

PACIFIC FISHERY MANAGEMENT COUNCIL

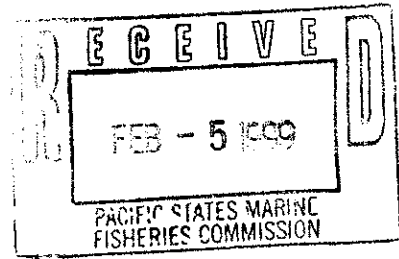
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February 4, 1999



Mr. Steven J. Stevens
U.S. Army Corps of Engineers
Portland District, CENWP-PE-E
PO Box 2946
Portland, OR 97208-2946

Dear Mr. Stevens:

We wish to comment on the *Draft Integrated Feasibility Report for Channel Improvements and Environmental Impact Statement (DEIS) (Columbia and Lower Willamette River Navigation Channel)*.

We have serious concerns about the location of the north and south disposal sites and the impact of dredged material disposal on the Dungeness crab resource and fish species managed by the Pacific Fishery Management Council (Council). The mouth of the Columbia River is an extremely productive area not only for crab, but also for salmon, groundfish species including flatfish, and numerous other species.

The Council was created by the Magnuson Fishery Conservation and Management Act in 1976 with the primary role of developing, monitoring, and revising fishery management plans for fisheries conducted within federal waters off Washington, Oregon, and California. Subsequent congressional amendments in 1986, 1990, and in 1996 added emphasis to the Council's role in fishery habitat protection. Amendments in 1996 directed the National Marine Fisheries Service (NMFS), 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 Fishery Conservation and Management Act's amendments also mandate that threats to EFH be identified, and conservation and enhancement measures be described that minimize those adverse impacts. The proposed disposal sites are located within EFH for salmon and groundfish as identified by the Council in fishery management plan amendments. The groundfish plan amendment has been adopted by the Council and submitted to the Secretary of Commerce for approval. The salmon plan amendment will be adopted by the Council in March 1999. We expect these amendments to be approved.

The ocean disposal alternative in the DEIS proposes to utilize two ocean sites (north and south) encompassing 81.3 square miles. Over 50 years, these sites would receive over 225 million cubic yards of material from the maintenance dredging at the mouth of the Columbia River, and if approved, the maintenance and construction of the 43-foot channel deepening project.

Regarding the impact of disposal in the north and south sites, the DEIS states:

No significant impact on other known uses of the ocean such as commercial and recreational fishing or navigation; actual or anticipated exploitation of living marine resources; actual or anticipated exploitation of nonliving resources, including sand and gravel or other mineral deposits, oil and gas explorations, or structural development, and scientific research are anticipated (DEIS Exhibit D, page 3).

The DEIS also states:

The proposed sites are located in the nearshore area and many pelagic organisms occur in the water column over these sites. These include zooplankton (copepods, euphausiids, pteropods, and chaetognaths) and meroplankton (fish, crab, and other invertebrate larvae). The organisms generally display seasonal changes in abundance since they are present over most of the coast, those from the mouth of the Columbia River are not critical to the overall coastal population. Based on evidence from previous zooplankton and larval fish studies, it appears there will be no impacts to organisms in the water column (Sullivan and Hancock*) (DEIS page 6-23).

(*Note: The above reference does not appear in the literature cited section of the DEIS.)

We believe the DEIS does not provide enough biological information on the disposal area to make the statements referenced above (DEIS Exhibit D, page 3; DEIS page 6-23), especially given the volume of material proposed for ocean disposal. Our concerns include:

