



Vanalco, Inc.
5701 NW Lower River Road
P.O. Box 9905
Vancouver, Washington 98605-9905
Telephone: (360) 858-8881
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February 4, 1999

U.S. Army Corps of Engineers, Portland District
CENWP-PE-E
P.O. Box 2946
Portland, OR 97208-2946

Attention: Steve J. Stevens

RE: October 1998 Draft Integrated Feasibility Report for Channel Improvements and
Environmental Impact Statement

Please accept the following comments regarding the draft Environmental Impact Statement
referenced above. On page 5 of Appendix E-HTRW Preliminary Assessment Screening in
Section C.2.:

- Release Number 3856 is not located on Vanalco property.
- Crowley Marine is not a lessee on Vanalco property.

Sincerely,

L. W. McLellan
EHS Manager

LWM/do

cc: Ms. Ellen C. Dial - Perkins Coie
Mr. Charles D. Reali - Vanalco

Corps of Engineers Response

Thank you for this corrected information.

COLUMBIA RIVER PILOTS

13228 N. LOMBARD
PORTLAND, OREGON 97203
503-288-8988
FAX 503-288-8988

February 3, 1999

U.S. Army Corps of Engineers,
Portland District
Attention: Steven J. Stevens
CENWP-PE-E
P. O. Box 2946
Portland, OR 97208-2946

Corps of Engineers Response

Re: Non-Structural Alternative to Channel
Deepening Project

Dear Army Corps of Engineers:

The October 1998 Public Review Draft of the Columbia River Channel Improvement Study at pages 4-4 and 4-5 discuss what is termed a "non-structural alternative" to the channel deepening project. This non-structural alternative is simply an enhancement of the river forecasting system known as "Loadmax". There is also a discussion of improving and expanding the Loadmax system in chapter 4 of Appendix A to the Integrated Feasibility Report for Channel Improvements and Environmental Impact Statement dated October, 1998. The purpose of this letter is to object to consideration of Loadmax enhancements as an alternative to channel deepening.

The supposed value of the non-structural alternative seems to arise from an apparent misunderstanding of current circumstances. The misunderstanding crops up in various places, but is best summarized in the following statement by the ACOE:

Thank you for your comments concerning LoadMax. Please see our response #2 to the Department of Interior letter regarding LoadMax. We have updated the report to reflect this information.

U.S. Army Corps of Engineers, Portland District
 February 2, 1999
 Page 2

" [W]ater depths available were not consistently being fully utilized. Ships are routinely limited to the predetermined target drafts listed in Chapter 1. However, Figures 4, 5 and 6 show that both bulk carriers and container ships sailing at their respective target drafts commonly had underkeel clearances that ranged from 1-ft less to 4-ft greater than the minimum acceptable clearances. Bulk carriers occasionally may touch bottom on shoals with bed elevations above 40 ft CRD project depth. This does not seem to be a serious problem, but is a safety concern. The range of underkeel clearance indicates there are opportunities to increase both draft and safety for the deepest draft transits on the Columbia River. "

We take exception with the assertion that contact with the bottom is not a serious concern. We suspect the United States Coast Guard would also, as would the Oregon Board of Maritime Pilots, the B.C./States Oil Spill Task Force, the Washington State Office of Marine Safety and most any other agency or entity that concerns itself with maritime safety. The reasons are obvious. Contact with the bottom can very easily result in serious damage. Contact with a hard structure on the bottom will open the hull of a ship like a can opener. And the concern has grown progressively more intense over the last ten years, as public awareness of maritime safety issues has grown.

Even a soft bottom is to be avoided. Grounding on a falling tide will at the very least create a hazard to navigation and can cause structural damage to the ship if the weight of the ship comes to bear unevenly as the tide subsides. of more frequent concern are the ill effects on the handling of a vessel from contact with the bottom. Even light contact with a soft bottom by a vessel underway can cause extreme difficulty maintaining control, with such occurrences increasing the likelihood of a ship veering out of the channel or into oncoming traffic.

Loss of vessel control becomes much more likely as underkeel clearance diminishes, even if contact with the bottom is not made. This seems to be the result of increased squat, which is felt by the pilot as suction on the bottom of the ship, to which a ship sometimes reacts

U.S. Army Corps of Engineers, Portland District
 February 2, 1999
 Page 3

unevenly by shearing off in one direction or the other. And, squat increases almost geometrically as underkeel clearance diminishes, so that, for example, a loss of one measure of underkeel clearance may result in squat increasing threefold or fourfold. The ill effects of this are compounded when a vessel with diminished underkeel clearance traverses an area of shoaling--the increased squat from deeper loading may not be a problem in most areas but the squat becomes suddenly pronounced in areas of shoaling, causing serious handling problems or sometimes causing the vessel to drop down until contact with the bottom is made.

One point that is not discussed in the ACOE materials is that deeply laden ships are often allowed to cross the bar at Astoria only at high tide. Timing to achieve highwater bar crossings is necessary to avoid grounding on the bar as the ship rides up and down on the ocean swell. In order to arrive at Astoria just before highwater, an outbound vessel must depart Portland or Vancouver at lowwater or within a couple of hours of lowwater at the upriver location. Then, the outbound ship will actually traverse a second lowwater period somewhere between Wauna and Longview. One cannot simply leave Portland at high water and ride the highwater crest outbound--a vessel cannot keep up with the fall of the tide. A departure at highwater in Portland will result in arriving at lowwater in Astoria, requiring the vessel to anchor, which is itself ill-advised and dangerous given the grossly inadequate anchorage in Astoria. The fact that outbound, deep ships must contend with at least one and sometimes two periods of low water compounds the difficulty in planning for safe transits. And, all transit planning must encompass the entire transit from Portland/Vancouver to the open ocean, it cannot just look at the Portland/Vancouver to Astoria segment.

In section 4.4 of Appendix A, the Engineering Appendix, the discussion focuses on enhancing Loadmax by including not just water volume information, but channel bottom information, so that estimated underkeel clearance projections could be made. "The controlling shoal elevations for each reach of the channel would come from the Corps of Engineer's hydrographic surveys and can be updated at approximately three-month intervals. " These comments reflect a misunderstanding of the hazards that shoaling presents, as described above, as well as the way pilots currently deal with information about the occurrence of shoaling.

The river bottom changes daily, some days more than others, but constantly. To suggest that a snapshot of

U.S. Army Corps of Engineers, Portland District
 February 2, 1999
 Page 4

the bottom be put into Loadmax and then relied upon for a period of three months for critical, zero clearance transit planning until another snapshot is taken three months later is to invite disaster. Currently, pilots utilize ACOE surveys and charts, but base their decisions on almost daily reports from other pilots about areas of known or suspected shoaling and how other vessels are handling in such area. That kind of information is critical, as it is almost real-time feedback about channel dynamics. In fact, it is the pilots who most often notify the ACOE of the discovery of shoals, sand waves and other such transient but potentially dangerous bottom features. A snapshot every three months would give a very misleading picture of what a vessel is likely to encounter.

The ACOE discussion also notes that: "Container ships that have design drafts of 38-to-41 feet are currently targeting a draft of only 36-feet. The container lines are concerned about the reliability of service, therefore they schedule only enough outbound cargo to be at the docks to load to a predetermined draft." The discussion goes on to suggest that expanding Loadmax would allow container ships to load deeper. Maybe, but we suspect not, as safety and certainty are extremely important in container service, and the proposed enhancements to Loadmax cannot guarantee either.

The container lines have generally set a target draft of 36 feet on their own. Pilots did not establish that as a draft limitation and are generally willing to transit at drafts from 38 to 40 feet, depending on the circumstances. The container lines must have absolute certainty that loading to a particular draft will not result in delay, either because water levels at the time of sailing are not as previously forecast, or because shoaling has been discovered downriver, or because that vessel grounds unexpectedly outbound and is either hung up or must delay while reporting to authorities. The 36 foot target drafts were not set arbitrarily. Rather, they were adopted in response to the actual experiences of container vessels that loaded to deeper drafts. We suspect that the container lines would not change their practices in response to Loadmax enhancements, because those enhancements cannot eliminate the uncertainties that must be avoided. These lines have adopted policies about minimum underkeel clearances, and they are not likely to cut those minimums in response to more information.

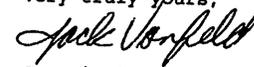
We note that certain inadequacies in the current forecasts cannot be improved upon by the proposed Loadmax

U.S. Army Corps of Engineers, Portland District
 February 2, 1999
 Page 5

enhancements. Water release information from Bonneville Dam is not now considered accurate beyond one, two, three days, nor are such projections of the effects on river levels of rain in the lower third of the Columbia basin. Those sources of error will remain and are significant. Given the inherent error in forecasts, and the potential adverse financial and environmental consequences of being over optimistic, it is only prudent to err on the side of caution when planning vessel transits.

Finally, we do not intend by our comments to suggest that Loadmax is not useful. It is useful. While we sometimes observe that its forecasts are inaccurate, we take such inevitable inaccuracies into account in how we use Loadmax. We will use any information that is available, and if Loadmax can be made more reliable, so much the better. But we very much disagree with the notion that Loadmax enhancements can be considered a substitute for channel deepening. We believe the margin of safety has been reduced to zero in many cases, and any attempt to reduce underkeel clearances further, which appears to be the goal of the Loadmax enhancement alternative, would be a serious mistake.

Very truly yours,



Captain Jack Vonfeld
 President

CC: Port of Portland
 Port of Longview
 Port of Kalama
 Columbia River Steamship Operators Assn.
 Columbia River Channel Coalition

City of St. Helens
P.O. BOX 278 PHONE (503) 397-6272
St. Helens, Oregon
97051

November 18, 1998

U.S. Army Corps of Engineers, Portland District
CENWP-PE-E ATTN: Steven J. Stevens
P.O. Box 2946
Portland, OR 97208-2946

Corps of Engineers Response

Dear Mr. Stevens:

The City of St. Helens appreciates the opportunity to review the Draft Integrated Feasibility Report for Channel Improvements and Environmental Impact Statement for the Columbia and Lower Willamette River Federal Navigation Channel.

Comments noted.

The City fully supports the use of Sand Island, at River Mile 86.2 as a disposal site for dredged materials. The City, with the help of the Oregon State Marine Board, has made over \$1 million in recreational improvements to the Island. These include transient boat docks, restrooms, picnic and camping facilities. The adopted Conservation Resource Management Plan for the Island lists beach nourishment as the least cost option for protecting the investments on the Island.

The City would also like to suggest another site for disposal. Just north of the City limits is a parcel of publicly owned land that has frontage along the Columbia River. It is located at approximately River Mile 85 and is an ideal beach site. It is close to the channel dredging work site and could have broad positive recreational impacts. We urge you to look at this site also.

Thank you for the opportunity to comment on this project.

Sincerely yours,


Donald L. Kallberg
Mayor

Paul Vik
152 East Sunny Sands Rd.
Cathlamet WA 98612

(360) 849-4109

January 20, 1998

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

Corps of Engineers Response

Dear Mr. Stevens:

Please consider some thoughts herein submitted which I wish to have appended to my verbal remarks at the workshop in Kelso on December 19, 1998.

At that time I described the action of ship wakes in the mouth of the slough on the upriver end of Puget Island meeting the river between disposal sites 43.8 and 45.0 and the resultant erosion of the downstream end of the "the sand bar," the island on which is located disposal site 45.0.

Erosion caused by ship wakes has been mentioned at Environmental Roundtable meetings, in one-on-one discussions, and in written comments. Standard Corps response is that wind waves, current and tidal action are causing erosion and, while the ships wakes contribute to the problem, they are not the main event.

Wind waves do not push a surge ahead of themselves causing rapid fluctuations of water level as does the passing of a ship. The surge that precedes a ship has been used to raise the water level to assist in freeing stranded vessels by deliberately steaming a ship at full power as it approaches the scene of the stranding. (Ask the pilots about this). The effect of that surge upon shallow water is what I described December 19th.

Also, there were 705 tide cycles in 1998. In the backwater sloughs, as at the upper end of Puget Island, these cause current reversals regardless of river level. $705 \text{ cycles} \times 2 \text{ directions per cycle} = 1,410 \text{ current changes}$.

There are 2,000 ships calls per year above Puget island, resulting in 4,000 wake events per year. A typical wake event causes the water to rise, lower, rise, lower, then return to normal level. In shallow slough mouths this combines with

Comments noted. See the discussion of shipwake erosion in Section 6.2.3 of the EIS.

swells to result in violent action. Tidal fluctuations result in gentle buildup of flow in shallow sloughs and do not muddy the water as do ship wakes.

In my verbal remarks I recall stating that 4,000 ship transits per year average a wake event every 2 hours and 11 minutes. 705 tide cycles per year x 2 results in a current change every 6 hours and 13 minutes on the average.

Thank you,

A handwritten signature in cursive script that reads "Paul Vik".

Paul Vik
Puget Island resident

Paul Vik
152 East Sunny Sands Rd.
Cathlamet WA 98612(360) 849-4109

February 1, 1999

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

Corps of Engineers Response

Dear Mr. Stevens:

Regarding verbal comments by Mr. Richard Gustafson of Astoria at your workshop meeting in Astoria on November 12, 1998, concerning your estimates of transportation from Portland to Astoria, his point is well taken.

It appears to me that what you have done is assumed that freight would be "load-centered" in Portland and then shuttled to Astoria. In other words, the bills of lading would originate in Portland. For that kind of operation I will accept your estimates. However, grain in shipload quantities travels by unit train, and assuming improvements to the railroad, the difference in rates for a consist originating in Nebraska between termination in Portland or termination in Astoria isn't going to be much. (I have some long-haul trucking experience and in understand this). You also need to consider barges loaded in, say, Central Ferry, Clarkston, Port Kelly, etc., on to Astoria, deducting rates for similar tows terminating in Portland.

The same procedure should also be applied to containers. Pick an inland terminal and compare the difference. Also, be aware that trucks northbound on I-5 south of Portland use US 26 if their destination is Astoria. Assume you are in Eugene and want to take the short route to Astoria. Look at a state highway map and see what you would do.

Regarding barging costs, the Wauna pulp mill has been barging product to Portland for over 30 years. I realize they are consolidating shipments with Camas and West Linn which ports ships cannot reach so their situation is somewhat special. However, if barging is so expensive, I would think Crown Zellerbach would have originally located all their mills where ocean-going vessels could terminate. Crown Z also towed logs from Blind Slough and Cathlamet to Camas and then barged the products back to Portland for thirty years or more. Remember the sternwheeler Jean which was build to do just that? And the diesel boats George Birnie and Western Star, which operated long after the Jean was retired after 20 years of service in 1957? Camas pulps were towed from Cathlamet for several years after Wauna began operation, ending with hostile takeover and subsequent breakup of Crown Zellerbach in the mid 1980's.

I do not trust your figures regarding transportation costs to a regional port at the coast.

Thank you,

Paul Vik
Puget Island Resident

Comments noted. The regional port analysis has been revised to reflect more accurate costs.

Stevens, Steven J NWP

From: john boyle [SMTP:jsse@pacifier.com]
Sent: Tuesday, February 02, 1999 12:34 PM
To: Steven.; J.; Stevens@usace.army.mil
Subject: Channel Deeping Project

District Engineer,
US Corp of Engineers,
CENWP-EC-E,
PO Box 2946, Portland, OR> 97208-2946,
Attn: Steven Stevens

Corps of Engineers Response

1. I submit my comments to the proposed channel deeping project regarding the preceived damage to my interest in real property which I own on Puget Island. My place is at 193 East Sunny Sands. It lies outside the dike road. Inside the dike road, directly behind my house and a number of other residences, is a proposed New Site for the dredge spoils. On your map the site is identified as: Puget Is. (Vik) W-44.0, 100 Acres. I believe more suitable sites are available for your use which will not inflict damage to my property.

2. The damage to me will be from the sand of the spoil which will become air borne, blow from the site across the road and will infiltrate my house, deck, and yard. It will do the same to my neighbors property also. While it may seem to be an insignifigant concern to the planners, it is very important to me. The late spring, summer, and fall wind patterns are such that heavy winds, especially the afternoon period, tend to blow up stream, and across the body of the island. At our house, we do open the windows and doors to cool and ventilate on the hot days—they are in the direct path of any airborne particles. Should this seem to be an insignifigant concern, I suggest that any conversation with residents on lower island would find complaints about the amount of sand which infiltrates and requires excessive cleaning efforts, and buttoned up conditions on the windward, view sides, of their houses. Further, should you visit the upstream tip of the island and stand on an unsheltered area, the airborne sand would soon make things uncomfortable as it strikes you.

3. Since the spoil area is for the long term, we would be required to look out over a Gobi type, desolate looking area, void of greenery. The greenery is one of the pleasing things for the island people and visitors to view, we certainly enjoy what we now have, and we do not want to lose it to a convient sand pile for the Corp. Looks like we are now becoming an endangered species with this proposed plan.

4. I'm sure that the logic of depositing all the spoils from this stretch of the river on the Oregon side of the channel should carry some weight to the planners. Many good reasons, other than my complaint, can and probably have been advanced. We aren't wildlife, just taxpayers and voters, so we should be listened to, and have equal or better consideration than wildlife or corporate interests.

5. Another thing is the problem of shoreline erosion which is a big concern of the waterfront residents. The erosion that has been observed in recent years is awesome. On our stretch there has been some 20'to 30'feet of bank lost. Your plan must contain provisions to refurbish this shoreline at intervals, which it does not now intend to do. The amount, size, and speed of ship traffic is what your plan intends to facilitate. These require a suitable protection for the land owners which it does not now do. You must see and feel this as an obligation that a final plan addresses.

Respectfully,

John S. Boyle
13655 SW 21st St. Beaverton, OR. 97008 and
193 E. Sunny Sands, Puget Island, Cathlamet, Washington

1. Comments noted. This stretch of the river is one of our most problematic reaches of the navigation channel. It is a difficult reach to maintain. It is necessary to obtain a large upland disposal site in this area. We have evaluated many different upland disposal sites, as discussed in Chapter 4 of the EIS. Site W-44.0 was found to be cost effective and environmentally acceptable for use as a disposal site.

2. The impact of airborne particles could be evaluated on a site-by-site basis, and stabilization measures implemented as needed.

3. There is likely to be a visual impact from the new disposal site. The disposal would look similar to the barren sandy beaches common in the area.

4. Oregon sites were considered, but those sites either did not have sufficient capacity or had equal or greater impacts than the proposed Puget Island site (W-44.0).

5. Sandy beaches are easily eroded and the deeper channel should not cause a measurable increase in erosion. This issue is addressed in the EIS in sections 5.1.5.3 and 6.2.3.1.

**RND Development
109 Kalama River Road
Kalama, WA 98625**

January 28, 1999

Robert T. Slusar
Colonel, Corps of Engineers
District Engineer
Department of the Army
Portland District, Corps of Engineers
P.O. Box 2946
Portland, OR 97208-2946

Corps of Engineers Response

Re: Columbia and Lower Willamette Rivers Integrated Feasibility Report and Environmental Impact Statement

Dear Colonel Slusar:

Per your letter dated November 25, 1998 on the extension of the review period for the Columbia and Lower Willamette Rivers Integrated Feasibility Report and Environmental Impact Statement, please accept our following comments and request for consideration:

1.

We believe the deepening (dredging) of the Columbia River as proposed is basically an excellent project. There have been several plans proposed, incorporating a variety of combinations on how to "make it work". We realize many hours have been spent by the USA Corps of Engineers, and others, in preparation, review, and alteration of every aspect of the deepening plan. We have spent considerable time reviewing the documents prepared by the USA Corps of Engineers, and others, and would appreciate your consideration of our following comments:

In Water Disposal

2.

- In water disposal of the dredge spoils may have a negative affect on beach nourishment and, in our opinion, is a "loser" from most standpoints, economics being at the top of the list.
- In water disposal postpones the financing to some hopefully future date.
- The mineral leaching process of river currents exists from the very sources of the river to the ocean depths, thus an every increasing deposit in proportion to the distance to the ocean from the source of leaching.

1. Comments noted.

2. In-water disposal provides an economic disposal option where suitable sites are available and/or where no upland sites are available.

Corps of Engineers Response

With the ever shifting of the pervasive shoals, the most economical disposal, in our opinion, is upland disposal. Upland disposal would avoid re-handling and would be a one-time expense. Presently much of the maintenance dredging involves re-handling the dredge spoils at least once and some of it numerous times. This is per past and present practices of in-water disposal.

3. Comments noted. Upland disposal is most economical when the disposal site is located in the immediate vicinity of the dredging area.

3.

Upland Disposal

- Upland disposal provides property enhancement for a number of uses, including agriculture, residential, commercial, and industrial.
- Any of these uses contribute to the local economy greatly. Surely, as a whole, the Columbia River deepening (dredging) project is solely for the National economy.

Thus, environmental concerns appear pale in comparison to the National and local economic benefits of upland disposal.

Consideration

Please consider 1 square mile on each side of the hundred mile length of the deepening (dredging) project, plus the area at the cities on Oregon's riverfront total nearly 700 square miles. This is less than 1% of the total area of Oregon. Also 25% of Oregon's population is in the Columbia Riverfront cities. Washington's Columbia Riverfront population is 0.033% of Washington's population.

