

Appendix H
Draft Feasibility Report/Environmental Assessment
Review Comments/Letters

Draft Feasibility Report/Environmental Assessment Comments and Responses

The Draft Integrated Feasibility Report/Environmental Assessment for the Oaks Bottom Section 206 Habitat Restoration Project Feasibility Study was circulated for a 30-day public and agency review on July 14, 2015. The comment period ended August 14, 2015. During the comment period, two comment letters were received; one from the Oregon Yacht Club and one from the Surfrider Foundation. This appendix to the Final Integrated Feasibility Report/Environmental Assessment contains a copy of the two comment letters received.



August 3, 2015

District Engineer
U.S. Army Corps of Engineers, Portland District
Attn: CENWP-PM-E/Patti Clinton
P.O. Box 2946, Portland, Oregon 97208-2946

RE: CENWP-PM-E-15-4 Oaks Bottom Tidal Restoration Project Draft Feasibility Report
Oregon Yacht Club –Adjacent Neighbor Public Comment

We are providing these comments based as the nearest waterfront neighbor to the proposed project, and the location most likely to be impacted by both short term and long term discharge from the project. The Oregon Yacht Club (OYC) supports the overall goals of the project, habitat restoration and clean-up of the site to ensure future clean water in the river and healthy green spaces and desire to be a cooperative partner in the future.

OYC recently completed an extensive maintenance dredging project that included the requirement of a clean sand capping due to presence of DDT in some test samples nearest the proposed project. The sand cap requirement was included by the COE to insure the new surface after dredging was free of any DDT that could be a potential exposure pathway to ESA and other benthic species and cost the moorage over \$100,000 in additional expense.

We understand this project is will only remove contaminated soil within the required foot print and one goal of the project is to reduce the future potential for export of contaminants to the river. We also understand only some of the excavated soil is approved for unconfined in-water, however none will be placed in-water and will all be removed and disposed in an approved off-site location.

The New Surface Material (NSM) in some of the areas may have potential exposure risk unless covered with a suitable cap. While it appears the work is limited to the lower risk areas identified in the 2011 PRG review document and an imported stream bed cobble and other materials will be placed over the NSM some risk of future exposure does exist. Increase of tidal flow within the basin is also a goal, thus elevated risk of contaminate mobilization does exist. Per the public review documents available, the City will monitor the outfall adjacent to OYC for flow rate and velocities, however it is not clear if monitoring of cumulative sediment transport and contaminant transport exiting the culvert is planned. As our facilities are immediately adjacent to this outfall, we are requesting that additional monitoring and assurances that contamination and sediment will not impact our facility.

We are also requesting additional information regarding construction BMP's, turbidity monitoring protocol and water bypass strategy as it relates to culvert replacement and work within the basin to provide OYC with reasonable certainty no releases of turbidity or contaminated water will reach our site due to the multi-directional tidally influenced flow within Holgate Channel. Typical BMP's listed may or may not be effective, and strategy for treatment of pumping/discharge of contaminated water is not clear in the design documents, with a reference to pumped water from cofferdam "infiltration in to dense vegetation adjacent to work area may be allowed as directed" (Sheet G04 90% Engineering Plan).

Based on observation of the project area by community members, carp and waterfowl cause major sediment disturbance potentially causing the release DDT contained in the sediment. The suspended sediment can easily leave the project area through the culvert and move up or down stream from the site. As the project purpose includes introduction of daily tidal flow and flushing to the basin, we are concerned suspended sediment from the basin could migrate upstream and settle over our clean cap.

The flow in Holgate Channel, the receiving body from the project, is rather complex and varies with both river discharge and river stage, however our community members do see water moving upstream under certain conditions. When a tidal connection is established by the project flow from the basin will move downstream and upstream over our site. The BA discusses secondary impacts mainly downstream, however does not mention these secondary impacts upstream to OYC. We request additional information regarding how this concern will be addressed.

As we read the available information and become more familiar with it, we may have additional concerns and request to be engaged as an affected party in future permitting progress for this project. Correspondence and progress updates should be sent to the address below.

Thank you.



Sally Anderson, Commodore
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August 12, 2015

District Engineer
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Public Notice: CENWP-PM-E-15-4
Issue Date: July 14, 2015
Expiration Date: August 12, 2015

Re: Comments on Draft Report and Environmental Assessment for Oaks Bottom

The Surfrider Foundation Portland Chapter is writing to express our strong support for the proposed Oaks Bottom Habitat Restoration Project. Our members and volunteers greatly value the Oaks Bottom area and we endorse the project's goal to restore ecological function to the wildlife refuge and broader region. Improving the flow of Willamette River water in and out of the refuge will provide important benefits to juvenile salmon, bird species, and many other animals.

The Surfrider Portland Chapter is deeply invested in efforts to restore the Oaks Bottom Wildlife Refuge. Over the past eight years, we have partnered with Portland Parks and Recreation Department and other local groups to conduct nearly twenty volunteer restoration events in the refuge. Through these efforts, we have planted thousands of native plants, removed vast tracts of invasive species (especially English Ivy), installed fences to keep dogs out of sensitive areas, and removed large amounts of trash.

The Surfrider Portland Chapter recognizes that the Oaks Bottom Habitat Restoration project will build upon many years of such community collaboration. We look forward to supporting the successful implementation of the project however we can.

The Surfrider Foundation is a grassroots environmental organization dedicated to the protection and enjoyment of the world's ocean, waves, and beaches. Our Portland Chapter works to protect and restore the watersheds of Portland and the North Coast through education, advocacy, and volunteer stewardship.

Thank you for the opportunity to submit comments,

Kirsten Bracht
Portland Chapter Chair
Surfrider Foundation

Pete Stauffer
Environmental Director
Surfrider Foundation