



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

August 21, 2003

Reply to
Attn of: ECO-083

Colonel Debra M. Lewis
District Engineer
Seattle District, Corps of Engineers
P.O. Box 3755
Seattle, Washington 98124-3755

RE: Public Notice CENWS-OD-TS-NS-21, U.S. Army Corps of Engineers, Placement of Transition Gravel and Cobble, Westport, Washington

Dear Colonel Lewis,

Thank you for the opportunity to comment on the above referenced public notice and supporting draft environmental assessment (EA), that proposes placement of 27,000 cubic yards of gravel and cobble material along the shoreline of Half Moon Bay, adjacent to the Grays Harbor south jetty. The proposed gravel/cobble placement is described as an *interim measure* to stabilize the Half Moon Bay shoreline and reduce the risk of another breach occurring at that site until a long-term management strategy can be formulated and implemented. In other words, the premise of the current interim action is to forestall an inevitable breach until a "solution" is developed in the intervening several years. A transparent and credible process for planning and then pursuing a long-term management strategy is therefore absolutely critical.

U.S. EPA is concerned by the current lack of coordination and direction provided by the Seattle District Corps of Engineers (Corps) toward a long-term planning effort. As the current proposal is interim only, it is critical this effort be initiated immediately. Since 1993 the Corps has pursued a number of project-specific efforts aimed at various Half Moon Bay erosion "symptoms." These activities are listed in the EA, and were pursued and supported by different branches within Seattle District and by the City of Westport, depending on the project goal and urgency. This piecemeal approach has resulted in a confusing mix of reports and information, on-the-ground construction, and real and perceived environmental effects that require synthesis in an overall coordinated and cooperative effort. In addition, pursuit of relatively focused and short-term measures has prevented the necessary consideration of erosion in a larger geographic scale and longer time frame. This is especially critical for areas south of Half Moon Bay that may be affected by management choices in Half Moon Bay.

It is also critical that technical work done in support of a long-term planning effort receive peer review. Peer review is necessary for coastal process and predictive modeling technical work that is to provide the underpinnings for a long-term solution. Eventual alternatives based on technical work that lacks appropriate coordination and review will lack

credibility, and will ultimately undermine our mutual goal of achieving a clear and acceptable long-term solution/strategy. We would like to work with you on a peer review strategy to ensure adequate review of the technical work that will provide a foundation for long-term planning and decision-making.

With the above discussion in mind, U.S. EPA does not oppose an interim action subject to the following conditions:

1. The Corps should begin immediately to coordinate and develop a transparent and credible process for planning and then pursuing a long-term management strategy to address ongoing erosion management issues at this site. The process should include a review of the Corps past commitments and work, and include scoping and coordination of technical studies, e.g., modeling and environmental studies, that will support analysis of alternatives and their environmental effects. In addition, consistent with NEPA, the long-term planning effort/study must provide the process and information necessary for analysis of the cumulative and secondary effects of any alternatives.
2. As part of the long-term management strategy, the Corps should coordinate with U.S. EPA and other agencies and stakeholders on development of a peer review strategy to ensure appropriate peer review of the technical work that will provide a foundation for long-term planning and decision-making.
3. The Corps should reconsider the use of cobble and gravel on the beach of Half Moon Bay. In the absence of mitigation, and as described, this project and its effects are to be “interim” in nature. Accordingly there should be “interim” effects on the environment and the beaches of Half Moon Bay. We do not see an analysis of this issue in the EA, including prediction of the final surface area of the Bay that will be affected in the longer term when proposed rocky material is moved and redistributed. A long-term redistribution analysis (affected surface area and elevations) should be incorporated in the EA for each of the alternatives. In any case, the alternatives incorporating cobble/gravel will be a relatively permanent feature on the beach once distributed, and could contribute to much longer term cumulative effects and loss of sandy habitat in the area than the stated five year horizon. In addition, information could be gained in support of the long-term management strategy through placement and then monitoring of sandy fill material at this location. Monitoring of sandy fill combined with additional modeling studies and analyses could help identify a new equilibrium shoreline position and provide information to help assess the cost effectiveness of maintaining the western side of the Half Moon Bay shoreline in its current position. We ask that the Corps provide an interagency and stakeholder forum to discuss the proposed rock fill versus sand fill and the overall costs and benefits of each before deciding which alternative to pursue.
4. The Corps should incorporate the attached comments into the draft EA, or respond to our comments. If you do not agree with our comments, or would like to provide clarification please provide a response. Failing revisions to the EA or lack of receipt of a response, U.S. EPA reserves the right to revisit our position on this project.

For further coordination and discussion of the specifics of this project or the long-term management strategy, please contact Justine Barton, at (206)553-4974 or Otto Moosburner, at (206)553-5198.

Sincerely,

Michelle Pirzadeh, Acting Director
Office of Ecosystems and Communities

Enclosure

cc. w/enclosure

WDNR (Peter Leon)

NOAA Fisheries (John Stadler)

USFWS (Gwill Ging)

USGS (Guy Gelfenbaum)

State Parks (Bill Jolly)

WDFW (Bob Burkle)

Ecology (Helen Pressley, George Kaminsky)

City of Westport (Randy Lewis)

Surfriders Foundation (Kevin Ranker)

FOGH (Arthur Grunbaum)

Enclosure

Specific Comments on Draft Environmental Assessment
Half Moon Bay Transition Gravel and Cobble Placement
July 2003

Overall the EA is easily read and well-written. Our specific comments are provided below.