4. Comments noted.

4.

Further, the balance of Oregon's population equals 20 persons per square mile on more than 99% of the total land. Most of these are inland cities. The population per square mile ratios for Washington state are approximately 45 persons per square mile.

There is a great need for commercial/industrial property in close proximity to the 100 plus river miles, particularly in areas in the vicinity of ports engaged in ocean shipping. Due to the most feasible locations for ship channeling, river bank and land types, much of the riverfront land will most likely remain pristine, except for housing development. This is probably more true of the Washington coast due to lack or need of port cities, our steep terrain, high banks, and soil types.

The town of Kalama, Washington, situated mainly on a half-mile wide strip of land between the river and steep hills is one of seven meaningful ports on this 100 mile stretch of the Columbia River. Kalama has a real need for flat land to accommodate the ever increasing need for industrial expansion.

Colonel Slusar
USA COE
January 28, 1999
Page 3

Corps of Engineers Response

R.N.D.'s 142 acres lies approximately 300 feet east of the Kalama Port facilities (identified on the deepening study map, Reach 3, and designated as W.72.2). An over pass spanning I-5 and the Burlington Railroad connects the areas of R.N.D. and the Kalama Port Facilities.

We (R.N.D.) desire this property to be used for river dredge spoil disposal to any maximum height consistent with statutes and other practices. This property borders I-5 on the west nearly 4,000 feet, much of it hidden from view by Cottonwood trees. Old Highway 99 is the east boundary. Even though Appendix G (Page 59 Paragraph 2) indicates sites eliminated from further consideration as the most costly, the manager for the Port of Portland, in regard to dredge pipe filling, has labeled our property as "do-able". Appendix G does not give the HEP analysis for our site, and there has not been a recent wetland delineation and/or site assessment performed on our property to determine its current environmental status and what the impacts would be should our property be used for dredge spoil. Your feasibility study has placed a greater emphasis on upland disposal and we believe the majority of our site, even though it has never been used as a dredge disposal site, is well suited for dredge spoil disposal. Other mining sites in the area have served as disposal sites successfully and while a portion of our site is wetland, we also have some upland areas within our property boundaries.

We believe upland disposal sites should be preferred over in water disposal for this project, and others, for environmental and economic reasons. The current conditions of our property would provide minimal impact to existing wildlife and mitigation for emergent wetland impacts that would occur on our site during dredge disposal could be accomplished within the same drainage as our site, possibly at Kress Lake, directly east of our property. Kress Lake is managed by WDFW for fish and wildlife habitat. The higher quality wetland and habitat area referred to by your agency in the southern part of our site could be exempt from impact.

We would appreciate your re-consideration of our 142 acres as an upland dredge spoil disposal site for the Columbia River deepening project and for maintenance. We would appreciate meeting with you at any time. Thank you. We look forward to hearing from you.

Sincerely,


A.A. (Spike) Maras
RND Development
115 S Baker St.
Centralia, WA 98531


Lloyd Nelson
RND Development
109 Kalama River Rd.
Kalama, WA 98625

AAM:kmc
CC: Interested Parties

5. The RND property will not receive further consideration as a disposal site because of cost and mitigation considerations for wetlands impacts.

CC:

Evan Lewis
USA Corps of Engineers
Regulatory Branch
P.O. Box 3755
Seattle, WA 98124-2255

Laura Hicks
USA Corps of Engineers
P.O. Box 296
Portland, OR 97208-2946

Ron Musser
USA Corps of Engineers
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USA Corps of Engineers
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Portland, OR 97208-2946

Karl Eriksen
USA Corps of Engineers
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Portland, OR 97208-2946

Tim Romanski
US Fish and Wildlife Service
510 Desmond Drive SE, Suite 102
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Rex Hapala
WA Dept of Natural Resources
601 Bond Road
Castle Rock, WA 98611

Sheldon Somers, Env. Planner
Cowlitz Co. Dept. of Bldg/Planning
207 Fourth Avenue North
Kelso, WA 98626

Mike Grossman
Department of Natural Resources
P.O. Box 47027
Olympia, WA 98504-7027

Judy Grigg
Port of Longview
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Longview, WA 98632

Mark Wilson
The Port of Kalama
P.O. Box 70
Kalama, WA 98625-0070

Port of Portland
Larry Patella
Manager/Navigation Division
Box3529
Portland, OR 97208

Port of Vancouver
Byron H. Hanke, Exec. Director
P.O. Box 1180
3103 Lower River Road
Vancouver, WA 98660

Senator Sid Snyder
19th Legislative District
P.O. Box 531
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Greg Fisher
WA State Dept. of Fish & Wildlife
2108 Grand Blvd
Vancouver, WA 98661

Sam Kolb
WA State Dept. of Fish & Wildlife
5405 NE Hazel Dell Avenue
Vancouver WA 98663

Kalama Economic Dev Council
Director
Kalama, WA 98625

Richard Wechsler, Corp. President
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Port of St. Helens
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Port of Woodland
Dale Boon
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Woodland, WA 98675

C. Dianne Perry, Exec. Director
Columbia River Channel Coalition
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Portland, OR 97217

Ken O'Hollaren
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Longview, WA 98632

Tom Flint
WA Dept. of Fish & Wildlife
600 Capitol Way N
Olympia, WA 98501-1091

John Savich, Director of Trade &
Economic Development
Programs/Washington
B.H.P. Coated Steel Corp.
Kalama Plant
Kalama, WA 98625

John A. Leber
Swanson Fuel
2405 Talley Way
Kelso, WA 98626

Jeffrey Hook
3313N.E. 70th Ave
Portland Oregon 97213

12/1/98

District Engineer
U.S. Army Corps of Engineer District, Portland
Attn.: CENWP-EC-E
P.O Box 2946
Portland, Oregon 97208-2946

Corps of Engineers Response

This letter is in response to the notification that our Sauvie Island property; Multnomah County Tax Lot # 1. Section 02 2N, 1W, was selected as an upland dredge spoils disposal site under the Integrated Feasibility Report for Channel Improvements and Draft Environmental Impact Statement under the "least cost disposal plan". Our family, who has owned this property for over sixty years, is staunchly opposed to this idea for a variety of reasons.

Deposition of dredge spoils on this site would impact key riparian wildlife habitat. We feel our property is significant in that it is one of the larger contiguous riparian areas along the eastern edge of Sauvie Island south of Reeder Beach. To the North and South much of the river frontage has been developed for river view homes and/or for agricultural purposes. Much of the riparian area is non existent or in a degraded state. We take pride in maintaining our property in as natural state as possible, and are frequently rewarded with spectacular wildlife viewing opportunities. The riverward, (east) side of the COE dike has been maintained for the past 60 years as a family picnic and recreation spot. Although we have been informed that the riverside portion east of the existing COE dike would not be filled, we fear that a pipeline-dredging project of this magnitude, (lasting up to twenty years or more) would severely impact terrestrial flora and fauna of the area.

The use of our property as a dredge spoils depository would severely devalue and limit the usefulness of our property. Our property is 20.64 Acres and is currently zoned is currently MUA - 20. Our family has spent both time and money researching the idea of building a home and/or farm structure on the property. Under current Multnomah County MUA 20 zoning, we may be able to realize this dream. However due to flood hazards, and setback regulations, any structure must be built on the inland (west) side of the COE dike. We have been informed that any dredge spoils would be deposited on the inland side of the dike, possibly to a depth of 28 feet and covering up

Thank you for your comments. The dredging forecast has eliminated the need for using this site for disposal of dredged material.

to 48 acres in area, thus burring any hopes of utilizing our property in this way. Furthermore we have the understanding that the Federal agencies involved would want to acquire the property "fee title" to which we are also strongly opposed, and would fight to any extent possible to prevent that from happening.

The U.S.ACOE acquisition of this property would cause unnecessary economic hardship for our family, as well as for others. Most of our inland property is leased to Jerry Parson and family, and is currently under cultivation of raspberries and marionberries. The lease provides my retired parents with a modest supplemental income, which basically covers the property taxes with a little left over. The berry crops produced by the Parsons are costly to establish and are very labor intensive, however under good stewardship, can be quite profitable. It would be a shame to see years of hard work by the Parsons to go to waste. It is easy to see that if this site was selected as an upland disposal site, it would not only hurt my family economically, but it could potentially put the Parsons out of business as well.

Construction in this area could cause more unwanted traffic problems on the Island's small rural roads, and bridge. According to our U.S. COE contact Ron Musser, if the Sauvie island site was selected it would have the potential of being a sand quarry where sand could be trucked to areas needing fill for construction. Transportation of this material from the Sauvie island site to other areas would be a nuisance to island residents, as well as a potential burden for Multnomah County. The island's roads are already bustling from congestion by an estimated 1.5 million visitors per year. Furthermore the island's only bridge constructed 48 years ago was designed with an 80,000 pound per lane load limit, which is currently under that of state highway standards. The weight limit would inevitably cause problems for truckers carrying heavy loads such as sand. There has been talk of replacing the bridge, but little if any funds are available to support the idea. If the bridge were replaced, it would be up to Multnomah County or even the island residents and visitors to carry the financial burden in the form of tolls or increased taxes.

This property has sentimental value, which cannot be valued monetarily. As mentioned, this property has been in our family for over sixty years, and is just a remnant of a much larger parcel of land which my grandfather Vern Everett once owned. To have this area selected as a disposal site would be a loss that could never be reconciled with money.

Our neighbor to the north Vira Springer, who's property is also selected under the least cost alternative, would stand to loose her quaint weekend cottage retreat, which we know is priceless to her as well. She is an avid wildlife enthusiast, and

cherishes this land for it's natural beauty. Needless to say her loss would be substantial.

Our property is an asset to the pastoral and scenic nature of the island. Conversely, a government operated, twenty-eight foot high, 40 plus acre sandbox is not a visual, which will fit in with the island's pastoral and natural beauty. With all the activity, noise, dust, and disturbance involved, such a project would certainly have an effect on other nearby residents causing annoyance and decreased property values.

For all these reasons as well as more we haven't time to list, we urge you to please reconsider using our property as an upland disposal site for dredge spoils. The preferred alternative, to deliver the sand to the Port of Vancouver seems to be a much more reasonable alternative.

Sincerely: Jeffrey Hook



And the Hook family.

PORT OF ST. HELENS

P.O. BOX 996
ST. HELENS, OREGON 97061
OFFICE LOCATION
100 1ST STREET
COLUMBIA CITY, OREGON 97018
PHONE: (503) 397-2888
FAX: (503) 397-6024

February 5, 1999

District Engineer
U.S. Army Corp of Engineers
Attn: CENWP-EC-E
P.O. Box 2946
Portland, OR 97208-2946

RE: Columbia River Channel Deepening Feasibility Report

Corps of Engineers Response

Dear Sir:

On behalf of the Port of St. Helens, I want to thank the Corp of Engineers for the work that is represented by the Columbia River Channel Deepening Feasibility Report. A wide array of issues and interests have been included in this work.

There are two areas of particular interest to the Port of St. Helens (Port) that we wish to emphasize. The placement of material at Port Westward and at the Railroad Corridor site.

1.

Port Westward is an industrial site, zoned for heavy industry and currently hosting industrial use. The Corp of Engineers (Corp) plan to receive material in an area above the 500 year flood elevation with minimum wetland impacts will be an appropriate use of a portion of this property. The Corp has devised a plan which appears to minimize environmental impacts on site. This use also appears to minimize the need for alternative off site disposal sites which would have greater environmental impacts.

The Corp also has worked with the Port to maximize future industrial use at Port Westward.

The Corp worked with the Port to examine the placement of material at the "Railroad Corridor Site". This site was contaminated by past wood treating activities. The Port and Pope and Talbot, the prior owner, have voluntarily been working with the Oregon Department of Environmental Quality (DEQ). We are nearing the completion of the Remedial

2.

Investigation/Feasibility Study (RI/FS). At this point, the main feature of remediating the site and returning it to industrial use is the planned use of material from the channel deepening project. It is currently included in the sponsors plan. We believe the benefits of this plan merit its inclusion in the final Channel Deepening Project.

1. Comments noted.

2. The Railroad Corridor site has been added to the final least cost plan contingent upon ODEQ/PSH RI/FS outcome.

February 5, 1999
District Engineer
U.S. Army Corp of Engineers

The site is industrial with infrastructure including rail. The plan we have developed allows receipt of the material in an area suitable for safe disposal and use of the material for remedial activities. The use of this area also awards impacts to wildlife habitat areas at both Ridgefield, Washington and Sauvie Island, Oregon.

2. We intend to continue to work cooperatively with the Corp to develop a final plan for use of the material from the channel project for the remediation of the "Railroad Corridor Site". However, we strongly request the inclusion of this important project element in the final Least Cost Plan.

If you have any questions or concerns please contact me at the Port office. Thank you for your cooperation and consideration.

Sincerely,



Peter K. Williamson

FORT JAMES



January 29, 1999

Ms. Laura Hicks
US Army Corps of Engineers
Portland District
333 SW First Avenue
PO Box 2946
Portland, OR 97208-2946

*Fort James Fiber Company
Lower Columbia River Fiber Farm
79114 Collins Road
Clatskanie, OR 97016*

*telephone 503 728 2171
facsimile 503 728 2721*

Corps of Engineers Response

RE: CENPP-PM - Crims Island dredge spoil placement

Dear Ms. Hicks,

We continue to be interested in having some spoils placed on the up stream end of Crims Island.

Since our last written comments to you, we received a letter clarifying the fact that Crims Island is not part of the National Refuge system.

1. We are continuing to plan with USFW to put some White Tailed Deer on the island. They believe that some spoils would be beneficial. Please check with Al Clark, at the Julia Butler Refuge 360-795-3915.

I met with your representatives on October 16, 1998. They indicated you could still use a disposal site in this part of the river.

Thank you for considering this upgrade to your plan.

If I can provide additional information please call 503-728-2171.

Sincerely,

Don Rice

1. Crims Island will not be considered further for dredged material placement. A disposal site on Crims Island would encompass wetland habitats and ESA Critical Habitat (Snake River salmonids). Thus, the site has been dropped from consideration.

**Draft IFR for Channel Improvements and EIS Document
Review COMMENTS (6 pages total)**

February 5, 1999

TO: USACE, Portland District
CENWP-PE-E Attn: Steven J. Stevens
POB 2946
Portland, OR 97208-2946

FROM: Vance Fraser
POB 1426
Beaverton, OR 97075

SUBJECT: Draft Integrated Feasibility Report for Channel Improvements and Environmental
Impact Statement (Columbia and Lower Willamette River Federal Navigation Channel)
October 1998

This is a brief review of and comments on the above document herein referred to as the Plan. This brief review focuses on Wildlife Habitat Mitigation, Dike or Levee Erosion, Economic Justification, with Alternatives and Suggestions.

Recommendations

From an engineering, safety, and health perspective, many problems are anticipated with the Plan, especially in regards to "Webb" Wildlife Mitigation Site. Deterioration of Flood and High Water Protection Dikes or Levees due to increased erosion is likely to result from the Columbia River Navigational Channel Deepening. Economic justification for the Plan is also in question. Therefore, I am against the Plan as it exists in its current form and recommend Alternatives as described herein to the US Army Corps of Engineers(USACE), Columbia River Ports, and to concerned and esteemed members of Congress. Reasons for this recommendation follow.

1. The expected responses to these valid concerns would be typical of USACE responses in the past and to be of the "hand waving" variety such as: "that is not what we expect", "is not expected to be significant", "that is not likely", "we don't find that to be true" or similar such responses should be considered non-answers and unsatisfactory. I do not fault any particular individual for attempting to do their assigned jobs within their instructed parameters, however, I do find misleading statements/answers offensive and unacceptable.

I. Summary

2. The proposed Webb Mitigation site is not a true mitigation but displaces listed and protected wildlife for other species at great expense. The site design is not engineeringly sound and would create the threat of flooding to adjacent properties, homes, and to the site itself. The site could likely become a mosquito and Nutria(a water rodent) factory causing further health issues and damage to adjacent ditches and drainage systems by the large burrowing and nesting rodents.

Corps of Engineers Response

1. Comments noted.

2. The level of safety associated with the proposed 4-foot high levees and adjacent Westport Slough levees will be given careful consideration during final design. Water levels in the mitigation marsh will normally be maintained one foot below top of levee during the winter. Storm water will be discharged gradually through control structures. The Webb Diking District pump capacity will be evaluated during final design and upgraded if necessary. Nutrias and mosquitoes currently exist in the Webb Diking District; the proposed action should not exacerbate the existing condition. Also see our response #5.

Alternatively, true Mitigation could be implemented by reclaiming appropriate dredge material deposit sites with efficient site work over the life of the project.

Increased erosion of the Columbia River bank levees due to the deeper channel, deeper draft ships, and the larger and more intense attack to the river bank levees by their larger induced waves, swells, and suction is highly likely.

It is most difficult to trust in the USACE stated desire of reducing maintenance dredging costs associated with this project and those dollar amounts or "savings". In certain areas of the Columbia River, a major factor causing erosion and rehandling of the dredged material, is vessel traffic. If the USACE were truly interested in reducing dredging quantities, rehandling, and thereby costs, they would facilitate the setting of an appropriate speed limit for large vessels on the Columbia River due to the significant erosion and dredged material rehandling they cause at speed. The need for Pile Dikes would likely be reduced since less eroded or previously dredged material would become river sedimentation. Speed limits were somehow enacted on Interstate or Federal Highways for safety and economy so I know this is possible.

The economics of the plan are not justified. Using the values from the Sensitivity Analysis which appear to be much more likely or at least just as probable, **the Benefit/Cost Ratio is only 1.01 and is not comfortably higher than the costs of dredging which could easily escalate** due to increased erosion and rehandling as well as required dike repairs, neither being considered nor included. Furthermore, the benefits do not go to the US Taxpayer who pays for them but more likely into the pockets of the Foreign. US Taxpayers should not be paying for this Plan of Channel deepening, maintenance, nor this study.

It is likely that the Plan will increase costs to the US Taxpayers, to the environment/wildlife, to recreational users (potentially in the form of their lives due to ship wakes) and the destabilization of river banks/levees in certain areas over time.

II. "Webb" Wildlife Mitigation Site

Designating the Webb site as a mitigation site does Not in fact make it a true mitigation but actually a false and negative mitigation. Removing habitat used by listed and protected species such as White tailed deer and Canada geese as well as pasture, by transforming it into a "duck pond" which will just as likely become a mosquito and nutria factory is false or negative mitigation. These ducks already exist throughout the region and other more sensible sites are available. If drawing lines on maps and changing ownership to the USACE so they can go through the motions to satisfy the laws as they have interpreted them, is called mitigation, this could be done at a substantially lower cost of property: Property already owned by the gov't in the form of under-utilized Wildlife Refuge Land or Reclaiming into habitat, sites used over the course of this project as Dredged Material Deposit Sites.

Alternative 1

Under-utilized existing wildlife refuge area use would eliminate the site cost, travel cost, and much of the management costs to the government. The nearby Julia B. Hansen National Wildlife Refuge near Cathlamet, Washington contains areas that are similarly utilized pastureland with grazing cattle as in Webb District. Creating a duck pond within this refuge would be

Corps of Engineers Response

3. Sections 5.1.5.3, 6.2.2, and 6.2.3.1 of the report discuss ship wake caused erosion.

4. Section 4 of the EIS provides an economic comparison of the channel improvement alternatives and shows benefit-to-cost ratios well above unity. The sensitivity analysis presents a break-even scenario, which should not be confused with a worst-case analysis or even a lower-bound analysis.

5. The Webb Mitigation site is the most cost-effective mitigation site considered in the suite of sites analyzed (Appendix G, Section 7.4, Cost Effectiveness). No ESA listed species would be displaced. Rather, there would be a net increase in riparian habitat which would benefit Columbian white-tailed deer, the listed species that does occur in the area. Some tradeoffs for other wildlife species, such as Canada geese, would occur under the proposed mitigation plan. National Wildlife Refuge lands were not considered for mitigation purposes as they are managed for their own established objectives.

Corps of Engineers Response

adding improvement to the refuge. Current refuge personnel could manage the improvements reducing costs further.

Alternative 2

Dredge material deposit sites or parts thereof, fully utilized during the course of the channel deepening project could be utilized without incurring additional property costs and would be the truest form of mitigation as well as site reclamation. Since the channel improvement project is essentially a mining operation, it should fall under the same site reclamation guidelines as required of mining operations, which would automatically reclaim habitat as the project progresses with no additional site property costs.

6.

Alternative 3

Properties adjacent to existing refuges would eliminate travel and much of the management costs to the government.

Alternative 4

Locating mitigation sites on Port of Portland properties in or near Portland would be a truer mitigation since that is the area in which the most wildlife habitat is being and has been consumed. This is not so outlandish as the USACE spending half a million dollars to Hopefully cause Caspian terns to relocate off Rice Island. They may very well succeed in this effort, causing them to move to an area where they can do just as much damage, or worse, to the little salmon... which presents another good case for Alternative 2 above. If not, why not? Why is it imperative to ruin agricultural lands which also support endangered species as well?

