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In Re: Notice of Application for Water Quality Certification and for
Certification of Consistency with the Oregon and Washington Coastal Zone Management
Program Project commonly known as Columbia River Deep Draft

FOGH (Friends of Grays Harbor) and the Pacific Northwest Regional Office of the Surfrider Foundation appreciate this opportunity to comment on the above referenced Certifications.

FOGH 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 and human health in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment.

The Surfrider Foundation is a 501 (c) (3) non-profit grassroots organization dedicated to the protection and preservation of our world's oceans, waves and beaches. The Surfrider Foundation maintains over 35,000 members and 60 chapters across the United States and Puerto Rico, with international affiliates in Australia, Canada, Europe, Japan and Brazil. The Surfrider Foundation consists of watermen and women. We are surfers, fishermen, divers, kayakers and beachgoers – people who spend a significant amount of time on the coast and in the ocean. Surfrider Foundation recognizes that protecting coastal and marine areas benefits not only diverse fish and wildlife populations, but also the people who enjoy and depend upon them.

We have reviewed proposed project and believe that the request for Certification does not meet the standards to which they were written and should not be granted. We are deeply concerned with a project justification that seems to rely on a “if we dredge they will come” philosophy. A review of departure depth based on information presented by the Port of Portland and Columbia River Pilots, shows the percentage of time that vessels with given departure depths can depart without delays. At

the common departure depths of 38-39 ft., vessels can depart between 88.6% and 73.8% of the time without delays in the existing 40-ft. channel. These departure “windows” are apparently acceptable to container vessel operators. An hour or two delay of departure does not appear to warrant expense of some 156 million dollars and the environmental dredging and disposal impacts of over 18 million cubic yards of spoils.

We are concerned that the overdraft to 43 feet and 48 feet has not been addressed for its environmental impacts.

The proposed action is to deepen the Columbia River Federal Navigation Channel in Washington and Oregon between Columbia River Mile (CRM) 3 and CRM 106.5 from the currently authorized 40-foot depth with advanced maintenance to 45-feet, to an authorized depth of 43-feet with advanced maintenance to 48-feet based on the recommendations in the *Final Integrated Feasibility Report for Channel Improvements and Environmental Impact Statement* dated August 1999 and the *Draft Supplemental Integrated Feasibility Report and Environmental Impact Statement* dated July 2002. *Water Quality Application, Description of Project*

Our organizations are particularly concerned that channel deepening and subsequent removal of sediment from the river will change the estuarine bathymetry and substrate characteristics. These modifications will, in turn, influence physical processes such as salinity and temperature patterns, flushing rates, nutrient and detrital transport. We are concerned that changes in salinity intrusion may alter the estuarine turbidity maxima thereby negatively impacting the availability of food sources for juvenile salmonids. Changes to these processes ultimately influence water quality, nearshore habitat productivity, and community structure.

The deepening project removes a large quantity of sand from the lower Columbia River, estuary, and adjacent nearshore region. Columbia River sand is needed to maintain the littoral cell between Point Grenville, Washington and Tillamook Head, Oregon. The proposed project, by use of both upland disposal and deep-water ocean disposal will result in a net removal of sand from the system. This will cause significant unacceptable shoreline recession of the Long Beach Peninsula and areas north and south of project area. Severe erosion at Westhaven State Park and Half Moon Bay in Westport, Washington has recently required the Corps to augment sand placement in that area. Cumulative effects of dredging and placement of spoils is not adequately discussed to the balance of the Columbia River Littoral Cell. The coasts of Washington and Oregon are experiencing significant erosion. The Southwest Coastal Erosion Study emphasizes this potential for a shoreline retreat of 150 meters. This project as now proposed may exacerbate this further.

Construction of a deeper channel and disposal of dredged sediments as proposed is likely to impact crab habitat through disturbance of available food resources and removal of coarse protective cover substrate. Shell coverage due to sedimentation, bioturbation, and storm scour needs to be quantified so that habitat needs can be assessed for this important fishery. In addition to crab, the project will have estuarine impacts which will have direct, indirect and cumulative impacts on Columbia River Smelt, Sturgeon, and ESA salmonid populations.



