

Lt. General Joe Ballard
Commander
U.S. Army Corps of Engineers
20 Massachusetts Avenue NW, Room 8228
Washington, D.C. 20314-1000

Re: Comments on the Final Environmental Impact Statement for Columbia River Channel Deepening Project

Dear General Ballard:

I am the Executive Officer of Metro Regional Services, the regional planning government in the three-county region surrounding Portland, Oregon. Metro is responsible for solid waste, transportation, and growth management planning in the urbanized portion of this area. I am writing to you because I have concerns about several critical issues related to the channel deepening project that affect our efforts to improve watershed health in the Metro Region.

First, the project proposal calls for continuous dredging for at least 2 years. As you are aware, current operation and maintenance (O&M) dredging occurs during certain times of the year so as to minimize the affects of turbidity and entrainment on salmonids. I am concerned that the deepening project assumes minimal affects because the work occurs in the deeper portion of the channel and will not affect fish. This assumption fails to account for the long term negative affects of turbidity and turbidity plumes on fish migration channels in or near the navigation channel.

Second, the project proposal not only includes the deepening from 40 to 43 feet, but 5 feet of overdredge; the total dredge will be 8 feet. The result of this action is that the saltwater "wedge" will move up the mainstem Columbia at least one mile. It will also move further up the lower river areas of tributaries. This salinity change will have significant affects on the ecology of the lower Columbia, and these affects have not been effectively analyzed in my opinion.

Third, there are areas of contaminated sediments within the lower Columbia River that will likely be affected by the deepening project. The affects of disturbing these sediments on salmonids and the food web in general have not been effectively described. Scientific literature is increasingly able to describe the adverse affects of exposure to toxic chemicals and suspended sediments on salmonids and their ability to home to their natal streams, to properly develop their sexual organs, and successfully migrate as juveniles.

The reason that Metro and I are concerned about these issues and the affects on salmonids is that we are taking strong action to protect and restore salmonids and watershed health in our region. To accomplish this, we are in the midst of not only asking, but also requiring that private property owners, businesses, local governments, and private individuals within the Metro Region give up some of the "sticks" in their "bundle of property rights." In order to protect important stream areas, and begin the long process of watershed and salmon recovery, Metro, in partnership with 24 cities and 3 counties, is putting in place conservation programs that will require sacrifices by public and private entities. If we are successful, we will improve conditions for salmonids in our region.

However, it is my belief that our efforts will be for naught if the increased abundance of juvenile salmonids must enter and survive in an increasingly hostile estuary. The critical importance of the Columbia River estuary for salmonids is a fact. It is an unknown whether this project has no net affect, and it clearly does nothing to improve conditions for migrating salmonids.

This concerns me as I try to steer our region towards improving watershed health for a host of economic, cultural, recreational, and community reasons. All jurisdictions with authority for managing our shared natural resources need to act in a consistent manner if we are to achieve the goals of watershed health and for recovery under the Endangered Species Act.

Conclusion?

Sincerely,

Mike Burton
Metro Executive Officer

Cc: Will Stelle, NMFS
Governor John Kitzhaber, MD
Governor Gary Locke
Mike Thorne, Port of Portland
Rod Monroe, Metro Presiding Officer
Lou Ogden, Chair, MPAC