It is clearly apparent that the relevant private enterprises, the Columbia River Ports, and the USACE would like to shift the burden or parts thereof, of Federal and Port mitigation costs onto the backs and pocketbooks of local landowners and other affected locals. These entities should take care of their own mess and not plop it on others, causing mayhem and destruction in their wake, as well as seen and unseen costs to those adjacent and affected landowners. It appears to be a "we have plans for our property so go find someone else's to screw up" scenario.

7.

When USACE personnel were questioned about potential problems they claimed they do not guarantee perfection, indicating that problems could occur. It is most apparent that their job is do what it takes to get the job done at as low a cost as practical, unless wildlife enter into the picture -- then spend wildly, and if it affects humans ... oh well...

It is interesting to note that government reports document the severe decline of agricultural lands as well as the small farmer. Some predict food shortages in the future. It is evident, and documented that small farms and farmland are threatened and endangered. Why have there not been USACE policies to mitigate farmland? If a food shortage were to occur when the employees of the same entities in favor of this Plan are retired and old, will they still be in favor of another channel deepening project then or to fill it in and keep the food at home? If not then and them, do they care about their children and what they might have to eat when they are old? Will it be worth eating with the burned out topsoil lacking the multitude of minerals and nutrients we need beyond the fertilizer to make it grow? Heck there is money to be made! Let's screw the future generations! Who believes those gov't reports anyway!?

6. It would not be practicable, from the standpoints of cost and development of fully functional, natural habitats, to use fully utilized disposal sites for mitigation purposes.

7. Lack of property, high real estate values, and potentially high implementation costs preclude locating mitigation sites on Port properties or near Portland. However, a 1,200 acre ecosystem restoration measure adjacent to the Port of Vancouver is included in the proposed action.

Corps of Engineers Response

Locating a mitigation site in the middle of agricultural lands creates an adverse relationship between wildlife and the adjacent agricultural purposes and practices. The wildlife will not remain in mitigation site borders. They will forage on and cause Damage to the adjacent succulent agricultural lands. The Webb mitigation site constructed as described will likely attract additional predators such as coyotes from the nearby hills to prey on the easy pickings of nesting waterfowl and when they are all gone they will likely turn to the other young livestock on our agricultural lands. USACE should and will be held liable for damages.

8. No mention was made in the mitigation criteria regarding a disturbance factor for the Mallard as there was for the Canada goose. Seasonal hunting by humans in adjacent properties and mostly year-round hunting by local dogs and cats or other predators such as coyotes, weasels and other rodents, and certain birds of prey will be a disturbance to the mallard. This is not a park like setting as found in the Portland area where ducks swim about carefree.

The Webb mitigation site would most likely remove 181 acres of Canada goose habitat rather than the estimated 32.6, since the geese prefer the wide-open agricultural lands to feed on and to see perceived threats. This will concentrate the local and migrating goose populations onto the surrounding agricultural lands increasing its destruction by these geese.

9. I commend the attempt to put numbers to the mitigation sites preparation and operating costs. However, one must be careful to note that these are just estimates, which can vary widely from actual. For instance when many very similar properties exist along the Columbia River from Portland to Astoria and if the same types of site work were done to these properties for mitigation purposes, logic would dictate that these site work costs would not vary significantly. In many cases regarding site selection and cost effectiveness it was an apples to oranges comparison. More expensive types of mitigation operations were designated upon certain sites than others, so a true cost effectiveness comparison was not evident. These costs would likely be just as low for other locations as those stated for the Webb site.

Webb Mitigation Engineering Soundness Problems

The designated 21.87-acre wetlands portion appears to utilize the interior side of the existing dike which protects against Westport Slough. This dike is a soft dike, during high water conditions there is a potential for water to further soften and seep or boil through the dike. These dike weaknesses could easily become dike failures if not observed and repaired in time. The proposed plan would compound the problem of the soft dike by further softening the dike from the inside and also hindering the observation of any direct boils or weaknesses. This is not acceptable.

10. The designated 70.13-acre wetlands portion appears to butt up against the interior side of the existing dike which protects against Westport Slough. Although this makes for wider cross section, a similar condition exists to that mentioned above where the dike could be further softened from the inside and also hindering the observation of dike seepage, boils, or weaknesses. This is not acceptable.

It is important to note that areas where water occurs on both sides of the dike have proven to be weak points; demonstrating dike boils and dike failures in the past.

8. Wintering Canada goose populations are currently estimated at 350,000 birds, a magnitude increase since the mid-1970s. Depredation issues associated with wintering Canada geese exist and are being addressed by state and federal wildlife agencies. The scope of the proposed mitigation action at Webb would have no bearing on the level of goose depredation on adjacent lands given the size of the wintering Canada goose population. Farming practices, whether it is conversion to nursery operations, hybrid poplar plantations, fall fallowing of farmland, or herbicide treatment to prevent vegetative growth, far surpass in terms of acreage made unsuitable annually for goose foraging, the impact of the Webb or other mitigation sites on goose forage availability. One or two pairs of coyotes would be expected to inhabit the Webb Diking District at this time. The proposed mitigation action would not increase the number of coyotes present.

9. Mitigation measures were developed based upon individual site characteristics. Our intent was to develop the best habitat management practices conceivable for each site. Cost determinations and analyses were subsequent to biological decisions.

10. This safety contention will be given full consideration in PED to assure there is no diminishment of safety for Webb Diking District.

Corps of Engineers Response

It is likely during the rainy months, for the site to reach accumulated water capacity. Further rains would go directly into the ditch and slough system, which does not have the capacity and would overflow onto adjacent lands. This is not acceptable. The fields as they exist now create a residence or lag time for rainwater to gradually enter the ditches and be pumped out over time at maximum pump capacity.

11.

It is likely that the end result of all the efforts towards mitigation of targeted wildlife at the Webb site would be an over growth of nutria, a non-indigenous large water rodent species and mosquitoes. These rodents would further borrow and damage the ditch and slough banks. The mosquitoes a disease-carrying vector could do much damage in many scenarios.

III. Erosion of River Banks/Levees

Shoreline erosion will likely increase for at least two reasons: 1. Deeper draft ships pushing a higher wall of water attacking the shoreline along with greater suction created by the larger amount of water displaced. 2. River pilots in the slightly lesser draft ships traveling at higher speeds knowing that they have greater margins of safety beneath and beside, pushing an even higher wall of water attacking the shoreline. Also the deeper channel itself in areas of close proximity to the shoreline or riverbanks will cause erosion which will be significant to those affected. Not including provisions for this erosion or incorporating a remedy into the project plans is totally irresponsible. One can conclude that this will likely increase their sediment budget and that together with the erosion control measures could easily make this project economically unviable.

NOTE: A specific ship's wake is proportional to the square of that ship's speed. NOT ship wakes are proportional to the square of speed. Meaning larger displacement = larger wave.

12.

Alternative 5

If the USACE were truly interested in reducing maintenance dredging costs associated with this Plan, they would facilitate the setting of a speed limit for large vessels on the Columbia River. The erosion created and subsequent Rehandling of dredged materials would be reduced. The need for Pile Dikes would be reduced since there would be less sediment load in the river.

Again the USACE avoids this and their typical hand waving answers similar to "increased erosion is not expected to be significant" are unsubstantiated. However, individuals who have seen how much dredged material is dragged into the river after a ship passed at speed would tend think erosion could very well be a problem, especially with the configuration of the new upland disposal sites. If it were somehow true, baseline erosion in itself is significant and would be just cause for a speed limit for the same reasons.

It is also interesting to note that in a historical USACE engineer's report it states, "Because of the improvements in Columbia River by the United States government for navigation purposes the effects along the shore upon applicant's lands in increasing erosion is particularly manifest and should be stopped by appropriate works." Which is in direct opposition to what USACE personnel claim in the Plan. One can only speculate that this was a flood control engineer rather than a ship channel engineer.

Furthermore, the approx. 210 mile round trip on the Columbia River is almost insignificant

11. Water management will be given full consideration in the next phase of design (PED) to assure there is no increase in flooding of adjacent lands in the Webb Diking District.

12. Comments noted. See our response #3.

compared to the 11,500 mile round trip total for a typical vessel used in the Plan. This would indicate that it is not even remotely necessary for these larger vessels to travel at the higher speeds in which they do, while in the Columbia River.

Corps of Engineers Response

IV. Lack of Economic Justification

Implementation of this Plan will likely create NO significant increases in:

National Security

National Economic Benefits

Regional Employment

Regional Economic Benefits

With the conservative Benefit/Cost Ratio (using Sensitivity Analysis figures) of 1.01, the Plan does not appear justified. The Taxpayers funds could be put to a much better use at a much higher Benefit/Cost Ratio in those Taxpayer's pockets. This would add to the economy and give National Economic Benefit in multiples beyond this Plan.

13. See our response #4. The analysis assumes that wheat shipments to Japan would not benefit from a deepening.

13.

The true accounting is that the majority of the exports are grain which goes to Japan in a vessel with limited depth and this is not expected to change. It is time to face facts, the US Taxpayers are going to be required to pay out an amount approaching \$100 million for this project and they are going to get less than zero benefit, being burned out topsoil. All dollar benefits go to a handful of companies, likely foreign shippers or buyers. This does not make the United States or this region more competitive. It is simply a gov't authorized robbing of the many to give to the few who don't need it.

Furthermore, there is no guarantee that dredging will not increase rather than the claimed decrease due to rehandling, thereby driving the project cost up further. Not to mention that in general, costs could easily creep upwards, and often do.

Although a great deal was written to justify a projected increase in container business to further justify deepening the channel there is no way to know what the future holds for containers in this region and I commend the Sensitivity Analyst who gave it a more reasonable look.

V. Conclusions and Suggestions

Reclaim Dredged Material Deposit Sites or use under-utilized nearby Wildlife Refuge areas for Mitigation to reduce project costs. Additional land costs would be eliminated. Some of the equipment utilized for the Dredge Depositing work could be used for some of the Mitigation Site work in the Dredged Material Deposit Site reclamation scenario.

14. Comments noted.

14.

Facilitate appropriate speed limits on large vessels to reduce erosion, rehandling and dredging costs. The need for Pile Dikes would likely be reduced since less eroded or previously dredged material would become river sedimentation. This should be done regardless of the Plan being implemented or not.

Ultimately, this project does not have a significantly comfortable Benefit/Cost Ratio and should not be implemented.

February 3, 1999

To: U. S. Army Corps of Engineers, Portland District
CENWP-PE-E ATTN. Steven J. Stevens
P.O. Box 2946
Portland, OR 97208-2946

From: Scott Fraser
P.O. Box 611
Clatskanie, OR 97016
ph. (503) 728-4318

RE: Draft Integrated Feasibility Report for Channel Improvements and DEIS. October 1998.

FOCUS OF THIS LETTER; An alternative to the use of existing farmland and wildlife habitat for mitigation (creating new wetlands).

PROPOSAL; Create new wetlands on top of existing and future dredge spoils. (see attached drawing).

ADVANTAGES:

1. Will save taxpayers money.
 - a. No purchase and excavation of land necessary.
 - b. Work at site can be completed while equipment from dredging is still there
 - c. Land would not be removed from the tax roles, thereby not placing a greater burden on remaining property.
2. Aesthetically appealing.
 - a. Will turn an unsightly sand pile into nice duck habitat.
 - b. Will stop blowing sand.
3. Will solve the problem of the Caspian Tern using dredge spoils for nesting.
 - a. This will save many juvenile salmon.
4. Will keep land viable for the threatened Columbian white-tailed deer and Dusky goose which currently utilize the "Webb" mitigation site.
5. Will keep land in agricultural use.
 - a. Agricultural land is disappearing at an alarming rate now.

Corps of Engineers Response

Thank you for your assessment. Wetland development on top of dredged material consisting of well-drained sand would not be practicable in terms of cost and wetland function.

DISADVANTAGES;

1. None apparent.

SITE PREPARATION;

I understand that the Corps deliberately levels the dredge spoil piles so ponding will not occur. If ponding does occur the area gets designated a wetland and no further work can be done in that location.

So when the dredge spoil sites are nearing their final height, it would be easy and cost effective, for the Corps equipment to make a pond rather than leveling the top.

At the same time a barge load of bentonite clay (to seal the pond bottom or a pond liner) and dirt (to grow duck food and trees) could be spread.

A windmill pump to fill the pond should be sufficient and an overflow pipe to keep the water level constant.

The rim of the pond should be 6 to 10 ft. in height to provide a windbreak and should be planted with grass.

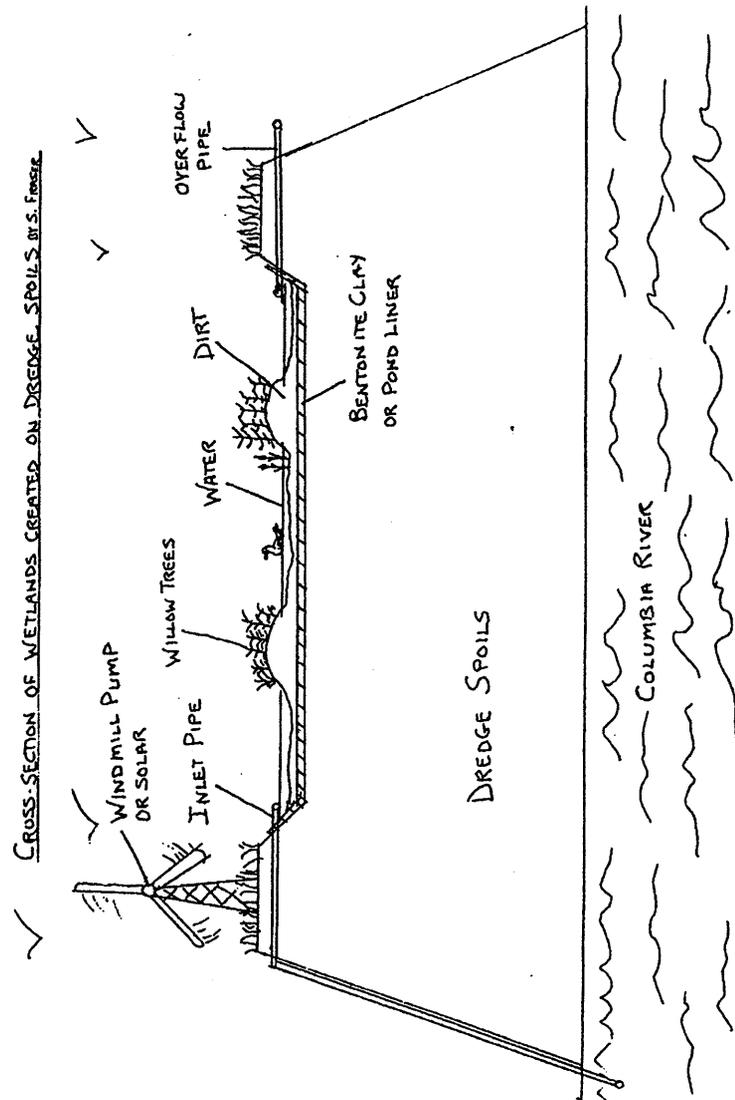
Please consider this alternative and feel free to call and discuss it.

Sincerely,

Scott Fraser

Scott Fraser

A concerned agricultural land owner.



MEMORANDUM

February 2, 1999

To: U.S. Army Corps of Engineers, Portland District
CENWP-PE-E ATTN: Steven J. Stevens
P.O. Box 2946
Portland, OR 97208-2946

From: Scott Fraser, President
Webb District Improvement Co.
ph. (503) 728-4318

Corps of Engineers Response

RE: Draft Integrated Feasibility Report For Channel Improvements and DEIS, October 1998.

Webb District Improvement Co. is the local entity having authority over matters affecting Webb District. This Memorandum is to notify the USACE that Webb District Improvement Co. cannot be in cooperation with and must prohibit the proposed "Mitigation" plan for the "Webb" site as referenced in Appendix G of the plan for the reasons as follows and suggests the USACE find a more suitable alternative or follow the recommendations as described herein:

Does Not Comply With The Purposes Of Webb District Improvement Co.:

1. The formation of this State of Oregon authorized corporate district under the provisions of ORS 554.010 to 554.340 was and is a proper method of accomplishing the improvement and protection of the lands within the Webb District.

2. As stated in the corporate articles: "The purpose and intent of the corporation is to improve the lands of the members thereof by draining, irrigating, and protecting said lands from floods and high water." "The improvements set forth in these articles are, and will be, for sanitary and agricultural purposes,"

3. The USACE "Webb" Mitigation plan does not comply and is inconsistent with the purpose and intent Webb District Improvement Co.

a. The USACE "Webb" Mitigation plan is not for agricultural purposes.

b. The USACE "Webb" Mitigation plan is not sound engineering: could and would likely cause flooding to adjacent lands within Webb District, promotes the weakening of the dikes or levees, and hinders the ability to monitor weaknesses in these dikes.

4. Of the Webb District Improvement Co., a majority of the vote carried the motion to exclude the USACE "Webb" Mitigation plan for the above stated reasons.

5. It is highly likely that the effects of the USACE "Webb" Mitigation plan is also inconsistent with the Flood Control Act.

Is Not Sound Engineering:

1. During periods of heavy rains when the "mitigation" pond(s) are at maximum water height, additional rains would flow immediately and directly into the sloughs and ditches within Webb District which are not designed for and do NOT have the capacity to handle this amount of flow and would overflow onto adjacent landowners properties, potentially flooding barns and homes as well, regardless of the USACE typical response that they don't think that would happen.

1. Comments noted.

2. The Webb Mitigation site is the most cost-effective mitigation site considered in the suite of sites analyzed (Appendix G, Section 7.4, Cost Effectiveness). No ESA listed species would be displaced. Rather, there would be a net increase in riparian habitat which would benefit Columbian white-tailed deer, the listed species that does occur in the area. Some tradeoffs for other wildlife species, such as Canada geese, would occur under the proposed mitigation plan. National Wildlife Refuge lands were not considered for mitigation purposes as they are managed for their own established objectives.

The project sponsor (Ports) are responsible for acquiring lands required for project implementation. Any legal issues regarding whether lands in the Webb Diking District can be used for mitigation purposes will be resolved by the Ports.

3. The level of safety associated with the proposed 4-foot high levees and adjacent Westport Slough levees will be given careful consideration during final design. Water levels in the mitigation marsh will normally be maintained one foot below top of levee during the winter. Storm water will be discharged gradually through control structures. The Webb Diking District pump capacity will be evaluated during final design and upgraded if necessary. Nutrias and mosquitoes currently exist in the Webb Diking District; the proposed action should not exacerbate the existing condition.

Corps of Engineers Response

2. In drier months or periods, if it is the intent for the USACE to pump water from these sloughs and ditches into their holding ponds, this would rob water available to the adjacent agricultural lands for which it was intended as well as other fish and wildlife which naturally occur there and also those that benefit from the agricultural lands such as the listed and endangered species which utilize them.
3. The Webb District Dikes are made of a soft material which has been shown to readily weaken and to more readily weaken in areas where water occurs on both sides of these dikes.
4. Creating the condition of water on both sides of these dikes would make monitoring dike weaknesses, seepage, and boils through the dike from the water side to the interior side, where water is intended to be guarded against and kept out of, much more difficult if not impossible.

Recommendations:

1. To avoid additional purchases of property and to perform true mitigation rather than displacing listed and protected wildlife in favor of other wildlife.
2. To avoid creating an adverse relationship between the "mitigated wildlife" and the adjacent agricultural purposes and practices since the mitigated wildlife will not remain within the mitigation site borders by placing a "mitigation" site in the middle of agricultural lands when other more appropriate and more sensible sites are available.
3. Reclaim and utilize in an efficient manner, suitable and appropriate Dredge Material
4. Deposit Sites which will have been purchased for the Channel Improvement Project and is the cause for the "mitigation". We would be happy to discuss efficient methods of site reclamation and mitigation with you; such as pond or land fill liners or bentonite clay to enable ponding for "puddle ducks"
4. Utilize nearby US Fish & Wildlife game reserve properties since they have similar type of land and agricultural practices occurring on those lands as in the Webb District and could easily be considered under-utilized for game purposes.

Please contact me if you would like to discuss the matter further.

3 (continued). Provision of water for the mitigation site, if determined to be necessary, will require a water right from the State of Oregon. Provisions of the water right will determine where water will be obtained and in what quantities.

Your concern about soft dike material and other dike safety concerns will be given full consideration in the next phase of design (PED) to assure there is no diminishment of safety for the Webb Diking District.

4. Comments noted. It would not be practicable, from the standpoints of cost and development of fully functional, natural habitats to use fully utilized disposal sites for mitigation purposes.

1425 N.W. 48th St.
Vancouver, WA 98663

February 5, 1999

Portland District
U.S. Army Corps of Engineers
ATTN: Laura Hicks, Project Manager
P.O. Box 2946
Portland, OR 97208-2946

Corps of Engineers Response

Dear Ms. Hicks:

I am writing you regarding the proposed Columbia River Channel Improvement Project. Specifically, I am interested in the disposal of the resulting spoils.

Thank you for your comments. We will not be using these sites for dredged material disposal.