Congress found in their 1990 reauthorization of the Coastal Zone Management Act of 1972 that the “habitat areas of the coastal zone, and the fish, shellfish, other living marine resources, and wildlife therein, are ecologically fragile and consequently extremely vulnerable to destruction’s by man’s alterations” [302 (a) amended by PL 101-508].

As noted in the introductory remarks of the 1990 reauthorization: “Marine resources contribute to the Nation’s economic stability. Commercial and recreational fishery activities support an industry with an estimated value of \$12,000,000,000 a year.”

Section 2(c) of the National Aquaculture Act of 1980, as amended notes: “...aquaculture has the potential for reducing the United States trade deficit in fisheries products, for augmenting existing commercial and recreational fisheries, and or producing other renewable resources, thereby assisting the United States in meeting its future food needs and contributing to the solution of world resource problems. It is therefore in the national interest, and it is the national policy, to encourage the development of aquaculture in the United States.”

Wetlands also play a critical role in sustaining the coastal economy and environment by supporting and nourishing fishery and marine resources. They also protect the Nation’s shores from storm and wave damage. Coastal wetlands contribute an estimated \$5,000,000,000 to the production of fish and shellfish in the United States coastal waters. Yet, over 77% of its tidal swamp and 43% of the Columbia River estuary historical marsh has been lost since 1870. This proposal portends additional loss of essential fish habitat and impacts to the sand budget for the Columbia River Littoral Cell.

There is a clear link between coastal water quality and land use activities along the shore including dredge spoil stockpiling. Coastal planning and development control measures are essential to protect coastal water quality. Currently, not enough is being done to manage and protect coastal resources.

The legislative history indicates that the central purpose of section 6217 is to strengthen the links between Federal and State coastal zone management and water quality programs and to enhance State and local efforts to manage land use activities that degrade coastal waters and coastal habitats.

It is the charge of the regulators to identify land uses which, individually or cumulatively, may cause or contribute significantly to a degradation of (a) coastal waters where there is a failure to attain or maintain applicable water quality standards or protect designated uses, or (b) coastal waters that are threatened by reasonably foreseeable increases in pollution loading from new or expanding sources. The Columbia River is already water impaired as documented by the Washington Department of Ecology and their monitoring sampling. High enterococcus bacteria counts were detected during a reconnaissance survey in 1991 which indicated a possible public health risk in the lower Columbia



River. The purpose of this project was to determine if a chronic public health risk exists during high contact recreation periods due to bacteria contamination. Ecology sampled 12 stations between the mouth of the Columbia River and river mile 170 (Hood River) weekly from September 1 to October 12, 1992. Fecal coliform and enterococcus bacteria were monitored, as well as oxygen, temperature, pH, and conductivity. A 1998 review, found problems with arsenic, PCBs, dissolved oxygen, temperature, turbidity and fecal coliforms. However, references to it's 303d listing was not found in the Water Quality Application.

Because global warming may result in a substantial sea level rise with serious adverse effects in the coastal zone, coastal states must anticipate and plan for such an occurrence. Nowhere can we find this critical issue discussed by the proponent.

Land uses in the coastal zone, and the uses of adjacent lands which drain into the coastal zone, may significantly affect the quality of coastal waters and habitats, and efforts to control coastal water pollution from land use activities must be improved. The placement of dredge spoils on upland areas does not adequately discuss the effects of this placement to the adjoining properties or aquatic resources.

We believe that the cumulative impacts of all dredging and erosion proposals in Grays Harbor, Willapa Bay and the Columbia River must be considered as one project. By analyzing these projects separately the environmental significance is underestimated. We believe that the information in the applications is deficient and that they should be denied.

Thank you for your consideration

Sincerely yours,



Arthur (R.D.) Grunbaum
FOGH (Friends of Grays Harbor)



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