C·R·C·F·A
COLUMBIA RIVER
CRAB FISHERMAN'S ASSOC.
PO Box 461
Ilwaco, WA 98624

CRCFA
Commissioners:

Dale Beasley
PO Box 461
Ilwaco, WA 98624
(360) 642-3942
crabby@willapabay.org

Mike Barrett
PO Box
Ilwaco, WA 98624
(360) 642-5138
sharibar@willapabay..org

Chris Doumit
PO Box 342
Cathlamet, WA 98612
(360) 795-0601
bristolpac@aol.com

Dwight Eager
PO Box 141
Chinook, WA 98614
(360) 777-8727
deager@pacifier.com

Rob Greenfield
PO Box 84
Chinook, WA 98614
(360) 777-8242
green@transport.com

Bill Rhodes
PO Box 2215
Gearhart, OR 97138
(503) 717-1068
crabber@pacifier.com

Kerry Suomela
PO Box
Ilwaco, WA 98624
(360) 642-3589
socross@willapabay.org

US Army Corps of Engineers
Portland District
PO Box 2946
Portland Oregon 97208 – 2946

3 March 2003

RE: Columbia River Channel Improvement Project, Final Supplemental Integrated Feasibility Report and Environmental Impact Statement

CENWP-EM-E

Lead agency: US Army Corps of Engineers
SEPA: Port of Longview
Cooperating Agency: US Environmental Protection Agency

Attn: Robert Willis and all concerned parties

The Basic Response to the multitude of documents associated with the Columbia River Channel and Ocean Disposal has received sufficient comments from CRCFA that you completely understand our positions related to the Final SEIS before you read this short letter. Please refer to and review all our prior correspondence and references related to this issue, which you already have.

The MCR needs its own EIS, which can be based in part on the current documents.

CRCFA would initially reiterate our substantial concern of stewardship for marine fish and shellfish in and around all dredging activity. The food web, shelter requirements, in the marine environment have, not been adequately addressed. Prevention is superior to ineffective and most often only promised re-habilitation.

CRCFA requested many unsubstantiated statements in the FEIS be removed, they are still slanting the scant information available. See CRCFA DEIS & FEIS comments.

Sustainable solutions are in development and need to be addressed as primary disposal options not adequately addressed in any EIS document.

Coastal erosion effects and an environmentally sound sand capture mechanism such as Benson Beach is not yet fully developed. The issue of direction and quantity of sand transport away from site E is still not established as guaranteed in the 103 expansion of the site over six years ago.

The issue of acceleration of natural attenuation in the mouth of the artificial submarine canyon in the area of site F is not understood. Mounding to close to this new phenomenon may be detrimental to navigation. The location of the 103 deepwater site may be critical. Information related to this issue is being withheld.

Small vessel navigational safety is inadequately addressed. The issue of mound induced wave amplification is not in final form to satisfactorily protect human health and safety.

Inventory and baseline information related to Dungeness crab is inadequate to make informed decisions at both the shallow and deepwater sites. No inventory or baseline information is advanced for RM –5 area. Effects beyond the sites which are occurring, especially outside of site E have not been investigated. Sterilization of commercial production of Dungeness crab at disposal sites is still being ignored and opportunity to verify at site B has lost six years of invaluable information that cannot be recovered. Failure to investigate is not acceptable.

The Deepwater site is over-sized for the demonstrated need.

All dredge operations need compensatory mitigation for damages to Dungeness crab to replace avoidable and unavoidable damages to habitat, resources, and use. P6-93 claims the project will "provide appropriate mitigation for unavoidable losses." No mitigation plan is in place for crab.

Biologic timing windows that prevent unnecessary damage to the crab resource are not adequately in place.

The issues of overall fairness and social equity have not been adequately addressed to protect the coastal communities economic natural resource base including Dungeness crab.

To continually advance to the public at large the erroneous fact that NO sediment is being placed in the ocean is nothing more than a bold faced LIE, as 4 – 5 mcy each and every year is going to ocean disposal and the use of RM – 5 and below as a primary disposal site is just plain deceitful. Call RM – 5 what it is, ocean disposal.

Tell the public what is really going on by attempting to divide and separate the deepening and ocean disposal. It is just an end run to get the money and void the protections advanced by past Washington State Legislative actions that call for protection of the crab industry. Tell the public ocean disposal is still on the table from the deepening if the SEIS process is not successful in placing the dirt in the gill-netters backyard instead of the crabbers.

The SEI workshops were extremely narrow in focus on ESA salmon only and cannot be used for any other purpose.

Call a pile dike what it is, and has been for over 100 years, certainly not restoration. Be honest.

Salinity increases of 5 ppt will dramatically influence crab utilization within the estuary and increase damages to crab.

EFH is inadequately addressed in the Document.

Please review CRCFA comments to the 2003 MCR public process.

Mr. Willis, these are some of the outstanding issue you assured the public, in 2000 that would be addressed at the ocean disposal taskforce meetings before final decisions were made related to ocean disposal, refer to your Holmes Restaurant letter. CRCFA is still waiting for your assurances to become reality. This current FSEIS is an unsatisfactory response to the above concerns that still need resolution. The current EA on the MCR is nothing more than a FONSI. Necessary fact finding is still in desperate need to substantiate excessive assumptions.

CRCFA is here in formally requesting and EIS related directly to the MCR and lower river estuary to address the responsible public concerns that we, and many others have advanced over the last three years. CRCFA has a stack of requests from concerned individuals over $\frac{3}{4}$ of an inch thick for such an action, of which both you and EPA have copies.

The dredging documentation at the Columbia and Nearshore Ocean has to address economic impacts both up and down river, environmental impacts, marine safety, and social equity as a unit in locating the best alternative disposal at the MCR. The MCR authorization may need to be redefined and the lower estuary deep draft channel relocated, significant actions requiring an EIS.

The current review process is shortchanged in time since other public reviews have unduly competed for scant available time. An extension of time for this FSEIS is in order as well.

Thoughtfully submitted,

Dale Beasley, CRCFA