At one time a site on our property to the east side of the road, I believe identified as 96.5, was considered as a proposed disposal area. In the meantime we have sold the property to the State of Washington Fish & Wildlife Dept. This property is in the area of the Shillapoo Eco System restoration project, and probably would have been inappropriate anyway.

May I offer, and suggest, a "one more time" look at our other sites identified as 96.6 and 96.7 on the Dec. 19, 1996 draft map. This property lies between the road and the river, and would be a much more appropriate place to deposit dredge spoils. It provides marginal habitat and agricultural use at best, and at the same time would offer an excellent opportunity to return cleaner dredging run-off water to the river, of itself a concern of wildlife interests.

The material placed there could also be available to Diking District 14, to repair or re-inforce dike sections, should the need arise sometime in the future. This has been done in the past.

The site received dredge spoils in the 70's, and was also on the Port of Vancouver's list of proposed disposal sites into the 80's.

In closing I hope you can find some merit in my concern and proposal, and would welcome the opportunity to discuss it further with you or any member of your staff.

Very truly yours,

Hans Egger
Hans Egger

Phone 360-693-4139
FAX 360-750-7949

*P.S. - I would be available for a possible
on site inspection, if it would be helpful.
Hans Egger*

February 2, 1999

U.S. Army Corps of Engineers
Portland District
CENWP-PE-E, Attn: Steven S. Stevens
P. O. Box 2946
Portland, OR 97208-2946

Corps of Engineers Response

Dear Sirs:

We, the undersigned property owners along the riverfront on Ostervold Road on the West end of Puget Island, would like to express our opinions and register our requests concerning the dredging of the Columbia River and the placing of dredged sand in our area. We wish to go on record against the proposed deletion of spoils on our beach. We will be adversely impacted, if our beach area is no longer a disposal site or "beach nourishment site." (W38.7)

We must point out that dredged material has been placed on our beach area for many years, and the property owners have appreciated the sand and have come to depend on this periodic dumping of the spoils to maintain the presence of a desirable sandy beach. The property owners in this area have signed long-term easements, permitting the Corps of Engineers to access our properties with heavy equipment and materials to maintain the beach nourishment site. To put it simply, we have come to expect that the beach would continue to be enhanced and protected by periodic dredging. To date, this has been beneficial to the Corps as a convenient disposal site for dredged materials.

It should be noted substantial amounts of dredged sand have been hauled away for commercial use and for use by Wahkiakum County for dike and road maintenance. This most certainly is a desirable "beneficial" use of the material.

The criteria for selection in the DMMP are met for this site for all six environmental criteria and for five of the six engineering criteria. (W38.7) The factor that apparently led to the deletion of this site was it would result in rehandling of material or creation of a shoal.

We are aware of the fact that beach erosion is a problem. Extensive personal observation of this by many people lead us to believe that the waves from the many ship wakes is the major factor causing this erosion although wind waves and currents also contribute. This statement is at odds with the four percent-to-twenty-four percent estimate contained in the DMMP. We believe

Disposal site W-38.7 is a highly erosive site. Most of the material placed there in the past has eroded and much has returned to the navigation channel shoals requiring repeated dredging. Continued use of this site would be very expensive to the Corps and not in the best interests of the Federal Government.

The estimate that ship wakes cause 4 to 24 percent of the beach erosion comes from a study conducted by Abbe (1990) at W-38.7. The study measured erosion at W-38.7 and two other beach nourishment sites. This is the only ship wake erosion study conducted on the Columbia River.

Local residents could act as a sponsor for a potential beach nourishment action and would be responsible for obtaining a fill permit for the site. The Corps would then work to provide the dredged material, with the sponsors paying the incremental cost. The incremental cost would be the difference in cost between using beach nourishment disposal and the government's least cost disposal alternative.

that further study done in an adequate long-term time frame-- representing the varying conditions of the river--would support our contention. The erosion problems could perhaps be alleviated by pile dikes in this area, by reduced vessel speed--within the limits for navigational safety--during high water levels, or by other erosion barrier methods.

If the proposed channel deepening to 43 feet takes place and larger ships use the channel, this will cause an even greater erosion problem. Channel deepening would, of course, result in a greater need for dredged-material disposal sites.

We feel that disposal site selection should not be based solely on cost and efficiency factors. The effect on the human factors and on the quality of life should be given greater weight. There is significant use of this beach area for recreational activities by a great many people other than the property owners. These activities include fishing, boating, kayaking, beach combing, sailing, swimming, etc. The aesthetic value of sandy beaches is so well known it requires no comment. Great efforts are being made throughout our nation to save our beaches. So should such efforts be made in this case.

It should be noted that the economic losses to our community, as well as, to the property owners would be significant, if the sand on this beach were to disappear.

On reviewing some of the earlier comments which are attached to the DMMP we note the State of Washington Department of Ecology in their comment letter of February 23, 1998, states: "While recognizing the need to be as cost effective as possible in developing an optimum disposal plan, we believe it would be an unnecessary and premature decision to drop certain disposal sites that have been used in the past.

The occasional placement of relatively small quantities of dredged material at key locations may no longer seem warranted to the Corps, but may be of significant importance to the party(ies) impacted by the lack of available dredged material or the monetary means to carry out such work on their own."

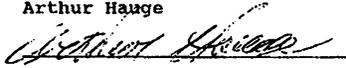
The Port of Portland in their comment letter of February 24, 1998, recommends an alternative to the proposed Corps plan as follows: "All beach nourishment sites which meet agency criteria should remain as designated disposal areas subject to whatever restrictions may be imposed. Corps of Engineers dredging and disposal practices will utilize these sites based on economic, operational, beneficial use and other criteria. It is anticipated that circumstances may change over time and the retention of the maximum number of beach nourishment sites will provide the greatest flexibility while at the same time addressing the goals of the channel maintenance program."

We hereby request that the above beach nourishment site (W38.7) be included as a disposal site as it has in the past and that all appropriate measures to decrease beach erosion at this site be undertaken.

Very truly yours,

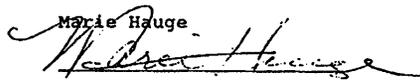
Please see attached signature pages.

Arthur Hauge



195 Ostervold Road
Puget Island
Cathlamet, WA 98612
Telephone: 360-849-4157

Marie Hauge



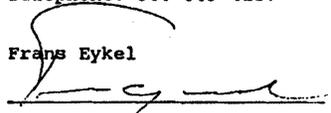
Lorene Lee Glass

191 Ostervold Road
Puget Island
Cathlamet, WA 98612
Telephone: 206-706-1817

Ward Glass

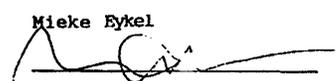
FAX

Frans Eykel



199 Ostervold Road
Puget Island
Cathlamet, WA 98612
Telephone: 360-849-4254

Mieke Eykel



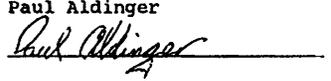
Jeff Bollen

189 Ostervold Road
Puget Island
Cathlamet, WA 98612
Telephone: 360-786-0549

Sherrill Bollen

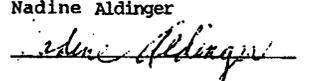
FAX

Paul Aldinger



197 Ostervold Road
Puget Island
Cathlamet, WA 98612
Telephone: 360-849-4484

Nadine Aldinger



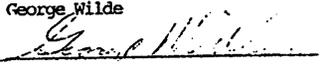
Richard A. Siltanen

181 Ostervold Road
Puget Island
Cathlamet, WA 98612
Telephone: 800-547-8245

Carol Siltanen

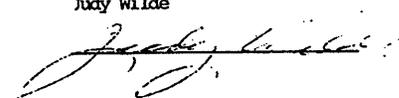
FAX

George Wilde



205 Ostervold Road
Puget Island
Cathlamet, WA 98612
Telephone: 360-849-4170

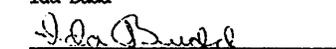
Judy Wilde



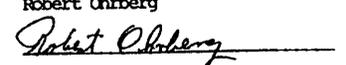
Garland Budd

195 Ostervold Road
Puget Island
Cathlamet, WA 98612
Telephone: 360-849-4009

Ida Budd



Robert Ohrberg



249 Ostervold Road
Puget Island
Cathlamet, WA 98612
Telephone: 360-849-4323

Patti Ohrberg



Stevens, Steven J NWP

From: Hicks, Laura L NWP
Sent: Tuesday, November 17, 1998 12:17 PM
To: Stevens, Steven J NWP
Subject: FW: 43 Ft Channel Comment

----- Original Message -----

From: Robert Johnson [[SMTP:realjohn@pacifier.com](mailto:realjohn@pacifier.com)]
Sent: Tuesday, November 17, 1998 11:13
To: [Laura L.Hicks@usace.army.mil](mailto:Laura.L.Hicks@usace.army.mil)
Subject: 43 Ft Channel Comment

Corps of Engineers Response

Dear Sir:

I attended the Astoria channel deepening meeting on the evening of Nov. 12 and would like to add a strong voice of support to moving forward with the project. I am a Columbia River Bar Pilot and a deep draft user of the waterway and well know the safety and commercial value of increased draft potential. We have already lost calls of the larger container ships due to draft restrictions. We are moving into the next generation of these ships, those of 6,000 plus TEUs and second tier ports, of which Portland is an important one, are going to have to absorb the ships which are being pushed down the size chain. To allow the larger ships to call and load increasing cargo amounts more depth is required. On the bulk carrier side I see panamax ships routinely sailing about 5,000 tons short of their capacity. This diseconomy hurts local shippers, ship owners and the competitive position of the River. Now it is mostly grain ships that are affected but we will be seeing more potash and in the future inbound gypsum moving in these size ships. The number of ships being restricted is becoming greater all the time.

Maximizing the competitive position of the Columbia River system is of critical importance to the local, regional and to a lesser extent the national economy. Locally we are all benefiting from the economy the River affords local importers and exporters. The discount stores would not be nearly as discount without a viable port to handle the products they sell. The Northwest is resource oriented and the ability to get our products to the world market efficiently is critical to our competitiveness. The Columbia River's influence is felt on the corn and wheat fields of the midwest and we all benefit in either big or small ways.

As it is not a perfect world, there will be some for whom this will have negative affects. The project should be done with care and all that is possible done to mitigate these negative influences but they should not be allowed to scuttle moving forward on what is good for the majority of the people and the nation.

Capt. R. Johnson
Columbia River Bar Pilot

Comments noted. Thank you for your comments.

Nov. 5, 1998

Davis G. Moriuchi
Deputy District Engineer
Corps of Engineers
Box 2946
Portland Or. 97208

Jerome J. Parson
23000 NW Gillihan Rd.
Portland OR 97231

Corps of Engineers Response

I received a letter from the Port of Portland on May 14 1997, Subject TEN YEAR CHANNEL DEEPENING STUDY- TEMPORARY PERMIT FOR SURVEY AND EXPLORATION. Attached to the letter was two enclosures, one the Legal Document to be signed, if permission were to be granted (which all sounds very benign), and a second enclosurea DRAFT dated Dec. 19, 1996, which showed the Eastern part of my property, 48 acres as a New Proposed Site for dumping Dredging.

So 6 months ago some Dullard made the proposal to destroy 48 acres of some of the most fertile farm land in the Valley by dumping dredging on it and the rest of the bureaucracy agreed with it.

This was almost as stupid an idea as proposing the property adjacent to my South property line as a site for a 1600 bed Prison on Sauvie Island.

Apparently two years ago when I gave the U. S . Army Corp. of Engineers permission to enter my property last year, just as you have requested, they must have thought that was like a license to consider my property as a dump site.

1. Comments noted. The Sauvie site has been dropped from further consideration as a disposal site.

1. First of all I would like to explain that I am in favor of dredging the River Channel to 43 feet.

Second- I find it some of the proposals presented in the study flawed and in some cases giving an appearance of not only ignorance of agriculture and lack of investigation, but an arrogance in regard to private property.

In the study my property was identified as 0-98.5, Sauvie Island Page 6-27, under Item 6.6.2.5 titled " Least Cost Disposal Alternative", "This site occurs on Sauvie Island, Interior to the dike and just upstream of Dairy Creek. Lands at this location are used for agricultural crops; presently the site is in Caneberries. The balance of the paragraph goes on to talk about Wildlife.

In the case of my property, I own 48 acres at the site identified, 36 acres which are in Caneberries and 12 acres on which is my personal residence, my House and Garage, my Barn, my Employees house, my Garden and a small Orchard exist.

The 36 acres of Caneberries are Marion Berries and have underground Tiling, underground Irrigation piping, Posts, and Wires. Marion Berry plants have a 20 to 25 year life and looking at the total investment in Caneberries not only do you have to consider the costs of the investment in tiling irrigation, posts and wires, both material and installation costs but the opportunity costs of losing the income of the berry fields of the next 15 to 20 years. At an average of \$.80/lb and an average of 8000 lb./ acre. the loss is about 230,000.00/yr or between \$3.5 to 4.6 Million Dollars.

I lease 4 acres between my Marion field and the Dike from Mr. & Mrs Hook, and that is planted in Rasberries and is similar to the Marion Field in investment, and at 7500lbs @ \$.60/lb. is a loss of about \$18,000.00/yr or \$360,000.00. So this " Least Cost Proposal " Should reimburse me for the cost of my House, Barn, and 48 acres of land, the investment in the fields and the loss of income of over 4.5 Million Dollars.

Corps of Engineers Response

The 48 acres identified also include small parcels of land that belong to Mr. & Mrs. Hook, Mrs. Vera Springer, and the Mc Farlands. Other than the Hooks' the Springer and Mc Farland properties are less than an Acre, however the Fill would also destroy the Mc Farlands' garage.

2. Item 6.8.2.5 Prime and Unique Farmlands on Page 6-45 says, The Farmland Protection Act (Subtitle 1 of Title XV of the Agriculture and Food Act of 1981) requires the Corp to contact the Natural Resource Conservation Service for Identification of prime or unique farmland potentially impacted by the Corps action. Nowhere in the report do I see reference to such identification of 0-98.5 and the only reference is to the 107 acre dairy site in the scapoose bottoms.

As to my earlier comment as to the Arrogance in regard to private property, it appears to me that their is a total disregard as to the importance and value to the owner of private property.

In the State of Oregon 86% of all of the land in the state is owned or controlled by some form of government; National Forest, State Land, BLM, Parks, County, City, Port of Portland, other Ports etc. Every time a big project comes along there is a concerted effort to buy or condemn or confiscate private property. Prison Siting or dredging is a prime example.

When I asked if the Corps had considered putting dredging on the Federal Wild Life land the said they could not do it. The same went for Smith and Bybee Lake, which since the Corps filled the area to become Rivergate and Terminal 5-6, Smith and Bybee Lake have existed as a Mosquito bearing swamp and not a Gateway to Nature regardless of what the signs say. The Shillapoo Lake project would compensate for the approximate area and be truly usable to wildlife.

3. I have come to understand that the evaluation of land to determine the least cost method include all of the costs to obtain the site for dredging and the cost to do the actual dredging ie the cost of pumping barging and so on, but does not evaluate the cost of the land disposal after the dredging is completed. In the case of my property (0-98.5) the 48 acres would be worthless. Without top soil it would not be farmable, and because the zoning is EFU 50 acres it would not be able to be used as a building site and would stand as a monument to the Corps actions just like the piles of sand off I-5 at the Toutle River.

If the Corp filled in Smith or Bybee Lake or any other potential Industrial site, the disposal of the land after the completion of the dredging would bring in an income of about \$9.00 to \$10.00 per square foot and that income should be calculated into the least cost alternative. So the evaluation should include the cost of procurement, cost of dredging incremental increase, less the income received from disposal of the land. I do not see where any of this is addressed in this report in determining the Least cost proposal and must conclude that the study looked where and how much we must dig, where we can put, and how to comply with the environmentalists, and the endangered species. The only endangered species that was not addressed was the Farmer.

Had someone from the Corps contacted directly, I would have explained the details of berry farming and most likely avoided my property being considered as a potential site. However when the Port of Portland send me legal documents to sign in such a cavalier manner all it does is make me think its another land grab by the government, and makes me really upset. My property should not be considered to be used for Dredgings and is certainly not the least cost.

As for THE PORT OF PORTLAND, I hereby refuse to grant permission to enter my property and any representative of the Port of Portland, its contractors or assigns, entering my property will be guilty of Criminal Trespass and treated accordingly.

2. You are correct. However, in the FEIS, the Sauvie site has been dropped from further consideration as a disposal site.

3. Comments noted.

Yours Truly

Jerome D. Parson

Davis G Moriuchi
Deputy Dist. Engr.
Portland Dist Corps of Engineers
P. O. Box 2946
Portland Ore. 97208-2946

Oct 8, 1998

Dear Mr. Moriuchi;

I received your letter of Sept 29 1998 and this is the first information I received from the Corps or from Metro since I wrote to Metro and copied the letter to the Corps of Engineer.

At that time I indicated that it was it was an ignorant idea to consider my property as a suitable disposable site for dredging of the Columbia River.

The 48 acres you have identified includes the property the land that my personal residence occupies, along with the house for my workers, Barn, and several outbuildings.

The 36 acres just north of my property is planted with Marion Blackberries with underground Tiling and Irrigation piping. Between my property and the Sauvie Island Dike is approximately 4 acres of Raspberries with similar Irrigation and Tiles as are in the Marionberries. This property belongs to Mr. and Mrs. Hook and I currently lease from them. The surrounding land that is of the same level as my Marion field is owned by several other owners.

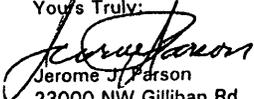
Farmland is limited (as they currently are not making any more of it) and very valuable. Not only is fertile Sauvie Island Farmland valuable for row crops it is very valuable for high value crops such as Berries.

I don't understand why you can possibly identify my property as a suitable disposal site considering all of the investment in a Berry field including the Plants, underground irrigation, underground tiling, posts and wires. This does not include the value of my house , Barn, and Outbuildings.

I recommend that you remove my property from consideration as a viable dump site for dredging, as discussion regarding the selection and identification of my property would most likely be an embarrassment to the Corp at the public hearing.

Please give this your consideration.

Yours Truly:


Jerome J. Parson
23000 NW Gillihan Rd
Portland Ore 97321

May 19, 1997

L. M. Patella
Manager, Navigation Division
Box 3529
Portland Or. 97208

I am in receipt of your letter of May 14 1997, Subject TEN YEAR CHANNEL DEEPENING STUDY-TEMPORARY PERMIT FOR SURVEY AND EXPLORATION. Along with your letter was two enclosures, one the Legal Document to be signed if permission were to be granted (which all sounds very benign), The second enclosure was DRAFT dated Dec. 19, 1 1996, which showed the Eastern part of my property, 48 acres as a **New Proposed Site** for dumping Dredging.

So 6 months ago some Dullard made the proposal to destroy 48 acres of some of the most fertile farm land in the Valley by dumping dredging on it and the rest of the bureaucracy agreed with it.

This was almost as stupid an idea as proposing the property adjacent to my South property line as a site for a 1600 bed Prison on Sauvie Island.

Apparently when I gave the U. S. Army Corp. of Engineers permission to enter my property last year, just as you have requested, they must have thought that was like a license to consider my property as a dump site.

In the last several years thousands of dollars have been invested in improvements to the berry fields alone. These 48 acres have underground Tiling, underground Irrigation, 36 acres of Marionberrys and my personal residence as well as Barns and Outbuildings.

By copy of this letter to the Chief, Real Estate Division, U.S. Army District, Portland, Permission Granted in 1996 to enter my Property is Hereby **Rescinded** and retracted and specifically **Denied**.

As for THE PORT OF PORTLAND, I hereby refuse to grant permission to enter my property and any representative of the Port of Portland, its contractors or assigns, entering my property will be guilty of **Criminal Trespass and treated accordingly**.

Yours Truly


Jerome J. Parson
23000 NW Gillihan Rd
Portland Ore 97231-1503

CC: Chief, Real Estate Division
U.S. Army Engineer District Portland
333 SW First Avenue
Portland Oregon 97208-2946

**CONSOLIDATED DIKING DISTRICT NO. 1
of Wahkiakum County
PO Box 624
Cathlamet, WA 98612**

January 29, 1999

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

Corps of Engineers Response

**Re: Columbia and Lower Willamette River
Navigation Channel Improvement Study**

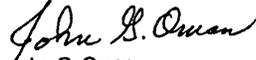
Dear Mr. Stevens:

Consolidated Diking District No. 1 of Wahkiakum County lies between river mile 39 and river mile 45 in the lower Columbia River basin. We have a problem near river mile 40.

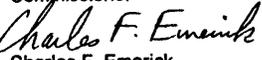
We have three (3) 72-inch tide boxes (located at WK station 546 + 08.7) that will not function due to river sand which has filled their outlets and Grove Slough. This sand has come into Grove Slough from the Columbia River due to the hydraulic action of the water moved by passing ships. These tide boxes were installed in 1976 and at that time there was very little river sand in the Grove Slough outlet area.

We, the Commissioners of Consolidated Diking District No. 1 of Wahkiakum County, feel that the function of these tide boxes is important to our internal drainage system and that any navigation channel improvements should include maintenance of the Grove Slough outlet.

