

PACIFIC FISHERY MANAGEMENT COUNCIL2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201CHAIRMAN
Jim LoneEXECUTIVE DIRECTOR
Lawrence D. Six

Telephone: (503) 326-6352

October 22, 1999

U.S. Army Corps of Engineers
Policy Review Branch, Attention CECW-AR-(IP)
7701 Telegraph Road
Alexandria, VA 22315-3861

To Whom It May Concern:

Re: "Final Integrated Feasibility Report for Channel Improvements and Environmental Impact Statement: Columbia and Lower Willamette River Federal Navigation Channel"

The Pacific Fishery Management Council (Council) was created by the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) in 1976 with the primary role of developing, monitoring, and revising management plans for fisheries conducted within federal waters off Washington, Oregon, and California. Subsequent congressional amendments in 1986, 1990 and 1996 added emphasis to the Council's role in fishery habitat protection. The 1996 amendments directed the National Marine Fisheries Service, as well as the regional fishery management councils, to make recommendations regarding federal or state agency activities that may affect the "essential fish habitat" (EFH) of a fishery under its authority. The Magnuson-Stevens Act amendments also mandate that threats to EFH be identified, and that conservation and enhancement measures be described to minimize those adverse impacts.

The proposed project has the potential to affect EFH for chinook and coho salmon as well as the following Council-managed groundfish and coastal pelagic species and their life history stages.

Groundfish Species	Egg	Larvae	Young Juvenile	Juvenile	Adult	Spawning
Spiny Dogfish			x	x	x	
Ratfish				x	x	
Lingcod		x		x	x	x
Cabezon		x				
Kelp Greenling		x				
Pacific Cod		x	x	x	x	x
Pacific Whiting (Hake)			x	x	x	
Sablefish		x	x	x	x	x
Jack Mackerel					x	
Darkblotched Rockfish				x	x	



Groundfish Species	Egg	Larvae	Young Juvenile	Juvenile	Adult	Spawning
Greenstriped Rockfish				x	x	
Thornyheads	x					
Pacific Ocean Pearch				x	x	
Widow Rockfish			x	x		
Misc. Rockfish				x	x	
Arrowtooth Flounder				x	x	
Butter Sole	x	x				
Curlfin Sole	x					
Dover Sole	x			x	x	
English Sole	x	x	x	x	x	x
Flathead Sole		x		x	x	x
Pacific Sanddab				x	x	
Petrals Sole			x	x	x	
Rex Sole	x	x		x	x	
Sand Sole	x	x				
Starry Flounder	x	x	x			x
Coastal Pelagic Species						
Northern Anchovy	x	x		x	x	
Pacific Sardine	x	x		x	x	
Pacific Mackerel	x	x		x	x	
Jack Mackerel					x	
Market Squid	?	?	?		x	?

COMMENTS AND RECOMMENDATIONS:

Our comments on the final environmental impact statement (FEIS) are as follows:

- Ocean Disposal Taskforce:** The Corps committed to forming a taskforce of agencies and stakeholders to develop a management plan for the ocean disposal sites and determine studies needed to monitor and manage the sites. It is unclear in the FEIS what authority the taskforce will have and when it will be formed.

Recommendation: An memorandum of understanding (MOU) to form the Ocean Disposal Taskforce needs to be developed and signed by all parties prior to final designation of the deepwater site. The Corps needs to commit to long-term funding of the taskforce. The Corps needs to give the taskforce clear and significant authority in determining how the sites are managed.



- 2. Monitoring and Baseline Data:** It is our understanding that the deep water site is large enough that there should be flexibility in the dumping location within the site to protect unique habitats and biologically productive areas. For example, anecdotal information from fishers indicates that the eastern portion of the deep-water site may concentrate English sole. If this can be confirmed, disposal activities in this area should be avoided.

Recommendation: We request that additional assessment of biological and physical characteristics of the proposed ocean dumpsites, especially the deep-water site, be undertaken. Baseline studies of the deep-water site are needed prior to beginning disposal there. For example, habitats should be characterized using side-scan sonar, multibeam bathymetry, and various groundtruthing techniques. In addition, benthic surveys and trawl studies should be conducted to determine biological characteristics.

We request that the Corps and the Ocean Disposal Taskforce design studies to gather this baseline information prior to disposal in the deep-water site. In addition, special studies and on-going monitoring are needed to monitor impacts to aquatic resources from disposal activities and to make timely adjustments to ocean disposal strategies if monitoring information indicates that adjustments are needed (for example, the Corps funded a preliminary study to examine burial impacts to Dungeness crab. A more thorough study is needed to fully document and understand potential burial impacts).

- 3. Dungeness Crab:** Fishermen and resource agencies have raised concerns about entrainment and killing of Dungeness crab during dredging activities (in addition to ocean disposal activities). Though not a Council-managed fish species, we are concerned about this valuable resource because it is one of the few healthy fisheries remaining off the Oregon and Washington Coasts.

Recommendation: We agree with the Washington Fish and Wildlife Department's suggestion that a clamshell dredge be used in estuarine areas (and elsewhere where feasible) to reduce entrainment of Dungeness crab.

- 4. Contaminants:** We are concerned that the channel deepening projects impact will result in increased exposure of salmonids and other fish to contaminants such as dioxins, furans, PCBs, and DDE. Specifically, dredging activities in shallower areas on either side of the channel aimed to reduce sloughing will disturb shallower depositional zones that contain finer sediments, which are often a major source of contaminants. If resuspended through dredging, these contaminants become bioavailable.

Recommendation: As was suggested in comments provided on the draft EIS by the U.S. Fish and Wildlife Service (dated February 8, 1999), we recommend the Corps add specific information or a preliminary ecological risk assessment to the FEIS to define conditions in the Columbia River that would either support or negate sediments as the source for transfer of bioaccumulative compounds.

- 5. Year Round Dredging:** We are concerned that the deepening project's planned year round dredging does not take fully into consideration the life history patterns of migrating fishes, especially salmonids.



Recommendation: We request that in-water work timing considerations be added to minimize impacts to Council-managed resources.

6. **Mitigation:** The project's mitigation package does not adequately address all biological impacts. For example, no compensatory mitigation has been proposed for ocean impacts. We understand that while there are existing policies and procedures for estuary mitigation, there is no real model available for ocean disposal mitigation.

Recommendation: The FEIS needs to include a mitigation package for estuary and ocean impacts. We recommend that the Corps commit to mitigation and form a group of agencies/stakeholders to determine the specifics of the package.

7. **Forage Fish:** We are concerned about project impacts to forage species, such as Pacific sand lance (*Ammodytes hexapterus*) and smelt (*Thaleichthys pacificus*). Smelt have been returning in low numbers in recent years.

Recommendation: We concur with past comments made by Washington Department of Fish and Wildlife (WDFW) that dredging around the mouth of Lewis and Sandy Rivers be limited to the use of clamshell dredging between January 1 and June 1. We also concur with NMFS and WDFW for time closures to protect juvenile smelt from the Sandy River to Cathlamet.

8. **Essential Fish Habitat:** We believe that the FEIS for the proposed channel deepening project needs to be revised to ensure that impacts to the essential fish habitat of the Columbia River, Columbia River estuary, and the marine ecosystems are minimized to the greatest extent possible.

Thank you for the opportunity to comment on this important matter.

Sincerely,



Jim Lone
Chairman

SHP:rdh