1. Based on existing ecological information, there is reason to believe that ocean disposal off the mouth of the Columbia River will be in conflict with fisheries resources and the fishing industry, and have an adverse impact on EFH.
2. The area defined as the mud hole off Washington state has been described as a unique marine habitat with high biological productivity. This area is within the north site and should be avoided. In addition, the mouth of the Columbia River is a unique marine habitat, being an extremely productive flatfish nursery area.
3. The DEIS states on page 12, Appendix H, Volume I, that from July 1997 through August 1998 the U.S. Army Corps of Engineers (Corps) convened a series of workshops, which included fishing groups and natural resource agencies, to identify new offshore disposal options (e.g., management of erosion along the Washington coast, including Benson Beach) for the Columbia River navigation projects. However, according to the Washington Department of Fish and Wildlife and Oregon Department of Fish and Wildlife (ODFW), agreements reached in that process to date are not reflected in the DEIS. It is also our understanding that the Corps is obligated to seek beneficial uses for dredged material first, and exhaust all of those uses before disposal is considered. We encourage the Corps to continue to work on reducing impacts to fisheries resources by exploring dredge disposal site alternatives such as beach renourishment.
4. Disposal of dredged material will alter the benthic-epibenthic community structure by changing sediment characteristics. This will affect benthic prey organisms and the fish and crab that depend on them. Further analysis is also requested to validate the statement "Since (meroplankton and zooplankton) are present over most of the West

Coast, those from the mouth of the Columbia River are not critical to the overall coastal population." Coastal distribution of a species does not preclude the destruction of a local population from having an impact on the population as a whole. Source populations for the species potentially impacted by the dredging process should be investigated and identified. In addition, river mouths, mixing zones, and estuaries are thought to be areas of especially high biological productivity. Hence, meroplankton and zooplankton populations distributed along the West Coast may not make equal contributions to productivity, biodiversity, or the maintenance of ecological processes.

5. The Corps discusses the thin layer dredge spoil disposal method as an option. The Corps assumes that impacts from this method would reduce impacts to crab resources (i.e., fewer burial mortalities). However, no field testing has been conducted off the mouth of the Columbia River to determine if dredges are capable of delivering the disposal material with such precision that the resulting dump mound is below the lethal limit for crabs. According to ODFW, "Given the lack of supporting evidence for appropriate management of thin layer disposal off Oregon, the lack of a specific management plan, the expected impacts of dredge material disposal on marine habitats, marine resources and economic potentials, plus the huge areal extent of the north and south sites, ODFW is convinced that thin-layer disposal methods are not compatible with the marine environment off Oregon and should not be employed by the Corps."
6. We are concerned with the deepening and incremental maintenance dredging of the estuarine portion of the project. Dredging activities kill Dungeness crab which can be found in estuarine areas. We recommend the Corps Portland district office develop a strategy similar to the one developed for Grays Harbor, Washington which outlines in detail the methods for avoiding, minimizing, calculating, and mitigating crab impacts.

The Council has not developed a formal position with regard to the proposed channel deepening project. We realize that dredging and disposal of dredge spoils are a necessary part of keeping the Columbia River a functioning economic arterial; however, the Council opposes the north and south disposal site based on the following:

1. Unprecedented size of the proposed ocean disposal sites.
2. The known resources that will be impacted (crab, juvenile flatfish, etc. Note: the importance of Dungeness crab larval stages, particularly megalopae, as forage for many groundfish species as well as chinook and coho salmon is well documented).
3. Impacts to the crab fishery. (Note: Although the Council does not directly manage the crab fishery, most crab fishermen also participate in Council-managed fisheries, and any impact to the crab fishery will have implications in other fisheries.)
4. Uncertainties about impacts of thin-layer disposal.

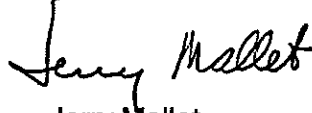
In addition, we request that, before the deepening project proceeds further, any ocean disposal alternative be revised to include sufficient biological information on the impact of dredge material on fish and shellfish resources and their EFH. This information should also be collected for ocean disposal activities of ongoing dredge disposal activities at the mouth of the Columbia River. Once those impacts have been more fully identified and evaluated, appropriate steps can be explored with input from resource agencies and the fishing industry

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to minimize impacts and mitigate unavoidable impacts from ocean disposal activities. Also, we recommend that any future consideration of ocean disposal include a comprehensive monitoring plan. This should be accomplished in cooperation with the fishing industry.

We look forward to working with you in this important process. Please feel free to contact the Council staff at (503) 326-6352.

Sincerely,



Jerry Mallet
Chairman

SHP:klr

bc: Mr. Dale Beasley
CREST
Council Members
Habitat Steering Group