Sincerely,


John G. Oman
Commissioner-Chairman


Philip A. Vik
Commissioner


Charles F. Emerick
Commissioner

The present deposition in the Grove Slough channel is not related to the proposed channel improvement project. Maintenance of the local flood control project is a local responsibility.

Feb 4, 1999

District Engineer:

The following is my feedback on the Corps of Engineers / Port of Portland plan to deepen 115 miles of shipping channel to 43 feet from the Pacific to Portland.

(1) You did not consider seriously the option for a regional Port bellow Portland. This violates NEPA. You state you will only be dredging sand and sediment. Not true... Solid rock in several areas was removed to get the Columbia to 40'. In several areas rock will have to be removed to get the Columbia to 43'. Plan for rock removal needs to be in EIS. How are you going to get the solid basalt rock out around Warrior Rock? Blast? We need to know. With a regional Port in Astoria, for example, it could soon be made to handle the 50-foot draft vessels existing today (43 feet is not enough). Is Oregon going to participate in deep draft shipping? Not in Portland. The Port of Portland and the Corps of Engineers are too tight possibly clouding Army Corps of Engineers judgement + objectivity. Just curious does the Corps plan to rent the Port of Portland Dredge to do work if deepening the Columbia/Willamette goes forward?

1. Please refer to our response to CREST and others regarding the regional port concept. Rock removal, potentially through blasting, is discussed in the EIS.

2 (2) Please do something useful with dredge spoils in the future. Creating the Zoo Achre Sand Island and the largest colony of Salmon-eating Caspian Terns in the World is not useful. Neither is spreading sand over 80 square miles of ocean killing ocean life. How about creating land for an Astoria Port with docks parallel to river flow?

3 I see more flaws with the current plan. I think this 115 mile project should be killed now and our time/money should be spent doing something better for Oregon's future.

Please contact me if you have any questions.

Shaun Maki
SHAUN MAKI
PO Box 247
Warrenton, OR 97146

4 P.S. where does a possible declaration of endangered species of salmon next month (March) fit into this plan? For example, blasting will not be permissible ... how will rock be removed?

2. Alternatives for disposal of dredged material, including potential for beneficial uses of the material has been thoroughly addressed in the report. Ocean disposal sites have been modified particularly in response to concerns of the crab fishing industry.

3. Comments noted.

4. The effects of the proposed action, including potential blasting, on listed salmonids are addressed in the EIS.

re: dredge spoil dumping

Corps of Engineers Response

Dear Steve:

My name is Dwight EAGER. I am a CRAB fisherman who has fished CRAB out of the port of Chizook for 25YRS. I am the owner/operator of a 38 foot CRABBOAT and fish primarily from the Ship Channel North to Long Beach from 4 fathom to 40 fathom.

Prior to the mounding problems our best and most accessible crab grounds in Dec. & JAN. were those which lie within Dump site B. We've been forced to change our fishing routine as a result of this problem & feel we suffered severe economic impact as a result of the irresponsible destruction of these CRAB grounds. This mound has not only caused us to lose a large area of our safest most accessible crab grounds in the winter months, but has also raised the danger and risk factors involved when attempting to fish when ocean swells are over the 10ft level.

Needless to say I am very skeptical of any dumping plan that allows dumping on our crab grounds. We have seen first hand the destruction it can cause, and felt the economic hardship which reckless dumping can cause.

1. One of the primary reasons for revising ocean disposal practices, including the need for larger sites, is to eliminate any further potential for site mounding and creation of the unsafe navigation conditions you have described.

1 We have also experienced the terror one feels on a small boat when an ocean swell begins to crest off shore in an area which should be a safe haven.

2 My personal feeling is that a direct placement onto Benson Beach allows the best alternative. The only site which doesn't interfere with our crab fishery and would allow ocean dumping in the close proximity to where site B is now would be south west of site B in an area named site 8 (mid channel by the Columbia River Buoy).

Please excuse the rough draft form but since time is of essence I'm forwarding my comments in this state.

Thank you for the opportunity to testify:

Sincerely,


Dwight Eager

PH. 360-777-8430

2. The proposed new ocean disposal sites have been selected particularly in response to concerns of the crab fishing industry.

Wm MARK HARRISON
FV KUBY SEA
20+ YEARS CRABBING

Date 2-1 78

(503) 861-2429 BOAT PH. 338-0569

Subj: Comments on Draft EIS/Feasibility Report - Columbia River
Navigation Project

I WOULD LIKE TO START BY SAYING I'M
AGAINST SPREADING THE SPOILS OVER A LARGE
AREA VERSUS SMALL. THE CRAB INDUSTRY IS
ONE OF THE LAST INCOME FISHERIES WE HAVE, TO
TAKE A CHANCE SPREADING DISPOSALS ALONG THE BEACHES
(WHERE SOFTSHELL CRAB COME TO MOLT DURING
SPRING & SUMMER AND SOMETIMES FALL IS A DEVASTATING
MISTAKE.

I HAVE FISHED ON THE SOUTH SIDE OF THE
RIVER FOR YEARS, I HAVE HAD CRABPOTS RIGHT ON
THE DRUDGE SPILL AREA SOUTH OF BOUY NO. 4. EVERY YEAR
IN FACT MY CRAB STRINGS HAVE LAID OVER THE SPILL
HUMP THAT HAS BEEN BUILT UP. ON EITHER SIDE
OF THE SPILL AREA THERE'S BEEN CRAB, BUT ON THE
AREA ^{ITSELF} THERE'S NOT. WHICH TELLS ME TWO THINGS,
THAT THE DISPOSALS HAVE MADE A DEAD ZONE WHERE
THE CRAB DON'T WANT TO BE, OR THE FEED HAS
BEEN CHANGED.

TO SPREAD THESE SPOILS OVER A BIGGER
AREA MAY, AND IN MY OPINION, WILL WIPE OUT
OUR FISHERY. YOU CAN'T TAKE THE CHANCE ON
BANKRUPTING US FISHERMEN.

Corps of Engineers Response

1. The larger North and South sites proposed in the draft report are no longer being considered as disposal sites. The proposed new site is smaller and located further offshore. This change was made primarily in response to concerns of the crab fishing industry.

THE TEST THAT WAS CONDUCTED ON THE
AFFECTS OF SPOILS ON CRAB ISNT GOOD
ENOUGH, TO THINK THAT 30% MORTALITY
1 WASNT TO BAD IS ABSOLUTLY UNEXCEPTABLE.

ITS MY PERSONAL OPINION THAT THE
DISPOSAL AREA NEEDS AND MUST BE IN
DEEP WATER, AND ALSO IN A SMALL
AREA, SO IT CAN BE REGULATED TO CHECK
PROBLEMS WHICH MAY ARISE FROM IT.

MARK CHARLTON
CREW CHIEF
11/27/98

February 3, 1999

The District Engineer
U.S. Army Corps of Engineers
Portland District

Attention: CENWT-EC-E

P.O. Box 2946
Portland, OR. 97208

Note to Colonel Robert T. Slusar:

This is an urgent request to reconsider deepening channel to 43'. The extra 3 feet will not accomplish very much in the Long Run. Ships will be getting bigger and will need deeper water; so it will just be an expensive exercise in futility. There must be a better way, such as a Lower Columbia Port Authority.

Signed: Concerned Citizens

Nancy Grimberg
2551 Irving Ave.
Astoria, OR. 97103
and

Walt Larson
35704 Lindberg Lane
Astoria, OR 97103

Comments noted. See previous responses to CREST and others.

Colonel Robert Stusar,

We are strongly opposed to dumping of dredge spoils on the crab grounds around the Columbia River. Many livelihoods are at stake, most of which are displaced salmon fishermen, who have already payed for past mistakes with jobs already.

With a little vision and ambition, all concerned could be satisfied with the obvious choice of expanding the Astoria port to accomodate the larger vessels. Instead of being Portland's dormnet this area could actually get an economic boost instead of taking in the shorts for their gain.

The only other possibility is to take the spoils as far offshore as possible to minimize the damages that will only become obvious to the Corps over time. This is how the Army Corps of Engineers has gotten its education in the past and we have payed its tuition.

Thank you,
George Merrin

The proposed ocean disposal sites have been revised particularly in response to concerns of the crab fishing industry. See previous responses to CREST and others regarding the regional port concept.

To Steven J. Stevens,

Jan 23, 1999

IN REGARDS TO The USACE Plans to Deepen 115 Miles of the Lower Columbia Rivers and Willamette Rivers including the Portland Harbor.

I am opposed whole heartedly to this issue.

There is no possible way that you can convince me that these projects will Benefit the Rivers, The Fish and the Ecosystems of These Waterways.

To Deepen a river is an absurd idea.

Comments noted

I Strongly Recommend that the USACE Cancel Any Plans to Deepen The Willamette and Columbia Rivers

Sincerely,

Scott Metzger

P.O. BOX 999

CORDOVA, AK

99574

Corps of Engineers Response

The following responses are offered to address the comments in the form letters that follow.

Paragraph 1. Comments noted. All conclusions in the EIS are based on the best scientific information available for a given issue.

Paragraph 2. The material proposed to be dredged from the Columbia River is the same material that is currently dredged for maintenance of the existing 40-foot channel. This material has been tested and evaluated, and is primarily sand and has a low percent of fines and organic material due to the constant reworking of the sediments by large flows in the Columbia River. Deepening of the channel in the Columbia River will not uncover or expose any material that is different from the material now dredged.

A Tier I evaluation was made regarding radionuclides in the project area. Based upon this analysis no testing at higher tiers was considered warranted. A "reason to believe" was not established that current levels of radionuclides pose a threat. The Bi-State found that there were similar levels of radiation in lower river sediments as in sediment above Hanford. Bioassays (Tier III) would be conducted on all sediments that contained contamination above screening levels if proposed to be dredged and placed into open-water unconfined. No sediment in the Columbia River had any contaminant at levels above screening levels so biological testing of these sediment is not necessary to determine the suitability of the material. Sediment in the Willamette River does have contamination above screening levels. Prior to dredging, these materials would require higher levels of testing if the material were to be dredged and placed in an unconfined open-water disposal site.

Resuspension and redistribution of contaminants would be of concern in only limited areas of the Willamette River which contain high levels of contamination. The local sponsor has requested that dredging of the Willamette River be delayed in order to allow coordination with the ODEQ investigation and remediation planning for the Portland Harbor. No further Corps studies of Willamette River sediments are anticipated prior to completion of the remediation plan. Further sediment quality evaluations will be required and conducted prior to any dredging and disposal activities. The Corps has and will continue to participate in USEPA's and ODEQ's efforts to clean up the Willamette River.

Paragraph 3. Alternative dredging methods are discussed in the EIS. The final dredging plan for construction will be developed to minimize impacts to species of concern. See our response #2 to the US Department of Interior letter regarding LoadMax. Additional information has been added to the FEIS concerning LoadMax and the regional port analysis.

Paragraph 4. Legal requirements under NEPA, the Clean Water Act, the ESA and many others were thoroughly addressed in the EIS. A detailed discussion of the impacts of the proposed project on listed species, especially salmonids, was provided in both the EIS and Biological Assessment submitted to the NMFS under the Endangered Species Act requirements. This includes discussion of work outside of the normal in-water work windows. The NMFS determines Section 7 compliance of the proposed project. As described in the EIS, the project is not expected to have a significant impact on salmonid populations in the river. The Corps coordinated with both WDFW and ODFW to determine appropriate salmon restoration measures to be implemented under ecosystem restoration. We have prepared a Biological Assessment for salmonid species and are currently seeking concurrence from the NMFS through their Biological Opinion. The USFWS, in cooperation with WDFW, ODFW, and NMFS, has prepared a Coordination Act Report with specific recommendations on natural resources and project-related impacts.

The proposed action does not involve treaty lands. Treaty Tribes and non-treaty Tribes potentially affected by the proposed action were contacted and their comments requested.

Dioxin testing was conducted as part of the October 1991 Columbia River Channel Deepening Reconnaissance Report and a P450 dioxin screening test was conducted during this feasibility study. See response in paragraph 2 regarding radionuclides. Sediments were chemically tested for PAHs, see Appendix B.

Paragraph 5. Additional information has been added to the FEIS on Dungeness crab and the commercial crab fishery. Further workshop meetings have been conducted for ocean disposal since release of the DEIS, and the disposal plan in the FEIS has been changed to minimize impacts to the commercial fishery, including crabs. The EIS has been revised to reflect this information.

The EIS addresses impacts to sturgeon and salmon in detail. The Corps has agreed to conduct a study of the deep disposal site to assess the benthic productivity in this area. Additional information on sturgeon use of deep water areas in the lower river also will be obtained during the benthic invertebrate study. This study also will determine sturgeon use by season and age group in one of the deeper areas of the Columbia. This information will be used to design a disposal plan that minimizes disposal impacts to larval and juvenile sturgeon.

District Engineer, U.S. Army Corps of Engineer District, Portland
Attn: CENWP-EC-E
P.O. Box 2946
Portland, Oregon 97208-2946

January 29, 1999

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The sediment issues especially in regards to the Willamette River have not been adequately addressed or studied as required by the Clean Water Act. Direct dioxin and furan testing should be done on all sediments in both rivers both prior to and during any dredging activities. The entire chemical testing must also include metals, pesticides and PCB's. There is a very real possibility of dredging into a pocket of radioactive materials deposited from Hanford activities and it is not sufficient to use the small amount of past sampling to say all sediment is free from Hanford contamination. You must also address additive and synergistic effects from contaminants in the document. The screening levels do not provide a risk free environment. A comprehensive risk assessment should be done at least for the fish and wildlife of the river and preferably for human health including subsistence and indigenous populations. This risk assessment must take into account the synergistic and additive effects from the contaminant levels already found in both river's sediment. It should look at possible effects on mink and bald eagles, salmon and surgeon as well as other threatened or listed species.

Alternatives to dredging must be explored in much greater detail. There are preferable alternatives that do less environmental damage and offer better cost to benefit ratios when you include the total costs for maintenance. The non-structural alternative and the deep water port for Astoria are two that are not adequately discussed and would be preferable for the river's ecosystem and the lower river economy. Economic impacts to the population below Longview must also be discussed.

Legal requirements need to be dealt with more thoroughly throughout the document. It appears to violate NEPA by not considering all alternatives adequately. The Clean Water Act requires adequate sampling which logically would include dioxin and radioactive testing. The PAH screen is not enough, when the Bi-State testing showed significant toxic levels of dioxin in all sediment tested in 1991. Your proposal also violates the ESA by not abiding by the suggested work windows for salmon and endangered species. The loss of habitat and riparian zone is not justified by the benefits, which could be marginal at only 43 feet. There needs to be an assessment of impacts to Treaty Rights.

The impacts to the crab fishing industry are significant and must be explored in depth with monitoring and mitigation in place before the project begins. The ocean disposal proposal must assess impacts to the entire ecosystem. The Batelle Study must be fully included in your document showing the true impacts to crabs of up to 80% mortality. Impacts to sturgeon from entrainment are significant. Finally, you must prove that the impacts to salmon would not be increased. Logic points otherwise.

Sincerely,

Dave Frouh

Address: 384 hemlock
Goldendale, Wg. 98620

Other

Comments:

*Serious Stuff here guys. Lets get it together,
facts that is, and who benefits. Not the general
populace*

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Sincerely, JAY CARROLL

J Carroll

Address: P.O. BOX 323
BINGEN, WA

18 YEARS
ON THE
COLUMBIA

Other

Comments: A DEEP WATER PORT IN ASTORIA IS MUCH MORE ECOLOGICAL AND ECONOMICAL ALTERNATIVE. TO DREDGE FOR DREDGING SAKE IS A WASTE OF NEEDED DOLLARS.

THANK YOU

J Carroll

District Engineer, U.S. Army Corps of Engineer District, Portland
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P.O. Box 2946
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Sincerely,

Address:

Ann Lurie
6083 Hwy 35
1117 Hood, OR 97041

Other

*Comments: Wetlands need to be protected and created - not destroyed.
Please explore all options and even try them before any major dredging
or blasting begins.*

District Engineer, U.S. Army Corps of Engineer District, Portland
Attn: CENWP-EC-E
P.O. Box 2946
Portland, Oregon 97208-2946

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Sincerely,



Address:

P.O. Box 196
Hudson, WA 98623

Other
Comments: _____

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Attn: CENWP-EC-E
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Sincerely,

Deidre Duffly
Michael Kohler

Address:

Box 152
Huson, WA
98623

Other
Comments:

*Think about the future - look at what not thinking about it
has brought us → Y2K bug - nuclear wastes we don't
know what to do with - etc ... etc etc*

District Engineer, U.S. Army Corps of Engineer District, Portland
Attn: CENWP-EC-E
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Sincerely,

Mary Preston

Address:

*77 Pearce Rd
White Salmon, WA 98672*

Other
Comments: _____

District Engineer, U.S. Army Corps of Engineer District, Portland
Attn: CENWP-EC-E
P.O. Box 2946
Portland, Oregon 97208-2946

January 29, 1999

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Sincerely,

Kent Olson

Address:

*P.O. BOX 196
Husum WA 98623*

Other

Comments: _____

District Engineer, U.S. Army Corps of Engineer District, Portland
Attn: CENWP-EC-E
P.O. Box 2946
Portland, Oregon 97208-2946

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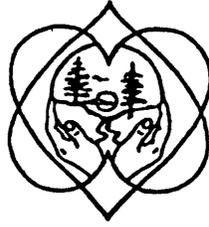
Sincerely, *Raymond E. Mitchell*
Director, *Sacred Earth Foundation*

Address: *401 EKORE RANCH*
Goldendale, WA
98620 -

Other
Comments: *Please do what is best for public's*
environmental health. It is past time that this becomes
our main concern.

Thank you!

sacred earth foundation



A Community Stewarded Land Trust
Preserving and Protecting our Earth with Reverence

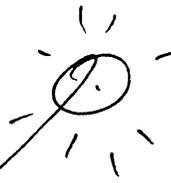
Save our Fish!

Save our life!

Do what is Right!

We the people, Thank you!

Blessings

Ray 

Inspired Living - Amidst the Trials of Time

401 Ekone Ranch Road • Goldendale, Washington 98620

Phone: (509) 773-4536 • Fax: (509) 773-5554

www.zerocircles.com/ekone.htm

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Portland, Oregon 97208-2946

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Sincerely,

James F. Mc Cormick

Address: 53 Little Mountain Rd.,
Front Lake WA 98658

Other

Comments: *The points raised above are extremely important and must be addressed to the satisfaction of all affected parties: wildlife, environmental legal, treaty issues all must be addressed thoroughly and satisfactorily before this project goes forward. Rushing ahead will only bring about legal action and needless expense. Please carefully look into the issues being raised here.*

Sincerely, James F. Mc Cormick

District Engineer, U.S. Army Corps of Engineer District, Portland
Attn: CENWP-EC-E
P.O. Box 2946
Portland, Oregon 97208-2946

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Sincerely,

Terry Haba

Address:

*PO Box 151
Mosier, OR 97046*

Other

Comments: _____

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Sincerely,

Lana Smoller Rockwell

Address:

*P.O. 324
White Salmon, WA. 98672*

Other

Comments: _____

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Sincerely,

Meredith Hart
Meredith Hart

Address:

*2112 Proctor Rd,
Mosier, OR 97040*

Other

Comments: _____

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Sincerely,

Mike Moshofsky
Mike Moshofsky

Address: 2112 Proctor Rd.
Mosier, OR 97040

Other

Comments: One more opposition letter to this madness.

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Attn: CENWP-EC-E
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Sincerely,

Address:

Adrienne Burton-Jones

*1702 ESTHER WAY
The Dalles, OR 97058*

Other

Comments: _____

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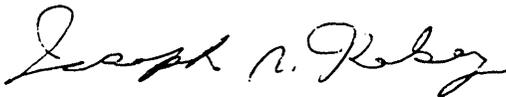
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Sincerely,



Address:

1405 TAYLOR ST
HOOD RIVER OR
97031

Other

Comments: _____

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Sincerely,

*Susan Rae Hartford
Patricia J. Hartford
Edith M. Hartford*

Address: 3580 THOMSON RD
HOOD RIVER, OR. 97031

Other
Comments:

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January 29, 1999

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I wish to comment on the Integrated Feasibility Report for Channel Improvements and Environmental Impact Statement recently offered by the Corp for public comment. The purpose of this study and proposed action is to deepen and widen the channel. All pretense that it is to benefit the environment should be deleted including the listed dual purpose, "...to provide ecosystem restoration for fish and wildlife habitat." It will significantly impact the environment and the economy of the lower river and statements throughout the document that state otherwise should be deleted or referenced and documented. Summary statements of no impact are not based on sound science.

The sediment issues especially in regards to the Willamette River have not been adequately addressed or studied as required by the Clean Water Act. Direct dioxin and furan testing should be done on all sediments in both rivers both prior to and during any dredging activities. The entire chemical testing must also include metals, pesticides and PCB's. There is a very real possibility of dredging into a pocket of radioactive materials deposited from Hanford activities and it is not sufficient to use the small amount of past sampling to say all sediment is free from Hanford contamination. You must also address additive and synergistic effects from contaminants in the document. The screening levels do not provide a risk free environment. A comprehensive risk assessment should be done at least for the fish and wildlife of the river and preferably for human health including subsistence and indigenous populations. This risk assessment must take into account the synergistic and additive effects from the contaminant levels already found in both river's sediment. It should look at possible effects on mink and bald eagles, salmon and surgeon as well as other threatened or listed species.