1. P. 1. Section 1.1 paragraph 2. In the EA, some issues that were uncertainties in the past were stated as certainties without appropriate references or substantiation. At the time of each “crisis” event, there were uncertainties. Actions were taken to alleviate concerns and the *potential* risk, though an absolute determination may not have been made. In this and future long-term planning documents all parties must avoid stating past perceptions as fact if that analysis was not done and reviewed.

Ie. statements such as the following, “The breach was also determined to be a potential threat to the stability of the south jetty, and there was concern that the breach could cause adverse impacts to the maintenance of the navigation channel by capturing much of the Harbor’s ebb flow.” Please provide the reference where this determination was made.

2. P. 3. Section 1.2 paragraph 2. Same issue as #1 above. Provide clear reference supporting statement, “...monitoring has shown that the transition material was actually exacerbating erosion of the breach fill sand due to the reduced footprint and quantity of material placed.”

3. P. 3 Section 1.2 paragraph 2. Same issue as #1 and 2 above. Provide clear reference supporting the statement, “At the location of proposed transition beach termination, the wave approach angle is nearly perpendicular to the shoreline so the long shore transport potential is reduced and much less end-cutting is expected.”

4. P. 3 Section 1.2 paragraph 4. The project purpose (or action as described) has two goals: replenishing eroded area and preventing end effects.

5. P. 5 Section 1.4 Provide reference to the analysis that show this statement to be true, “The proposed work is intended to maintain Corps access to the South Jetty and prevent another breach from threatening the stability of the jetty; therefore, it is within the Grays Harbor and Chehalis River Project operations and maintenance (O&M) authority.” While this statement may be true, we are not aware of current work supporting the contention that a breach will threaten the stability of the jetty. This is a “fact” that should be explored/modeled/analyzed as part of the long-term study.

6. P. 6 Section 2 paragraph 1. While we appreciated having a forum for discussion, the actual purpose of the March 2003 meeting was not clear to us either prior to or following the meeting. We were not aware that exploring specific interim short-term solutions was the purpose of the meeting. This is an example of our (and others) confusion over who is in charge and leading/guiding future planning actions to address erosion in this area. Subsequent to the meeting in March, we did not receive additional information on the Corps’ intended actions until the public notice arrived in July 2003.

7. P. 6 Section 2 paragraph 1, line 7. “Further study is...” should read “Further study and coordination is...”

8. P. 6 Section 2 paragraph 2. The EA states, “Under all of these alternatives, the Corps would continue to place sandy material dredged from the Grays Harbor navigation channel at near shore

and direct beach disposal sites in Half Moon Bay and off of South Beach to replace some of the material lost through erosion.” U.S. EPA is very supportive of the excellent efforts the Corps navigation plant branch and the Corps hopper dredges have made to support beneficial placement of dredged material at the mouth of Grays Harbor. We are uncertain as to the Corps’ priority ranking of the various potential beneficial use sites/activities and why the Corps may dispose at any particular site relative to another in any particular year. While the Corps has asked previously for comment on beneficial use alternatives, it is difficult to comment when we are not aware of how the Corps currently makes these choices and the Corps’ considerations/limitations. This discussion should take place in the context and forum of the long-term strategy.

9. P. 11 Section 3 paragraph 2. What is the expected surface area (the area converted from sand to rock) that would be covered by the rocking alternatives, including the proposal? How do they differ?

10. P. 12-13 Section 4.3. While this section notes the potential presence/absence of species, it does not discuss *how* they are likely to use this site, and therefore does not set up the later discussion of how the proposal affects their use of the site. The discussion should also cover areas (elevations) where rock redistribution would be likely.

11. P.13 Section 4.3 paragraph 2. What reference supports the contention that the noted shellfish are not present at the site due to high wave energy? If they may be present, they should be specifically covered in the Environmental Effects section. Also, remove word “waters” from first sentence in this paragraph.

12. P. 15 Section 5.3 paragraph 3. Information on “forage fish spawning” is important and is a glaring lack at this site given the amount of construction that has occurred to date. Acquisition of this data should be a priority. For the current analysis, are the characteristics of Half Moon Bay consistent with forage fish spawning areas? If so, effects to forage fish cannot be ruled out at this point.

13. P. 15 Section 5.3 paragraphs 2 and 4. While no direct impacts to salmonids are anticipated due to construction, a change in the nature of their foraging area (both from placement and redistribution) would occur with the proposal. While there may be uncertainties re. the nature of the change and real differences between the 6 and 12 inch rock alternatives, there can be an analysis made of the change from sand to rocky substrate at a minimum...both for salmonid foraging and benthic invertebrates.

14. P. 15 Section 5.3 paragraph 5. Won’t shorebird foraging be affected by the change from sand to rock in the 1000 foot alignment, especially as material redistributes from the construction footprint? How much of the shoreline of Half Moon Bay has been affected by current and past “interim” rock placement from the shorebird standpoint? Do they use this relatively sheltered area? The description of the proposed activity as causing localized and temporary displacement for wildlife may not be a correct assumption for shorebird foraging.