naturally into the designated wetland area from the Columbia River.

Further, the dredge material currently proposed for placement in the Martin Island embayment could be placed in the Woodland Bottoms site instead. The Woodland Bottoms site is well below the ordinary high water mark of the Columbia River and would require substantial quantities of fill material to bring it high enough to create the emergent wetland conditions described in the Mitigation Plan. These changes would accomplish three goals: maintaining public access to an existing recreation site; providing a large area to receive dredge spoils; and, eliminating a costly and time

C-4 (con't). The shoreline of Martin Island is privately, not publicly owned. The land underlying the embayment is also privately owned although the water is a public resource. Information we have gathered from conversations with resource agency personnel, Bernie Bills (formerly with Port of Vancouver), and numerous trips on Interstate 5 past the site indicate that recreational boating use of the embayment occurs primarily between Memorial Day and Labor Day. Use is incidental in nature (0-3 boats) most days except for Memorial Day, the Fourth of July and Labor Day weekends when use can apparently be fairly intensive. The Corps' anecdotal information also suggests that the majority of boaters that utilize Martin Island embayment embark from the Portland-Vancouver area and then return. While the Corps recognizes that this individual action would not restore the fishery in and of itself, it is the cumulative nature of the restoration actions that would ultimately accomplish this objective.

Martin Island supports a bald eagle nest near the embayment. Recreational boating activities in the embayment, particularly fireworks over the Fourth of July, could compromise this nesting effort and does not represent a good protection effort. The restoration of wildlife and wildlife habitat at Martin Island also could be compromised in the future due to trespass and vandalism associated with retention of recreational boating in the embayment.

In response to the County's comments, the Corps, in consultation with attending members of the interagency mitigation team and the county, has revised the proposed mitigation action at Martin Island. The current proposed action is consistent with the Washington Shorelines Management Act and the County's Shoreline Master Program.

C-5. Cowlitz County's proposal to set back the main flood control dikes at Woodland Bottoms does represent an optimum restoration plan for this location. The Corps previously investigated this proposal. However, it became apparent that construction of approximately 7,000 lineal feet of main flood control levee at an estimated cost of \$1,000/lineal foot (\$7,000,000 for that element alone) did not represent a cost effective approach.

The Corps disagrees that the mitigation plan presented will require "constant supervision and interaction of human beings to be successful." It is not significantly different than management practices at other wildlife management areas such as Ridgefield National Wildlife Refuge. The Corps is prepared to offer an alternate proposal to the interagency wildlife mitigation group for the Woodland Bottoms site that would setback the levees encompassing Burriss Creek (not the main flood control dikes) and allow for the stream to disperse its waters across the mitigation site. Additionally, through provision of a tidegate for Burriss Creek within the mitigation area (a proposed ecosystem restoration feature), Columbia River waters could be allowed to enter and exit the mitigation site except when the river exceeds certain predetermined elevations that could exceed the capacity of the setback dikes. This would accomplish the objective of a more self-sustaining wetland while still maintaining flood protection to adjacent private property.

Disposal of dredged material will not occur on Woodland Bottoms.

consuming plan for human interaction at a wetland mitigation site.

Ecosystem Restoration Plan: Hump-Fisher Islands

The County has some concerns regarding the Hump-Fisher Ecosystem Restoration Plan. This Plan identifies the embayment between Hump Island and Fisher Island as containing warm water that may negatively impact salmonids and other threatened aquatic species. The Plan proposes to open the area at the upstream end of the embayment so that the river can flow between the islands rather than backing up between them. This new flow is to provide improved habitat for threatened and endangered fish. Our review of this Plan did not disclose any discussion of the impacts to Fisher Island and the wildlife it contains from this proposal. Although the Draft EIS disclosed that placement of dredge spoils on Hump Island should have no negative impact to any of the Fisher Island wildlife, there is no discussion regarding the impacts of flowing water of the south side of Fisher Island. What is the potential for erosion to occur on the south side of Fisher Island and to the South Side of Willow Grove due to the proposed flow? Could erosion from the proposed flow endanger the habitat of existing Osprey and Bald Eagle nests, or the Heron rookery? Could opening up this area have any impacts to the existing channels in the area, such as Fisher Slough?

Thank you for providing this opportunity to comment. We look forward to your response.

Sincerely,



Kenneth C. Stone, P.E.
Acting Building and Planning Director

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C-6. We do not anticipate any impacts to Fisher Island wildlife habitats from provision of a small, open channel where Fisher and Hump Island connect. Historically, Hump Island did not exist and the Columbia River would have run a substantially greater volume of water past Fisher Island. Islands comprised of native soils are less prone to erosion than islands formed from dredged material. Flows through the constructed channel would enter the embayment which has a significantly greater cross-section than the channel and thus the velocity is dissipated which also reduces the potential for erosion at Fisher Island or Willow Grove.

Some erosion may occur at the immediate channel post-construction. We will monitor the situation to determine if erosion that may occur poses a problem to either Hump or Fisher Island or other areas of concern. The material that may erode is former dredged material comprised of medium to coarse-grained sands. This material would settle immediately downstream of the mouth of the constructed channel and would not extend downstream to Willow Grove. A natural breach of the dredged material formed isthmus connecting Lord and Walker Islands immediately upstream of the proposed channel at Fisher-Hump Islands exhibits a slight outwash of material from the shoreline downstream of the opening there. A similar channel that separates Miller Sands Island from Miller Sands Spit in the Columbia River estuary also exhibits some sediment collection downstream of the opening, presumably from erosion in the channel, upon which intertidal marsh habitat has colonized. The channel at Miller Sands has not appreciably changed in width since formation in 1976 although there is evidence of some erosion horizontally and vertically of the channel. Similar channels between small islands in the Lord-Walker Island complex have not resulted in erosion of other parts of the islands downstream of their mouths based upon review of a 1996 aerial photograph.

The constructed channel will have no effect on Fisher Slough, as the proposed action will not significantly alter the hydraulics of the area.