Alternatives to dredging must be explored in much greater detail. There are preferable alternatives that do less environmental damage and offer better cost to benefit ratios when you include the total costs for maintenance. The non-structural alternative and the deep water port for Astoria are two that are not adequately discussed and would be preferable for the river's ecosystem and the lower river economy. Economic impacts to the population below Longview must also be discussed.

Legal requirements need to be dealt with more thoroughly throughout the document. It appears to violate NEPA by not considering all alternatives adequately. The Clean Water Act requires adequate sampling which logically would include dioxin and radioactive testing. The PAH screen is not enough, when the Bi-State testing showed significant toxic levels of dioxin in all sediment tested in 1991. Your proposal also violates the ESA by not abiding by the suggested work windows for salmon and endangered species. The loss of habitat and riparian zone is not justified by the benefits, which could be marginal at only 43 feet. There needs to be an assessment of impacts to Treaty Rights.

The impacts to the crab fishing industry are significant and must be explored in depth with monitoring and mitigation in place before the project begins. The ocean disposal proposal must assess impacts to the entire ecosystem. The Batelle Study must be fully included in your document showing the true impacts to crabs of up to 80% mortality. Impacts to sturgeon from entrainment are significant. Finally, you must prove that the impacts to salmon would not be increased. Logic points otherwise.

Sincerely,

Mark H. Hickman

Address: 500 May St.
Hood River, OR 97031

Other
Comments: _____

District Engineer, U.S. Army Corps of Engineer District, Portland
Attn: CENWP-EC-E
P.O. Box 2946
Portland, Oregon 97208-2946

January 29, 1999

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Sincerely,

*Jane Camero
Jane Camero*

Address: *1027 Columbia St
Hood River, OR 97031*

Other

Comments: _____

Stevens, Steven J NWP

From: md [md@gorge.net]
Sent: Thursday, February 04, 1999 3:50 PM
To: Steven.J.Stevens@usace.army.mil
Subject: Channel Deepening Project

I have just finished reviewing the Columbia River Channel Deepening Summary sheets and feel that the environmental impact caused by the proposed deepening would be too severe. There are also many concerns relating to local economies that I do not feel have been adequately addressed. This project should not go forward!

Thank you for your attention,
Margo Dameier
Hood River, OR
md@gorge.net

Corps of Engineers Response

The following letters support the 43-foot channel deepening alternative citing the cost savings achieved through increased shipping efficiency and its importance to the regional economy, comments noted.

Port of Portland
Columbia River Channel Coalition
Interstate Columbia River Improvement Project
Port of Vancouver
Port of Woodland
Port of Pasco
Port of Longview
Port of Coos Bay
Port of Kalama
Washington Public Ports Association
Cowlitz Economic Development Council
Portland Chamber of Commerce
Columbia Pacific Building and Construction Trades Council
Kalama Export Company
Gard Strang Edwards & Aldridge, Inc.
Lower Columbia Contractors Association
Cowlitz-Wahkiakum Counties, Washington Labor Council
Columbia River Economic Development Council
Oregon Wheat Commission
Pacific Coast Metal Trades District Council
Stevedoring Services of America
Edward M. Jones and Company
Diatect International Corporation
Oregon Wheat
Clayton-Ward Co.
Menasha Corporation
Anderson Hay & Grain Co.
Pacific Rim Trade Association
Geo. S. Bush Co., Inc.
Sharp Microelectronics Technology, Inc.
Columbia Corridor Association
BHP Coated Steel Corporation
Columbia Grain, Inc.
Columbia River Customs Brokers & Forwarders Association

Jones Stevedoring Company
Bernert Barge Lines
Vancouver Chamber of Commerce
Oregon Potato Commission
United Grain Corporation
Oregon Public Ports Association
Pacific Northwest Waterways Association
Schnitzer Steel Industries, Inc.
W.G. Moe & Sons
Building and Construction Trades Council
Peterson & Associates, P.S.



Port of Portland

Box 3529, Portland, Oregon 97208, U.S.A.
503/231-5000

February 5, 1999

District Engineer
U.S. Army Corps of Engineers District, Portland
Attn: CENWP-EC-E
P.O. Box 2946
Portland, OR 97208-2946

Dear Sir:

The Port of Portland is a limited-purpose regional government charged with facilitating the maritime, shipping, aviation, commercial and industrial demands of residents in Multnomah, Washington, and Clackamas Counties, Oregon. The Port's primary mission is to provide competitive cargo and passenger access to regional, national, and international markets. Its secondary mission is to respond to rapid growth and promote stability in industrial and commercial enterprises in the region, and in so doing, to help create and retain quality jobs. Deepening the Columbia River Navigation Channel is a key improvement that will allow the Port to meet its mission into the future.

Located at the only point in the Pacific Northwest where deep-water shipping, upriver barging, two water-grade rail lines and the Interstate highway system meet, Port marine terminals, rail lines, roadways, and airports provide a superior, seamless, and free-flowing transportation environment that serves the Portland/Vancouver region and much of the North American continent. The existing deep-draft navigation channel, constructed and maintained by the U.S. Army Corps of Engineers, with the Port of Portland as a local sponsor, is the infrastructure that enables international trade to flourish in our region.

In terms of cargo tonnage handled, the Port's seaport is the second largest of its kind on the U.S. West Coast, after Los Angeles/Long Beach, and the largest in the Pacific Northwest. Its prominence is based on bulk grain and mineral exports (64 percent of Port's total tonnage), containerized agricultural, forest product, and manufactured goods (29 percent of total tonnage), breakbulk steel and forest products (4 percent of total tonnage), and automobile export/import traffic (4 percent of total tonnage). These cargoes originate from or are destined to nearly every northern tier American state and Canadian province. Portland is the largest wheat export port in the U.S. and, combined with other Columbia River ports, constitutes the second largest grain export center in the world. On average, 7 million tons of grain—mostly wheat and barley—flow through Portland annually to markets throughout Asia and the rest of the world. Portland's significance as a bulk mineral export location is also growing as bulk mineral exports from producers in Wyoming and other mountain states and Canada have increased ten-fold in the past decade.

Port of Portland offices located in Portland, Oregon, U.S.A.
Chicago, Illinois; Washington, D.C.; Hong Kong; Seoul; Taipei; Tokyo

District Engineer
Page 2
February 5, 1999

Since its creation more than a century ago, the navigation channel and adjacent marine facilities of the Port of Portland have contributed to the economic well being of Oregon and the Columbia-Snake River region. The community benefits derived from Port-related business maritime activities include:

- Influencing the creation and/or maintenance of more than 60,000 regional jobs.
- Generating \$723 million annually in business revenues for firms providing goods and services related to Port business activities.
- Supporting some \$232 million annually in worker salaries.
- Producing an estimated \$54 million annually in state and local income tax revenues.

Portland has become a manufacturing and exporting center that far surpasses its relative population. This fact is demonstrated by comparing Portland with other U.S. cities:

- 10th largest exporter in the U.S.
- 20th largest manufacturing center.
- 2nd largest wholesale/distribution center on the West Coast behind Los Angeles in value of wholesale trade.
- Portland has three times the value of L.A.'s wholesale trade on a per capita basis.

The economic base of the Portland/Vancouver region is highly transportation/trade dependent. Access to the global marketplace for both Washington and Oregon businesses is critical for the economic vitality of the region. One in five jobs in the region are export dependent. Firms engaged in export trade pay their employees 12 percent to 18 percent more than firms not engaged internationally.

COMPETITIVE MARKET ACCESS

In a recent survey, over 900 companies in Oregon and Washington that export or import products used the Port of Portland's marine container, grain, and breakbulk facilities to reach their international markets. Of these, 625 were located in the Portland/Vancouver metro area and 212 were in the Willamette Valley and Oregon's eastern, southern, and coastal areas (54 could not be assigned a specific location).

Large and small companies alike, such as Lamb Weston (french fries exporter), Pendleton Grain Growers (wheat and barley exporter), Avison Lumber (lumber products exporter), International Paper (paper products exporter), Pacific Seed (grass seed exporter), and West Salem Machinery (machinery parts importer) used Port transportation facilities to support their business throughout the state and region.

Portland's role in the container trade is particularly critical to keeping Oregon companies competitive. Of the 836 Oregon firms using the Port, most rely specifically on the container services provided at Terminal 6. Currently, Terminal 6 handles 60 percent to 85 percent of Oregon's container traffic. The balance is diverted over the road to Seattle or Tacoma. The Port has heard from shippers as well as carriers that a deeper-draft channel isn't simply a competitive concern, but is vital to their livelihoods and continued operating presence in Oregon. On an annual basis, Portland's presence in the container business saves Oregon companies about \$50 million per year on extra over-the-road truck and rail costs. Draft restrictions in the existing 40-foot channel have already caused the loss of some service from Terminal 6 since this feasibility study began in 1994. In order to remain competitive, the Port must be able to provide for the deeper-drafting vessels in the container trade. Consequently, we strongly support the Corps' findings contained in the Feasibility Report to deepen the navigation channel to 43 feet.

ASIAN ECONOMIC CHALLENGES

The Asian "flu" that began last year has significantly reduced demand for many traditional Pacific Northwest exports, especially its top three categories: forest products, grain, and high technology. This has had a large short-term effect on cargo volumes originating from the harbor, due to our role as export gateway to the Pacific rim.

- Approximately 76 percent of waterborne trade from the Columbia-Snake River Customs District by tonnage, and 92 percent by value, is with Asian Pacific Rim nations.
- \$1 billion of exports generates 15,000 jobs. In 1997, \$13 billion worth of goods to foreign markets passed through the Columbia/Snake Customs District. These figures don't include the growing volume of service exports, such as software and environmental technology.
- In terms of oceanborne trade, the top five nations or market areas most important to the Columbia/Snake Customs District importers and exporters, in order of priority, are: Japan; China/Hong Kong; the ASEAN nations (Indonesia-Malaysia-Philippines-Singapore-Thailand); Korea; and Taiwan.

We believe that the current economic difficulties in Asia, while having a discernible impact on recent trade volumes, will not be long-lasting. This viewpoint is shared by virtually every economic forecasting group. Indeed, there are strong indications that the worst of the crisis has already passed and that the decline in export trade has ceased and perhaps trade has even started to grow again. This trend is reflected in the performance of the lower Columbia River container and grain businesses in the latter part of 1998.

Waterborne cargo growth has been steady in the Portland harbor and is projected to increase dramatically as the region grows. As part of its 2040 planning, the Metropolitan Service District has recently developed freight forecasts for the Portland Metropolitan Region which anticipate a tripling in the volume of international exports and imports by the year 2030. Channel deepening will allow the Port to meet that need by allowing vessels in service today and those not yet built, to transit the river and call our port in the years to come.

WEST HAYDEN ISLAND

Comments were made at the public hearing on the DEIS that deepening the channel will somehow promote or cause the Port of Portland's West Hayden Island marine terminal development to proceed. The Port of Portland acquired West Hayden Island in 1993 based upon studies showing a need for marine waterfront land in the Portland Harbor. This need exists whether or not the channel is deepened. In addition, if West Hayden Island is developed it will not change in any way the environmental impacts of the proposed channel deepening project. As you know, the impacts are being addressed in a separate environmental impact statement for which the scoping notice was published in October 1998.

ENVIRONMENTAL CHALLENGES

The Port of Portland understands that protecting the environment is more than a matter of meeting regulatory requirements. Sound environmental practices include being a good neighbor in the community and the region, meeting customer needs and fulfilling the Port's business mission in an environmentally responsible manner.

We have worked with the Portland District of the Army Corps of Engineers to assure that the channel deepening can be undertaken in a way that meets these environmental challenges. In most areas the proposed project as described in the draft EIS has met our requirements, and where we have differed, we have developed alternative sites (the sponsors' plan) with two primary objectives:

1. To avoid impacts to farmland and natural resources, if possible, by moving the dredged sand further distances to appropriate sites
2. To move the dredged sand to locations where it can be beneficially used.

As a result, the sponsors' plan will have less impact on wetlands and about half the impact on wildlife resources and the corresponding mitigation requirement of the government's least cost plan. We recommend that the Corps adopt the sponsors' plan in the final EIS because of its reduced impact on the environment.

THE FUTURE

The region will be grappling with tough economic and environmental challenges for some time to come. But the region will face opportunities as well.

By 2040, there will be 720,000 new residents in the region. Exports are projected to triple. Capacity at Terminal 6 for containers will be exceeded in about 2010. The need for modernization and rail efficiencies could require new grain and mineral export facilities as soon as 2005.

The Portland/Vancouver region has been dealt one of the best possible hands for playing the game of international trade:

- A deep-draft navigation channel to the ocean that is the most direct doorway to Asia.
- Land capacity for future marine terminals adjacent to the channel.
- River-grade rail and interstate routes through the Cascade mountains.
- Competing national railroads calling on the region, both also competing with barge operators.
- A 400-mile waterway link to inland sources of traded products.
- North-South and East-West interstates intersecting here.
- Considerable rail, barge, and ship capacity to handle cargo growth with minimal additional environmental impacts.
- A healthy trade-sector manufacturing and services base.

WILLAMETTE RIVER

Exports from grain elevators on the Willamette River make the Portland Harbor the single largest wheat port in the U.S. Additionally, several major facilities importing and exporting other bulk cargoes are located in the Portland Harbor. With the trend towards moving all bulk shipment in Panamax-sized bulk vessels due to their greater efficiency, we are certain that deepening the Willamette section of the navigation channel will provide significant navigation benefits and such a deepening supports investments already in place. However, sediment issues in the Portland Harbor are currently under review and remain unresolved.

Phasing the deepening of the Willamette River segment would allow time for careful examination of the management of Willamette River sediments without delaying the Columbia. Providing added time for a more comprehensive approach on the Willamette segment of the channel may also present an opportunity to link Portland Harbor River cleanup efforts by the state of Oregon with the deepening of the Willamette River portion of the channel.

The region urgently needs to move ahead with deepening the Columbia River segment to match the increasing size of vessels moving in today's waterborne commerce. We see this as a key to improving the competitiveness of U.S. products in world markets. Similarly, we need to assure that agreement is reached with our stakeholders on how to improve navigation on the Willamette, so that the significant navigation benefits from implementing this project can be realized.

Before developing a recommendation on the manner in which the Willamette segment should be incorporated into the overall project, we request that we be allowed to review comments received by the Corps on the Willamette River deepening plan contained in the DEIS so that we may work with you to address public concerns and project needs.

DREDGE OREGON

The authorizing language for the existing 40-foot channel requires that the Port of Portland provide a pipeline dredge, on a reimbursable basis, to the Corps of Engineers for maintaining and improving the navigation channel. The Port of Portland's hydraulic, cutterhead, pipeline dredge OREGON is used to fulfill this requirement. The OREGON is used primarily for maintaining the navigation channel under contract to the Corps of Engineers although the dredge is also used for land reclamation which has resulted in creation of many of the port and industrial lands on the Columbia and lower Willamette system for port and public agencies on both the Oregon and Washington sides of the river.

Paragraph 2.4.1.2 in the feasibility report states that "About 2mcy of material per year are dredged by pipeline dredges, nearly all by the Port of Portland's 30-inch dredge OREGON." Initial results from an independent study commissioned by the Port of Portland, using current data generated by the Corps of Engineers, shows that for the last four years (July 1, 1994 - June 30, 1998) the OREGON dredged approximately 16 mcy from the channel under its contract with the Corps for an annual average of 4 mcy. In addition, the Port's study indicates that the OREGON unit dredging costs are at least 21 percent less than unit dredging costs in the Corps' cost estimating dredging program for a similar sized dredge. This reinforces the fact that the OREGON continues to be the most-cost effective pipeline dredge for the Columbia River. With the shift to more upland disposal in channel maintenance and channel deepening, there will be an increased role for pipeline dredging in the future. For these reasons, we recommend that the requirement for the Port of Portland to provide a pipeline dredge to the Corps be carried forward into the authorizing language for the new 43-foot channel.

District Engineer
Page 7
February 5, 1999

ECOSYSTEM RESTORATION

In addition to our commitment to the region's economic future through channel deepening, the Columbia River ports are also committed to completing the ecosystem restoration component of the project. From the initial planning stages we recognized our responsibilities as project sponsors to demonstrate a commitment to not only mitigate for environmental impacts but also, where practical, improve or restore the natural environment. We are pleased with this opportunity to show our commitment and to move forward in a partnering effort with the Corps of Engineers on this important environmental project.

In conclusion, we urge the Corps to move forward expeditiously and incorporate the sponsors' plan in the final EIS so that this critical project can be authorized and constructed as quickly as possible.

Yours very truly,



Mike Thorne
Executive Director

February 3, 1999

U.S. Army Corps of Engineers, Portland District
CENWP-PB-E Attn: Steven J. Stevens
P.O. Box 2946
Portland, Oregon 97208-2946
FAX: 503 808 4805

RE: Comments on Draft Integrated Feasibility Report for Channel Improvements and Environmental Impact Statement (DEIS)

These comments are on behalf of the Columbia River Channel Coalition, representing over 70 organizations in Oregon, Washington, Idaho, Montana and states east, who are working to build public consensus for an economically viable and environmentally sound plan to deepen and maintain the Columbia and Willamette deep-draft federal navigation channels. As ships become larger, it is vital to our future to be able to accommodate these vessels. Our trade base not only helps grow existing industries and companies, it provides current and future workers with the opportunity to prosper with quality jobs. Looking to the future, the channel improvement project will help the Northwest retain and attract businesses compatible with our environment and community objectives while providing efficient infrastructure to move regional products to world markets.

The Columbia River port system provides a strategic trade corridor for the nation to move products to world markets. As the second largest grain handling and shipping system in the world, it is vital to providing continued competitive access for U.S. producers, manufacturers and shippers. In 1997, the lower Columbia handled 40% of U.S. wheat exports totaling approximately 13 million tons. Trade plays an integral role in the economy of Oregon and Washington and the ripple effects of trade extend throughout the Northwest and into surrounding states.

Support for the 43-foot alternative.

For all of the reasons cited above, we support deepening the channel to 43 feet as the best alternative in the DEIS. This option would provide the draft necessary to meet the requirements of ships now leaving light-loaded from the Columbia River as well as assure adequate depth needed for the new larger bulk, breakbulk and container vessels being built to meet changing needs in the import/export business. Over time, if we lose the ability to accommodate more efficient vessels, we will see our economy atrophy. The DEIS estimates annual transportation savings for the 43-foot alternative at \$39 million. This transportation efficiency will help U.S. growers, producers, manufacturers and shippers to be competitive in world markets.

Support for the strategy of reduced environmental impacts.

The DEIS outlines new strategies to meet environmental concerns throughout the project area. The proposed reduction in beach nourishment to meet environmental objectives including protection of fish habitat, while providing long-term reduction in the overall dredging and maintenance required for the

Columbia
River



Channel
Coalition

Founded by
Lower
Columbia River
Maritime
Ports

Oregon
Port of Astoria
Port of Portland
Port of St. Helens

Washington
Port of Kalama
Port of Longview
Port of Vancouver
Port of Westport

6200 N. Ensign St.
Portland, OR 97217 USA
Tel: (503) 285-6343
Fax: (503) 285-6350

shipping channel, is a sound approach. This strategy contributes to regional efforts to protect endangered fish species. With this strategy, there are environmental benefits over current practice and reduced maintenance and costs over the life of the project. Additionally, we recognize the importance of environmental sensitivity to meet community concerns in a project of this magnitude and appreciate the efforts by the Corps of Engineers to involve the public in the feasibility study.

Support for the Sponsors' Preferred Alternative Disposal Plan.

We urge adoption of the Sponsors' Preferred Alternative Disposal plan. This alternative set of disposal sites would reduce impacts on farm and resource lands, substituting transportation costs for environmental costs and impacts. The sponsors' preferred alternative would make beneficial use of a majority of the material from construction of the project, utilizing Columbia River sand for port purposes and other beneficial uses. Ninety percent of the new upland sites proposed by the sponsors are industrially zoned or are active aggregate sites. Even though this alternative costs the sponsors an additional \$5 million over the statutorily required Least-Cost Plan, it achieves additional environmental benefits and is responsive to community concerns that have arisen over the course of the Feasibility Study.

Support for Additional Site to be included in the Sponsors' Preferred Alternative Plan. We respectfully request the Corps consider the addition of a beneficial use site to the Sponsors' Preferred Alternative Plan at W33.4. This site has been operated and managed by the Port of Wahkiakum 2 and provides beneficial uses to the community. The Port recycles and sells the material providing benefits to the district as well as providing quality material for construction in the area. The addition of this site would add flexibility to maintenance and operation of the channel over time as well as beneficial use of the material in the community.

Support for Advancing Construction of the Proposed Project.

We respectfully urge the Corps to move ahead with the Columbia River segment of the project and portions of the Willamette which are not in the area of environmental concern as early as possible. Prompt action here is a key to enhancing the competitiveness of U.S. products. The proposed 43-foot alternative with the Sponsor's Preferred Alternative Disposal Plan provides a sound, environmentally sensitive, project proposal that meets national and regional economic objectives.

Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project. If it is possible to move ahead with deepening portions of the Willamette as part of the early construction of the project without jeopardizing the comprehensive effort to clean up the Portland Harbor we urge you to do so. For example, Columbia Grain is adjacent to Kelly Point Park, approximately .1 to .2 miles from the Columbia River. The contaminated sediments identified in certain sections of the Willamette River are not associated with Columbia Grain. Adding the non-affected stretch of the Willamette to the proposed channel construction project would be a

sensible approach that meets community objectives while not penalizing particular operations that aren't in the area of concern.

Support for Ecosystem Restoration Proposals.

The ecosystem restoration proposals associated with this project add value to the proposed project. In addition to the mitigation requirements associated with construction, these ecosystem restoration efforts benefit the entire region and provide significant enhancement to the river system. These projects were added to the Feasibility Study as it progressed based on input from state and federal resource agencies. These additions to the proposed project are an important initiative to contribute to the restoration of the ecosystem and we urge their inclusion in the final project proposal.

Deep Water Disposal Plan

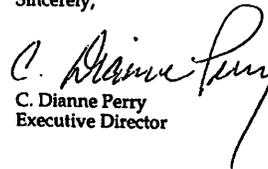
We urge additional opportunity for public involvement for the offshore disposal sites. A management plan for the sites that are finally selected, which clarifies the Corps' plans to manage the sites to minimize mounding and resource impacts and meet safety concerns, would be a useful addition to the FEIS. The Corps has expressed the intention of developing such a work plan. It is clear that public understanding and input into the Corps' plans for management of the sites that are finally selected would help meet community concerns, particularly the fishing and crabbing community.

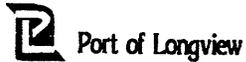
Support for Advancing the Project.

Advancing this project is one of the most important and strategic opportunities we have to enhance economic opportunities throughout the Northwest and for states shipping through this trade corridor. The proposed project builds upon our existing infrastructure investments and enhances the ability to maximize intermodal transportation efficiencies. It knits the rural and urban communities of the region and the nation together with common objectives for prosperity while assuring minimal environmental impact. While concerns have been raised about the economic downturn in the Pacific Rim, virtually every economic forecasting group believes the current economic difficulties in Asia will not be long lasting. The proposed project has been framed over a 50 year span. Short-term economic fluctuations should not influence the expected long-term trends.

For all of these reasons, we urge the Corps of Engineers to expeditiously resolve any outstanding questions raised in the initial public review of the DEIS so the project proposal can be advanced. Thank you for the opportunity to comment.

Sincerely,


C. Dianne Perry
Executive Director



February 5, 1999

U.S. Army Corps of Engineers, Portland District
 CENWP-PE-B ATTN: Steven J. Stevens
 P.O. Box 2946
 Portland, OR 97208

Dear Sir:

My name is Ken O'Hollaren and I am the Executive Director of the Port of Longview. I appreciate the opportunity to submit these comments on the U.S. Army Corps of Engineers "Draft Integrated Feasibility Report for Channel Improvements and Environmental Impact Statement for the Columbia and Lower Willamette River Navigation Channel."

As one of the seven Columbia River sponsoring ports, and as one of your partners in this project, we are proud of the cooperative efforts put forth by the ports, the state governments of Oregon and Washington, and the Corps of Engineers, which have resulted in the successful completion of this report. You, too, should be proud of the professional skills displayed by your staff in the preparation of this document. It is clear to any reader that the various technical, economic, and environmental issues associated with this project have been thoroughly, and fairly, examined by the Corps.

Recent developments and decisions at the Port of Longview underscore the importance we attach to an improved navigation channel. This month the Port will commission its new multi-commodity bulk import facility at Berth 7. This will be the only facility of its kind in the Pacific Northwest designed to unload a variety of bulk cargoes in an efficient, and environmentally safe manner. It is a \$4 million investment which reflects our optimism on the growth of these cargo volumes to the Columbia River. The ultimate success of this investment, however, depends largely on the ability of the navigation channel to serve the vessels of the future.

For 1999, the Board of Commissioners has approved a \$20 million capital budget to fund a variety of port infrastructure needs, most notably a new general purpose dock for forest products. Again, we would not be undertaking such investments if we did not see tremendous opportunities for growth in our region. An improved navigation channel has to be a part of that infrastructure as well.



U. S. Army Corps of Engineers
 February 5, 1999
 Page 2

Integral to the achievement of maximum benefit from this project is the adoption of the sponsors' alternative plan for disposal of dredged material. Perhaps no other community on the River can place a higher value on the beneficial uses of dredged material than Longview, which owes its very existence to the levee system constructed originally by river dredges. To this sponsors' plan, we are asking the Corps to include a site at river mile W-33.4, which will provide substantial economic benefit to Wahkiakum Port District No. 2 and the surrounding communities, as well as providing a long-term site to the Corps for channel maintenance.

Again, we commend the Corps of Engineers on the feasibility study, and pledge our continued cooperation toward a successful completion of the project. We encourage you to move ahead expeditiously to conclude this phase of the process so that congressional authorization can be obtained this year.

Respectfully,
 PORT OF LONGVIEW

Kenneth B. O'Hollaren
 Executive Director

cc: Board of Commissioners

GARD STRANG EDWARDS
& ALDRIDGE INC.

February 5, 1999

via facsimile and mail

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

Dear Mr. Stevens,

**Re: Lower Columbia River Channel Deepening Project —
Comments On Draft Environmental Impact Statement**

On behalf of Gard Strang Edwards & Aldridge Inc., I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

For over two decades, our communications and issues management firm has represented clients in matters of energy, natural resources, economic development, transportation and business trade. Our diverse mix of clients includes environmental groups, forest products companies, manufacturers, public and private utilities, government agencies — all the way to health care organizations, port authorities and maritime shippers. As private and corporate residents of the Pacific Northwest, these clients support and pursue the core values that reflect understanding of balanced economic and environmental stewardship. Further, our 20 years of vast public opinion and market research on behalf of these clients demonstrates that these values are upheld by the great majority of all Northwesterners. In our view, and abased upon our experience, the Columbia River Channel Deepening Project is essential to our place in a global trade economy while also responsibly addressing environmental concerns — not just for the Northwest, but for the nation.

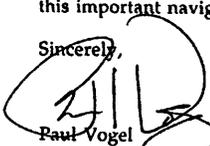
National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products

We offer these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system, will not expand the transportation capacity as needed to support shippers
2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.
3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.
4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,


Paul Vogel
Senior Vice President

K:\P\2946\del



February 5, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
PO Box 2946
Portland, OR 97208-2946

RE: Lower Columbia River Channel Deepening Project - Comments on Draft Environmental Impact Statement (DEIS)

On behalf of the Oregon International Port of Coos Bay, I am writing to express our support for deepening the lower Columbia River deep-draft channel from 40 to 43 feet. This channel improvement project is important to the region, the State of Oregon and the nation, because it serves as an important competitive corridor for ocean transportation access to key markets in Asia.

The national importance of the lower Columbia River channel is evident in a number of ways. It is the nation's largest export gateway for wheat and the second largest grain export port in the world, with agricultural commodities originating in the Pacific Northwest, as well regular shipments from many Midwest states. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps' study notes, annual transportation savings for these shippers amount to an estimated \$39 million—a measurement of enhanced competitiveness for United States export products.

I believe that deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system, were examined, but these options will not expand the Columbia River's transportation capacity. The disposal plan alternative suggested by the project sponsors offers a practical approach to this navigation improvement project. Important agricultural lands would be preserved, and dredging disposal impacts would be minimized under the sponsors' preferred plan. This project should be able to be completed in conformance with this region's environmental standards, and beneficial uses of the dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan would minimize disposal impacts.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Given the Coos Bay harbor's experience, I urge the Corps of Engineers to expedite completion of this important navigation improvement project.

Sincerely,


Allan E. Rumbaugh
General Manager

AER:dcb

cc C. Dianne Perry, Columbia River Channel Coalition

125 Central Ave., Suite 300 / P.O. Box 1215 / Coos Bay, Oregon 97420-0311 / Phone: 541-267-7678 / Fax: 541-269-1475

State of Oregon	Tokyo, Japan	Seoul, Korea	Taipei, Taiwan, R.O.C.
Representative	Phone: 81 35 275-9321	Phone: 82 2 753 1349, 1439	Phone: 886 2 723-2310, 2311
Offices:	Fax: 81 35 275-9325	Fax: 82 2 753 5154	Fax: 886 2 723-2312

PORT OF PASCO

904 E. AINSWORTH AVENUE
P.O. BOX 789
PASCO, WASHINGTON 99301-0769
(509) 547-3378 FAX (509) 547-2547

June 3, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

LOWER COLUMBIA RIVER CHANNEL DEEPENING PROJECT - COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

On behalf of the Port of Pasco, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

The Port of Pasco's container terminal is an integral component of the Columbia-Snake River transportation system, providing transportation service for industries in the region to get their product to the deep water Port of Portland facility. Approximately 75,000 tons are shipped annually from the Port of Pasco terminal to the Port of Portland for domestic and international markets.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

We offer these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.
3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.
4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,


James E. Toomey
Executive Director

PORT COMMISSIONERS:
G. E. "Ernie" BOSTON
WILLIAM G. CLARK
JAMES T. KUNDWORTH

JAMES E. TOOMEY
Executive Director

INDUSTRIAL PROPERTY TRUCKS AIRPORT MARINE TERMINALS



COLUMBIA PACIFIC BUILDING
AND
CONSTRUCTION TRADES COUNCIL



February 5, 1999

SENT VIA FAX

Steve Stevens
US Army Corps of Engineers
Portland District
PO Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING PROJECT—
COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

On behalf of the Columbia Pacific Building & Construction Trades Council, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

The Columbia Pacific Building and Construction Trades Council's interest in this project is both for the employment during the project and employment opportunities due to the deepening of the river. Economic development of this region is paramount to the needs of this Council

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for US export products.

We offer these specific views of the Draft Environmental Impact Statements (DEIS):

- 1 Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
- 2 The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agricultural lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan

Steve Stevens
US Army Corps of Engineers
February 5, 1999
Page 2

- 3 Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative disposal Plan to minimize disposal impacts are key steps to proceeding in a sensitive manner.
- 4 We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of US products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,

William W. Mehrens
Executive Secretary

WWM:mjl
opeiu #11
af-cio

Kalama Export Company LLC

2211 N. Hendrickson Drive
Kalama, WA 98625
Phone: (360) 673-3900
Fax: (360) 673-3910

February 5, 1999

U.S. Army Corps of Engineers
Portland District
CENWP-PE-E
P.O. Box 2946
Portland Oregon 97208

Att: Steven J. Stevens

Dear Mr. Stevens,

On behalf of Kalama Export Company, I am writing to express our support for deepening the lower Columbia River channel from 40 to 43 feet. This channel improvement project is of great importance to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to Asian markets.

Kalama Export Company was formed in 1998 when ConAgra (peavey) entered into a joint venture with Archer Daniel Midland Company. Over the past five years our volume has ranged between 3,788,000 and 8,780,000 metric tons. Although we load virtually every type of bulk grain, the facility handles predominantly corn. This means that the vast majority of vessels we load are Panamax size vessel's. Our normal ratio of Panamax vessel's to Handy size vessel's is 3 to 1. It is these Panamax size vessel's that will benefit from a deeper channel the most. Loss of corn export's in the region would be devastating. Based on a study done for ConAgra in 1993 the corn export's from this facility stimulates the regional economy with over \$54 million dollars of activity and over 760 jobs.

On average these vessel's sail with 5700 metric tons of slack space. When calculated on the basis of Kalama Export Co. loading 100 Panamax vessels per year. An additional 570,000 metric tons of grain could be loaded onboard ships presently calling on our facility. This additional cargo would make us more competitive for present and future business.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate primarily in the Pacific Northwest, But also include large shipments from Nebraska, North and South Dakota, Iowa, and Minnesota.

I offer these specific views of the Draft Environmental Impact Statement

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.
3. Environmental considerations are central to a project of this nature and I believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.
4. I strongly recommend moving ahead with the Columbia River segment of this project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing in the improvements work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share my views on the Columbia River Channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,



Steve Oakes
Plant Manger



February 5, 1999

District Engineer
U.S. Army Corps of Engineers, Portland District
Attn: Steven J. Stevens CENWP-EC-E
P.O. Box 2946
Portland, OR 97208-2946

Dear Sir:

The purpose of this letter is to provide comments on behalf of the governing board of Commissioners of the Port of Kalama regarding the U.S. Army Corps of Engineers *Draft Integrated Feasibility Report for Channel Improvements and Environmental Impact Statement for the Columbia and Lower Willamette Rivers Navigation Channel* (report).

The Commissioners of the Port of Kalama support the findings of the report to deepen the navigation channel to 43 feet. The Commission supports expeditiously moving ahead with work on the Columbia River Channel but prefers a more careful analysis of the problems and solutions relating to the Willamette River Channel.

The Commissioners of the Port of Kalama request that the Corps incorporate the sponsor's plan in the final EIS in order to further maximize the economic benefits of the project while reducing negative environmental impacts. The Commission also supports efforts to minimize negative economic "side effects" of the project such as possible degradation of commercial crab fisheries. As a project sponsor, the Port of Kalama is willing to help develop solutions to reduce negative impacts on the crab fisheries.

The Port of Kalama serves clients that are large players in international trade. The Port is the third largest dry bulk exporter on the West Coast and provides marine terminal services for a 400,000 ton per year steel mill with an annual payroll of over \$10 million. The steel mill imports steel commodities from all over the world, including Australia, Japan, China, Korea and South America, all by way of the navigation channel. Port clients employ over 1,000 workers, most of which are dependent on the Columbia River Channel.

Therefore, the Commissioners of the Port of Kalama urge the Corps to move forward as expeditiously as possible with the authorization for and construction of the Columbia River Channel.

Sincerely,

ON BEHALF OF THE COMMISSIONERS OF THE PORT OF KALAMA

Lanny H. Cawley
Executive Director

LHC:mw
By FAX on February 5, 1999 @ (503) 808-4805
followed by Hard Copy



February 4, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, OR 97208-2946

RE: Lower Columbia River Channel Deepening Project - Comments on the Draft Environmental Impact Statement

On behalf of Washington public ports, I am writing to express strong support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. Specifically, I would like to register our strong support for the Sponsors' Preferred Alternative Disposal Plan.

Washington's ports play a pivotal role in moving goods through the Columbia-Snake Rivers system, and if our region is to remain competitive, this corridor for ocean transportation access to key Asian markets must be accessible to today's deep draft vessels.

Washington is the most trade-dependent state in the nation with one in four jobs directly tied to international trade. It is vital for the economic health of the state to improve navigation through this channel. However, the state's transportation needs must be balanced with concerns for natural resources, and we believe the Sponsors' Preferred Alternative Disposal Plan offers the best approach. Through the preferred plan, important agricultural lands would be preserved, beneficial uses would be made of the dredged materials, and extensive habitat improvements would offset disposal impacts. We strongly recommend proceeding with the Columbia River segment of the project, and phasing the Willamette River portion.

Thank you for considering our view on the Draft Environmental Impact Statement. We appreciate the efforts of the Corps of Engineers to expedite completion of this important navigation improvement project.

Sincerely,

WASHINGTON PUBLIC PORTS ASSOCIATION

PATRICK JONES
Executive Director



P.O. Box 2306 Longview, WA 98632 • Telephone: (360) 425-8820 • Fax: (360) 425-6609

February 2, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, OR 97208-2946

**SUBJECT: LOWER COLUMBIA RIVER CHANNEL DEEPENING PROJECT -
COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Dear Steve Stevens:

On behalf of Lower Columbia Contractors Association, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

We offer these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.
3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the

Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.

4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,



Dave Roewe
Executive Director

CHARTERED BY
AFL-CIO

AFFILIATED WITH
WASHINGTON STATE
LABOR COUNCIL

**COWLITZ-WAHKIAKUM COUNTIES, WASHINGTON
LABOR COUNCIL**

P. O. BOX 430
LONGVIEW, WASHINGTON 98632



February 1, 1999

Steve Stevens
U.S. Army Corp of Engineers
Portland District
P.O. Box 2946
Portland, OR 97208-2946

RE: Lower Columbia River Channel Deepening Project-Comments on Draft
Environmental Impact Statement

On behalf of the Longview-Kelso Central Labor Council, we are writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

The workers that live and work along the Columbia River have been devastated by the decline in the timber industry and wood products. It appears that Cowlitz County is becoming a small steel producing community with its access to shipping on the Columbia River. The ports have diversified their commodities and have been able to provide jobs in the community. The next step is to deepen the channel so the ports can remain competitive as the markets in Asia.

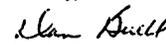
National importance of the channel is evident in a number of ways. The Columbia River Port system is the nation's largest export gateway for wheat, and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

We offer these specific views of the Draft Environmental Impact Statement (DEIS):

- 1 Deepening the channel to 43 feet is the best alternative to the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
- 2 The disposal plan alternative suggested by the project sponsor offers the best approach to the navigation improvement project. Important agricultural lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan
- 3 Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.
- 4 We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,


Dan Buell
President



**COLUMBIA
RIVER
ECONOMIC
DEVELOPMENT
COUNCIL**

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

February 4, 1999

100 E. Columbia Way
Vancouver, Washington 98661-3816
Phone 360-694-8006
Fax 360-694-9927
www.credc.org

Re: LOWER COLUMBIA RIVER CHANNEL DEEPENING PROJECT
COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

I am writing on behalf of the Columbia River Economic Development Council (EDC), to express our support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel project is important to our local economy, the region, and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

EDC members include dozens of businesses operating in the international marketplace. The net production value of these employers is expected to exceed \$7.6 billion by 2006.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Iowa, Nebraska, and Colorado. Container cargoes from more than 40 states regularly pass through our Ports. The Corps study notes an annual transportation savings for these shippers at an estimated \$39 million. This measurement represents the enhanced competitiveness for U.S. export products.

With respect to the DEIS, I would like to offer the following:

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps.
2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agricultural lands would be preserved and dredging disposal impacts would be minimized under the Sponsor's PADP.
3. Environmental considerations are central to a project of this nature and I believe this Project can be completed in conformance with our regions environmental standards.

4. I strongly recommend moving ahead with the Columbia River segment of the project as soon as possible. Prompt action here is key to enhancing the competitiveness of U.S. products.

Thank you for the opportunity to share my views on the Columbia River channel improvement project. Corps efforts to expedite this navigation improvement will be greatly appreciated

Sincerely,

Robert A. Levin
President

PC: Mark Brandon, CRBDC Chair

OWC
OREGON WHEAT COMMISSION
Celebrating years of service to the *Wheat Industry*

February 4, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING PROJECT-
COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Stevens:

On behalf of the Oregon Wheat Commission (OWC), I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

The OWC represents wheat producers in the state of Oregon. Over 90 percent of the wheat grown in the state is exported to Asia, Africa and the Middle East. The continued movement of grain through the Columbia River System is of vital importance to the economic and social health of rural Oregon.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

The OWC offers these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
2. Environmental considerations are central to a project of this nature and this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.

• Page 2

February 4, 1999

3. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.

4. The OWC strongly recommends moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River Channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,



Richard Fritz
Administrator

RF:rp



PACIFIC COAST METAL TRADES DISTRICT COUNCIL

8130 BALDWIN STREET
OAKLAND, CALIFORNIA 94621-1970
(510) 636-0500

FAX: (510) 636-0501



February 3, 1999

Mr. Steve Stevens
U. S. Army Corps of Engineers
Portland District
P. O. Box 2946
Portland, Oregon 97208-2946

Subj: Lower Columbia River Channel Deepening Project -
Comments on Draft Environmental Impact Statement

Dear Sir:

On behalf of the Pacific Coast Metal Trades District Council, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

We are engaged in ship repair; and we believe that deepening the lower Columbia River deep draft channel from 40 to 43 feet will help us in achieving more opportunities to obtain additional ship repair work.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

We offer these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.

Steve Stevens

-2-

February 3, 1999

2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.

3. Environmental considerations are central to a project of this nature, and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.

4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,

Richard E. Harden
Richard E. Harden
Executive Secretary

For and on Behalf of Ten International Unions
Involved in Ship Repair Along the Columbia
River

REH:lb
ope29afclcio

cc: Jack Sloan, Pres.
P.C.M.T.D.C.

January 21, 1999



Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING—COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT STATEMENT

On behalf of Stevedoring Services of America, I am writing to express strong support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation because the channel serves as an important competitive corridor for ocean transportation access to key markets in Asia. In addition, enhanced international trade is a positive generator for a more favorable balance of trade.

Stevedoring Services of America operates at all Lower Columbia River ports. Our Company supplies labor and equipment to load and discharge bulk, break bulk and containerized cargoes.

In the case of loading bulk grain, the current forty foot channel restricts the size of vessel that can load in the Lower Columbia; thus, increasing the freight rate per ton which is paid by the exporter. Unfortunately, many exporters have opted for Canadian and/or US Gulf Ports due to the ability to load larger vessels at cheaper freight rates.

