



August 21, 2003

Mr. Hiram Arden (OD-TS-NS)
US Army Corps of Engineers
Navigation Section
P.O. Box 3755
Seattle, Washington 98124-3755
hiram.t.arden@usace.army.mil

Ms. Aimee Kinney
Environmental Resources Section
US Army Corps of Engineers
P.O. Box 3755
Seattle, Washington 98124-3755
aimee.t.kinney@usace.army.mil

Reference: CENWS-OD-TS-NS-21

FOGH (Friends of Grays Harbor) is a broad-based 100% volunteer tax-exempt 501(c)(3) citizens group made up of crabbers, fishers, oyster growers and caring citizens. The mission of FOGH is to foster and promote the economic, biological, and social uniqueness of a healthy Grays Harbor estuary. The goal of FOGH is to protect the natural environment, human health and safety in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment.

We appreciate this opportunity to comment on the above reference proposed placement of transition gravel and cobble at Westport, Washington. While we recognize that there is evidence of severe but natural shoreline retreat in the subject area, we have several concerns.

1. The Corps has chosen to use the more drastic approach of a 12" and under cobble berm on a normally sandy beach. Comparing the limited use of cobble berms around our area, we note that the berm created about four years ago in Cape Lookout State Park on the Oregon coast used the average size of 10 cm (3.94") for the cobbles. This size was compatible and essentially looked like any other cobbled beach in Oregon.
2. Several members of FOGH and their acquaintances have difficulty navigating unstable ground. Cobbles and large gravels attract marine vegetation and can become extremely slippery. An ADA (American Disabilities Act) approved restroom is available at the parking lot of Westhaven State Park and Half Moon Bay beach access is provided close by. What is the effect on access to the beach of placement of 2" - 12" cobble on an otherwise sandy beach to persons unable or challenged to transverse unstable ground? Is this compatible with the American Disabilities Act?

3. It appears that over 1/3rd of Half Moon Bay would be converted from sand to the cobble/large gravel substrate. What is the planned mitigation for public access for this if the proposed action is approved?
4. A recent stakeholders meeting held in March of 2003 by the Corps of Engineers left the impression to many of the attendees that the previous solution of large rock and gravel placement (January 2002) was moderately productive, was environmentally unfriendly and would not be considered for future attempts to find an erosion solution. We were therefore, quite surprised by this proposed project which intends to place in excess of 40,000 tons of rock on the beaches. What and/or who influenced the Corps to change it's direction from a more soft solution?
5. If cost was considered to be a factor, what is the cost of limiting access to a certain portion of the public and has that been taken into account?
6. Half Moon Bay provides habitat for a variety of fish species, including smelt, Pacific herring, starry flounder, shiner perch, sand lance, northern anchovy, Pacific sanddab, lingcod, redbtail surfperch, sand sole, threespine stickleback, and Pacific staghorn sculpin (R2 Resource Consultants, 1999). Salmonids, including chinook, coho, and chum salmon along with steelhead, bull trout, and cutthroat trout, also utilize Half Moon Bay. What is the effect of the placement of the proposed cobble on the intertidal area? How will this affect those species (e.g., smelt) that are dependent upon sand and gravel sizes of .5mm to 2mm (.02" - .08") in diameter? What effect would this have on bivalves and other shallow-water molluscs in this area?
7. The proposed project highlights the extreme erosion that is being experienced in this highly dynamic coastal area and we appreciate that the Corps is aware of this natural process. The project intends to place approximately 40,000 tons of rock in an attempt to defer further erosion. Severe end cut erosion was cited in the Environmental Assessment (EA) as a result of the placement of 17,400 tons in 1999 - 2000. The proposal under review today proposes additional rock and gravel to be placed along roughly 1,000 ft of shoreline, covering almost three acres. This will extend further eastward as natural wave forces curl around the bay. Rock and other fixed or semi-fixed methods of anchoring the forebeach almost always result in scouring or end cut erosion. Why would this placement not create a similar erosion pattern?
8. We are concerned that this project will be the fourth placement of material on the beach and there has not been a NEPA review of the action. Please explain how this is not a piecemeal approach to erosion and why a full NEPA EIS is not required.
9. The breach of 1993 was over 10 years ago. The proposal states that this is an interim five-year measure until a long-term solution can be studied. What are the plans to make sure that the public is involved in this process? What sort of peer review process will be in place for the future proposals and recommendations? The decision-making process for projects such as these



needs to involve and engage the public in a meaningful way. Conversions of public resources which will alter the public access and potentially interfere with natural processes needs to have careful review. As we have learned from other areas, engineered solutions sometimes give false assurances to land use decision-makers, thus allowing inappropriate development in dynamic areas. The public needs to make sure that it understands the potential investment of public funds to protect private property.

Thank you for attention to this very important matter,
Sincerely,



Athur (R.D.) Grunbaum
FOGH (Friends of Grays Harbor)
<http://www.friendsofgraysharbor.org>

