



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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DEPARTMENT MISSION: SOUND STEWARDSHIP OF FISH AND WILDLIFE

February 24, 2000

Colonel Randall J. Butler
District Engineer, Portland District
U.S. Army Corps of Engineers
Post Office Box 2946
Portland, Oregon 97208-2946

Dear Colonel Butler:

The Washington Fish and Wildlife Commission appreciates your acceptance of our January 24, 2000 invitation to attend an upcoming Commission meeting. We understand that the project manager for the Columbia River Navigation Channel Deepening Project, Laura Hicks, has agreed to attend our March 17, 2000 Commission workshop in Olympia. In the interest of making the best use of your staff time, we have prepared the following issues list. The list is intended to communicate our areas of concern and to provide some guidance or focus for the discussion we hope to entertain during the March 17 workshop. It consists of unresolved issues identified by Washington Department of Fish and Wildlife (WDFW) staff during the environmental review process for this project.

- **Potential for Future Deepening Projects** -- Puget Sound ports are dredging to depths of fifty feet to prepare for the newer cargo ships. How long will the proposed forty-three foot depth in the Columbia River be appropriate for the modernizing shipping fleet, and what is the maximum anticipated channel depth?
- **White Sturgeon** -- WDFW staff recommended that the Corps initiate a program to identify and implement methods that will reduce dredge impacts on adults and juveniles. The program should include ongoing monitoring to avoid disposal impacts on habitat and benthic organisms that are used for food. Our objective is a collaborative operation that will allow continuous population monitoring to avoid long-term adverse population impacts.
- **Columbia River Smelt** -- WDFW staff recommended that the Corps identify and implement methods to locate and avoid disposal impacts on smelt spawning habitat, and adjust the schedule or choice of equipment to eliminate dredge entrainment impacts on larval smelt.

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- **Dungeness Crab** -- WDFW staff recommended that the Portland District enter into a Dungeness crab monitoring and mitigation agreement similar to the "September 1998 Revised Crab Mitigation Strategy Agreement" signed by the State and the Seattle District of the Corps regarding dredging impacts in Grays Harbor. This agreement resulted in the protection of crab in Grays Harbor during ongoing dredging and disposal with the use of monitoring prior to each action; appropriate adjustments in timing, location, and equipment selection to reduce impacts; and with compensatory mitigation (resource replacement) for unavoidable impacts.
- **Stranding of Juvenile Salmon and River Bank Erosion** -- WDFW staff recommended the inclusion of measures to reduce riverbank erosion and eliminate the stranding of juvenile salmon that will result from larger wave action from deeper draft ships. This concern was shared by the National Marine Fisheries Service (NMFS) in their Biological Opinion. The NMFS' document requires a stranding monitoring program and speed limits on cargo ships.
- **Adjustments to Construction Plans** -- WDFW staff recommended a construction plan revision to: (1) restrict dredging operations during critical life stages and migratory time periods; and (2) implement proper precautions with timing, pressure limitations, and pre-blast exclusionary techniques for underwater blasting operations.
- **Coastal Erosion and Beneficial Use of Dredge Material** -- WDFW staff recommended that ocean disposal of dredge material be conducted in a manner that does not impact productive crab and flatfish habitat, keeps similar grain size material together, and adds the material to eroding beaches (like Benson Beach) or places the material in the high-energy zone near the beach. With the Governor's Office, WDFW asked the Corps to work with the State and local communities suffering from coastal erosion to facilitate disposal options that would make Columbia dredge spoils a better source of replenishment for eroding beaches.
- **Feasibility and Practicality of Mitigation Measures** -- The Governor's Office recommended that the Corps enter into a Memorandum of Understanding (MOU) with WDFW and the State. As envisioned, the MOU would define the expected products, and the level of participation on the part of WDFW staff in the planning and implementation of the proposed studies and mitigation measures. This approach is intended to ensure that the State can endorse the scientific integrity of any proposed studies, and to ensure that the results of the studies are implemented as mitigation for this project. As a result of the December 1999 Biological Opinion from NMFS, WDFW is also requesting that the Corps provide funding for WDFW staff participation in the planning and implementation of the measures required in the Biological Opinion.
- **Water Quality Protection** -- WDFW staff continue to be concerned with bioaccumulation and other potential impacts resulting from the re-suspension of toxic material and would appreciate more information regarding plans to deal with contaminated sediment in the Willamette River.
- **Avoidance of Unanticipated Impacts** -- The Caspian tern colony on Rice Island is an example of an unanticipated impact that we want to avoid in the future.

Colonel Randall J. Butler

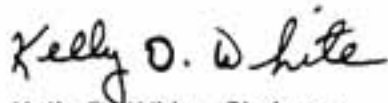
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- **Ongoing Operations Continue Without Mitigation** -- WDFW staff recommended that ongoing maintenance dredging and disposal impacts, along with seventy years of unmitigated impacts, begin to be addressed under the authority and appropriation associated with this deepening project.
- **Implementing and Evaluating Proposed Mitigation Measures** -- Will the Corps implement and evaluate the proposed mitigation measures before the dredging is conducted? What will the Corps do if the proposed mitigation measures are not effective? How will the Corps ensure that Congressional appropriations are sufficient to implement the proposed mitigation?

Thank you again for your willingness to work with us to discuss our concerns with dredging activities in the Lower Columbia River, and to help us understand your project objectives. We appreciate your office responding to our request of your participation at our March 17 Commission workshop, and look forward to the opportunity to meet and address these important issues.

Sincerely,



Kelly D. White, Chairman
Washington Fish and Wildlife Commission

KDW:nb

cc: Governor Gary Locke
Jennifer Belcher, Commissioner of Public Lands
Oregon Department of Fish and Wildlife
Washington Fish and Wildlife Commission
Jeff Koenings