Secondly, the worldwide fleet of container vessels has increased in size and many of vessels require more than a forty-foot channel (up to 43 feet). Many vessels that have called at Portland, Oregon have been required to call subsequently at Puget Sound Ports to complete full loading of their containerized cargo. This additional port visit is very expensive and will eventually lead to these Companies cancelling their Columbia River call. If so, then our valued local shippers will be required to pay additional drayage to Puget Sound Ports; thus, making them less competitive in the international marketplace.

National impacts for the channel are evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland.

3558 N.W. Front Ave., Suite 360
Portland, OR 97210-1302
(503) 248-0848
FAX (503) 222-3070

As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

I would like to offer these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
2. The alternatives suggested by the project sponsors also offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' alternative.
3. Environmental considerations are central to a project of this mature and I believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredge materials, extensive habitat improvements and selection of project options to minimize disposal impacts are key steps in proceeding in a sensitive manner.
4. I strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of the U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share my views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely yours,

STEVEDORING SERVICES OF AMERICA



Bruce Whisnant
Senior Vice President



Edward M. Jones and Company
7804 NE Airport Way
Portland, OR 97218
PH: 503 249 1400 FX: 503 249 3950
Email: tomj@emjco.com

January 22, 1999
Page 2

Edward M. Jones and Company

January 22, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

I am writing to express our company's support for deepening the lower Columbia River draft channel from 40 to 43 feet. We believe this project is very important to the Northwest region since the channel serves as an important service corridor for ocean transportation access to Asia and the rest of the world.

As a customs broker and freight forwarder, Edward M. Jones & Company has strong ties to Taiwan and China. We are agents for the Orient Express Corporation which one of the largest forwarders in that region. Customs brokerage or import services are very significant to our business and our clients. Since direct call shipments provide competitive service to our clients, we completely support of deepening the channel. We must assure that the Columbia River can service the ocean traffic well into the millenium.

You have certainly heard that the Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These commodities originate in the Pacific Northwest, but also include regular shipments from North Dakota, Colorado, Nebraska, Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. Annual transportation savings for these shippers are an estimated \$39 million. We think that deepening this waterway is critical to the region and a competitive advantage to the United States.

Therefore, we have drawn the following conclusions about the draft environmental impact statement:

A. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity needed to support shippers.

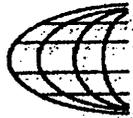
B. The alternatives suggested by the project sponsors also offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' alternative.

C. We understand that environmental considerations are central to a project of this nature and believe it can be completed in conformance with this region's environmental standards. We believe that reuse of dredge materials, habitat improvements and efforts to minimize disposal impact are key steps to success.

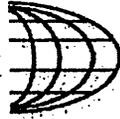
D. We completely support prompt action on the Columbia River segment of the project. Phased improvement work in the Willamette River will allow creative efforts to manage dredged materials.

Sincerely,
Thomas M. Stanton
Vice President

.....
Welcome to our sphere of influence!



DIATECT INTERNATIONAL CORPORATION



November 17, 1998

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

Dear Mr. Stevens:

As a company which relies upon export trade, it is important that we lend our support to the dredging program to deepen the shipping channels on the Columbia River.

If larger vessels can be utilized to help to minimize the freight cost component of our business, we consider the dredging program to be a very necessary action, money wisely spent.

Sincerely,

George H. Henderson
President & CEO

cc C. Dianne Perry
Executive Director
Columbia River Channel Coalition

**OREGON
WHEAT**

November 6, 1998

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

RE: Channel deepening

Dear Mr. Stevens:

The analysis process for deepening the Columbia River Channel was started nearly ten years ago. As you know, the U.S. Army Corps of Engineers has completed its draft Environmental Impact Statement (DEIS) and is sending it out for final public review.

Channel deepening is an important step the region must take to remain competitive in international trade. In the case of the wheat industry, each sacrificed foot of draft equates to 2000 tons of wheat that couldn't be loaded on a vessel common to the lower Columbia ports. Even at today's dismal wheat price of \$3.10 per bushel, three feet of additional draft — 6,000 tons of wheat — translates to \$620,000 worth of wheat that could be loaded in a deeper channel. Light-loading vessels costs money, and makes us less competitive than would be the case with a deeper channel. As freight economics drive vessel owners to larger and larger ships, this disadvantage will grow.

Since the lower Columbia handled 40% of US wheat exports (13 million tons) in 1997, freight competitiveness is an important priority. The lower Columbia serves several western states, reaching beyond the borders of the Pacific Northwest to become an important national trade gateway. The deeper channel, coupled with continued inbound barge transportation to the lower ports, will play pivotal roles in our region's international trade competitiveness and prosperity.

The lower river ports are committed to getting the project done in an environmentally sensitive manner. Trade will benefit substantially from the deeper channel, with ripple effects extending through the northwest and into the surrounding states. It's time to move forward with deepening the lower Columbia River channel; we request that the Corps move with deliberate speed toward completion.

Sincerely yours,
OREGON WHEAT GROWERS LEAGUE

Daren Coppock
Executive Vice President

cc: Dianne Perry, Columbia River Channel Deepening Coalition
Tom Decker, Port of Portland
Lynne Chamberlain Buchanan
OWGL Board of Directors

GAUSERS\CAROLYNDARENCOR\DEEPEN.WPD

221-A West 37th Street * Boise, Idaho 83717 * (208) 342-2273 * fax (208) 343-3451

Oregon Wheat Growers League • P.O. Box 400 • Pendleton, OR 97801
Phone (541) 276-7330 • Facsimile (541) 276-1723 • <http://www.owgl.org/>

CLAYTON-WARD CO. AN OREGON CORP.
3500 MAINLINE DRIVE NE
SALEM, OR 97303
PHONE (503) 393-8700
FAX (503) 393-5931

RECEIVED
OCT 28 1998
REGULATORY DEPT

DATE: 10/24/92

TO: Army Corp of ENGINEERS

FROM: We support the dredging of
the Columbia to 43' feet.

In addition you should consider
dredging the Willamette as far
as SALEM for navigation and
recreational purposes

Sincerely

WE Pentney, President

PAGES, INCLUDING THIS COVER LETTER.

IF PROBLEMS WITH TRANSMISSION, PLEASE CONTACT

(503) 393-8700.

Please include this as public
testimony

FAX TRANSMITTAL COVER LETTER

November 25, 1998



WES MENASHA CORPORATION

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

Dear Mr. Stevens:

The Portland District of the Corps of Engineers is currently soliciting public comment concerning a channel deepening project on the Columbia River. The proposed project would deepen the river to 43 feet from the mouth to Portland. Menasha Corporation would like to go on record in support of the proposed project.

Menasha is actively engaged in the log export business at the port of Longview. Availability of the most cost effective transportation from our loading port to our customers' destination in Japan is critical to the survival of our business. Ship size is a key factor in maximizing cost savings. Deepening the channel to 43 feet would allow our customers to use larger ships than are currently being used and thus load a larger cargo at Longview. At a time when log supplies from other parts of the world are severely competing with our logs, any cost advantage that can be gained for our customers is especially important. Ours' is just one of many businesses in the area that depend on the Columbia River as a cost effective transportation system. The entire region needs this project to maintain its position as a key trading partner with Asian markets.

From a preliminary review of the Corps feasibility study, it appears that the environmental impacts of the project have been considered. Assuming that all environmental issues are satisfactorily resolved, we see no reason why the project should not be undertaken.

In summary, Menasha as a company and the region as a whole, needs this project. We strongly urge the Corps to proceed as soon as possible.

Sincerely,

Richard D Hirschberg

Richard D. Hirschberg
Marketing Manager

RDH/cab

cc: Mike Aller
Bill Lansing
Rolf Glerum
Diane Perry



January 26, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING PROJECT-
COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

On behalf of the Portland Metropolitan Chamber of Commerce, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

We offer these specific views of the Draft Environmental Impact Statement (DEIS):

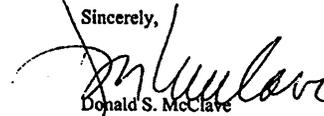
1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.
3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.

Portland Metropolitan Chamber of Commerce
221 N.W. Second Avenue
Portland, Oregon 97209-3999
503 228 9411 Fax 503 228 5126
Internet <http://www.pdxchamber.org>
e-mail chamber@pdxchamber.org

4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,



Donald S. McClave
President and
Chief Executive Officer



WORLD WIDE SUPPLIERS OF PREMIUM
QUALITY HAY, GRAIN AND LIVESTOCK FEED

January 29, 1999

Mr. Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING PROJECT--
COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Stevens,

On behalf of Anderson Hay and Grain Co., Inc., I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

We ship over 4,000 containers per year of Oregon grass seed STRAW to Asian cattle markets. We are part of an industry that ships about 14,000 containers per year of grass seed straw out of the Port of Portland via the Columbia. 10 years ago this straw was being burned, polluting the Willamette Valley. Now, our industry ships 200,000 acres worth of straw out the Columbia River to Asia instead of burning that very acreage. In addition, our industry ships many more containers of alfalfa from the Upper Columbia Basin. Our industry depends on progressive and reliable container service to compete in our overseas markets. We are a high bulk, heavy weight cargo that depends a great deal on the Columbia River channel.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million.

ANDERSON HAY & GRAIN CO., INC

23261 Hubbard Cut Off Road
Aurora, OR 97002
Phone: (503) 678-2390 FAX: (503) 678-3321

I would like to offer the following views on the DEIS:

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers such as ourselves.
2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.
3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are a few steps in proceeding in a sensitive manner.
4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products, especially agricultural products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,


Steve Van Mouwerik
General Manager, Anderson Hay Oregon Division

Cc Mark Anderson

PACIFIC RIM TRADE ASSOCIATION

526 N.W. MARLBOROUGH STREET, PORTLAND, OREGON 97210
PHONE/FAX: (503) 241-4259
EMAIL: ROLFGLERUM@MSN.COM
ROLF D. GLERUM, EXECUTIVE DIRECTOR

January 26, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING—COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT STATEMENT

I am writing on behalf of the members of Pacific Rim Trade Association to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation because the channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

PRTA is a 27-year-old organization whose membership consists of companies and individuals engaged in the export of forest products, in addition to maritime transportation issues related thereto.

The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North and South Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amounts to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

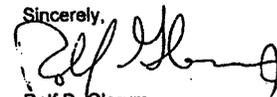
2

We offer these specific views of the Draft Environmental Impact Statement (DEIS):

- Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system, will not expand the transportation capacity as needed to support shippers.
- The alternatives suggested by the project sponsors also offer the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' alternative.
- Environmental considerations are critical to this project. PRTA believes this project can be completed in conformance with this region's environmental standards. Beneficial use of dredge materials, extensive habitat improvements and selection of project options to minimize disposal impacts are key steps in proceeding in a sensitive manner.
- We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our members' views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,



Rolf D. Glerum
Executive Director



1452 Hudson Street
 U.S. Bank Building, Suite 208
 P.O. Box 1278
 Longview, WA 98632

(360) 423-9921
 Fax (360) 423-1923
 CEDC@AOL.COM



CELEBRATING OVER A CENTURY OF SERVICE
 FOUNDED 1888

GEO. S. BUSH & Co., Inc.

P. O. Box 8829
 Portland, Oregon 97208-8829 U.S.A.



January 27, 1999

Steve Stevens
 U.S. Army Corps of Engineers
 Portland District
 P.O. Box 2946
 Portland, Oregon 97208-2946

Dear Mr. Stevens:

On behalf of the Cowlitz Economic Development Council, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

Cowlitz County has seen a significant need for the channel deepening project. Organizations such as Reynolds Metals, Longview Fibre, BHP Steel, and others rely on the Columbia River to export their product thus making it necessary for the River to support their shipments. This project is also of importance to business interested in the Cowlitz County area.

Deepening the Columbia River is not only beneficial at the local level, but at a national level as well. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

Thank you for the opportunity to share my views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,

Clint Page
 CEDC President

Steve Stevens
 U.S. Army Corps of Engineers
 Portland District
 P.O. Box 2946
 Portland, OR 97208-2946

Re: LOWER COLUMBIA RIVER CHANNEL DEEPENING PROJECT-
 COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

On behalf of George S. Bush & Co., Inc., I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia

Our collective client base represents hundreds of millions of dollars worth of imports and exports over the Columbia River.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

We offer these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
2. The disposal plan alternative suggested by the project sponsors offers the best approach to this Navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsor's Preferred Alternative Disposal Plan.
3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.
4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is the key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

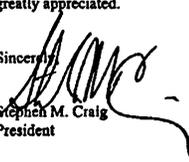
FREIGHT FORWARDERS
 OCEAN AND AIR CABLE "BUSH"
 FMC NO. 162 IATA NO. 38-5-7837

TELEPHONE 503-228-8501
 FAX 503-294-0432
 TELETYPE 910 464-1527

CUSTOMS BROKER
 CHB LIC. NO. 38

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,


Stephen M. Craig
President

SHARP

SHARP MICROELECTRONICS TECHNOLOGY, INC.
5700 NW Pacific Firm Boulevard
Carnes, Washington 98607
Telephone (360) 834-8700
Facsimile (360) 834-8611

January 27, 1999

Mr. Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, OR 97208 - 2946

RE: Lower Columbia River Channel Deepening -
Comments on Draft Environmental Impact Statement

Dear Mr. Stevens,

On behalf of SHARP Microelectronics, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation because the channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

As a subsidiary of a Japanese company, our firm chose its current site based in large part on the transportation advantages of being in the Portland area. We rely on direct transportation connections with Japan to provide us with the raw materials, parts and equipment necessary to our continued operation. In addition, our finished products are distributed to other SHARP companies around the globe. As new vessels continue to increase in size, a deeper channel becomes a necessity for the Columbia River. Failure to deepen the river will result in a reduction of steamship activity in the region. This can only have a negative impact on companies such as SHARP.

National impacts for the channel are evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.


COLUMBIA CORRIDOR
A S S O C I A T I O N

We offer these specific views on the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
2. The alternatives suggested by the project sponsors also offer the best approach to this navigation improvement project. Important agricultural lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' alternative.
3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredge materials, extensive habitat improvements, and selection of project options to minimize disposal impacts are key steps in proceeding in a sensitive manner.
4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamete River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,



Richard J. Housman
Import-Export Administrator

Sustaining Sponsors
January 27, 1999

Bit-Tel Investment
Boeing Portland
FacitCorp
Portland Development Comm.
Portland General Electric
Port of Portland
Sivers Companies
Three Oaks Development

Board of Directors
President, Tim Ramis
O'Donnell Ramis Crvo

Vice President, Chuck Harrison
Hallon Company

Secretary, Mary Gibson
Port of Portland

Treasurer, Doug White
Centennial Bank

Mary Abrams
City of Portland - BES

Bob Alexander
Portland Development
Commission

Sue Bullington
Nordstrom

Steve Daneman
Daneman Realty

Michael Dillon
Mt. Hood Community College

Bernard Galitzki
Bit-Tel Investment

Sheila Holden
Pacific Power

Sandra Japlay
NW Natural

L. Guy Marshall
Columbia Steel Casting Co.

Don Ossey
Ossey Patterson Co.

Tony Reser
Cushman & Wakefield

Paul Shirey
Port of Portland

Eric Spavro
Spitker Properties

Claudia Steinberg
TRI-AIET

Anne Nickel
Executive Director

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING - COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT STATEMENT

On behalf of the Columbia Corridor Association (CCA), I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation because the channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

The Columbia Corridor, home to over 2900 businesses and 40 % of the regions vacant industrial land, is the transportation hub for the State of Oregon and this region of the country. The Corridor has Portland International Airport, 4 marine terminals, two transcontinental railroads, 3 highways (I-5, I-205, I-84), and is the terminus for the 2nd largest river barge system (Columbia / Snake Rivers) in the country. Shipping is a critical intermodal connection in this transportation hub. With an estimated 14 % (and growing) of the gross state product in import/export activities, shipping continues to play vital role in the success of our economy. "All roads lead to the Columbia Corridor" because we are the gateway to the world and nation.

National impacts for the channel are evident in a number of ways. The Columbia River port system in the nation's largest grain export in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

We offer these specific views of the Draft Environmental Impact Statement (DEIS)

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.



BHP Coated Steel Corporation
BHP Steel Products

Page two
CCA

2. The alternatives suggested by the project sponsors also offer the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the sponsors' alternative.
3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredge materials, extensive habitat improvements and selection of project options to minimize disposal impacts are key steps in proceeding in a sensitive manner.
4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of the U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,

Anne Nickel
Executive Director

cc: CCA Board of Directors

January 27, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P O Box 2946
Portland, OR 97208-2946

Re: Lower Columbia River Channel Deepening Project—
Comments on Draft Environmental Impact Statement

Dear Mr. Stevens:

On behalf of BHP Coated Steel Corporation I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important corridor for ocean transportation access to key markets in Asia.

Our business success depends upon being able to import semi-finished steel by ocean-going vessel. We currently consume approximately 250,000 tons of steel per year and expect that to increase to 360,000 tons per year within two years.

Because steel is so dense, vessels supplying our company are often weight rather than volume limited. It is our expectation that in future years our suppliers will need to take advantage of the economies offered by greater keel depth.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

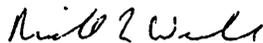
We offer these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.

2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.
3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsor's Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.
4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of the U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Very truly yours,
BHP Coated Steel Corporation



RICHARD L. WECHSLER
President

RLW:clm

COLUMBIA GRAIN, INC.
15660 N. Lombard
Portland, Oregon 97203



Terminal #5
Portland, Oregon
Area Code 503-286-9681

January 26, 1999

Mr. Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING—COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT STATEMENT

On behalf of Columbia Grain, Inc., I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation because the channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

Columbia Grain, Inc. is a regional grain company located in Portland, Oregon. CGI operates approximately 30 facilities located in the states of Oregon, Washington, Idaho and Montana. Our export facility is located in the City of Portland on the Willamette River in the Rivergate Industrial Park area. We export approximately 3 million metric tons of wheat, barley and canola annually. CGI handles 10-12% of all U.S. wheat exports. Additionally we ship commodities such as dry green peas, lentils and Austrian winter peas for export by containers from the Columbia River system.

As I said CGI is located on the Willamette River very close to the mouth of Willamette River. We are adjacent to Kelly Point Park approximately .1 to .2 miles from the Columbia River. I am concerned about the discussion to delay proceeding with lowering the Willamette River to 43 feet. While I am concerned about the toxic materials in certain sections of the Willamette, the Columbia facility is not located in those areas. I can see no reason why dredging could not proceed in the lower sections of the Willamette. For Columbia Grain to not have access to a 43 foot channel would present us with a serious competitive problem with other grain operators located on the Columbia River.

In the longer term, Columbia Grain would desire to reenter the corn and soybean export business. We must have competitive freight rates to maintain and expand our existing business. Competitive rates are achieved through the

maximum use of panamax and larger size vessels. The deepening of the channel to 43 feet is vital in maximizing the use of these vessels. Corn and soybean exports move almost exclusively in the larger size vessels. The use of these vessels is becoming much more prevalent in the wheat trade also.

The health of our regional economy is linked to a competitive river transportation system. The U.S. faces intense competition from other grain exporting countries. Transportation has long been a key advantage for the U.S.

National impacts for the channel are evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

I would like to offer these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
2. The alternatives suggested by the project sponsors also offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' alternative.
3. Environmental considerations are central to a project of this mature and I believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredge materials, extensive habitat improvements and selection of project options to minimize disposal impacts are key steps in proceeding in a sensitive manner.
4. I strongly recommend moving ahead with the Columbia River and lower Willamette segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of the U.S. products. Phasing the improvement work in the affected sections of the Willamette River would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share my views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,

Bert Farrish
President, Columbia Grain, Inc.



January 29, 1999

Air Express Int. (AEI)

Allports Forwarding, Inc.

Byrnes

Circle International, Inc.

Edward M. Jones & Co., Inc.

Expeditors International

Fritz Companies, Inc.

Fujitran U.S.A. Inc.

Gallagher Transport International

Geo. S. Bush & Co., Inc.

Global Trading Resources, Inc.

James J. Boyle & Co.

Kinetsu World Express (USA) Inc.

Kyocera Industrial Ceramics

Lindsay Forwarders, Inc.

Nippon Express USA, Inc.

Oregon International Airfreight Co.

Ronald D. Scribner Co.

Summit Trade Specialists (U.S.)

The Myers Group

TLR - Total Logistics Resource

Western Overseas Corp.

William Springfield

Yusen Air & Sea Service, Inc.

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, OR 97208-2946

Re: *Lower Columbia River Channel Deepening - Comments on Draft Environmental Impact Statement*

On behalf of the Columbia River Customs Brokers & Forwarders Association, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation because the channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

National impacts for the channel are evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated \$39 million, a measurement of enhanced competitiveness for U.S. export products.

The CRCBFA offers these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
2. The alternatives suggested by the project sponsors also offer the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' alternatives.

3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredge materials, extensive habitat improvements and selection of project options to minimize disposal impacts are key steps in proceeding in a sensitive manner.
4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U. S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,


Judith L. Haggin
President