Coos Bay Chapter

October 3, 2017

To: Dr Ann Hodgson
U.S. Army Corps of Engineers,
Portland District (PM-E),
P.O. Box 2946, Portland, OR 97208-2946

Subject: Coos Bay Chapter Surfrider Foundation questions regarding Document Citation 82 FR 39517; Intent to Prepare a Draft Environmental Impact Statement of the Coos Bay Channel Modification Project

The Coos Bay Chapter of the Surfrider Foundation works within the greater Coos County area focusing on a variety of programs, stewardship activities, campaigns and fun events – all for the love of local ocean, waves and beaches. The chapter serves Coos County with the longest running beach water quality monitoring program (Blue Water Task Force) in the state of Oregon.

Our chapter is dedicated to protecting our local beaches, waters and engaging the next generation of coastal defenders. As such, we feel the DEIS must address the following questions and issues:

a. **Please address how this project will "*have a net beneficial effect on the estuarine ecosystem in the vicinity of Coos Bay*".** The stated goal of this project is to "*improve navigation efficiency, reduce shipping transportation costs and facilitate the shipping industry's transition to larger, more efficient vessels".* The January 11, 2008 DEIS (73 FR 2013) Purpose and Need, had four need statements dealing with economics and security. Seemingly as an afterthought, Need statement (5) stated *"to have a net beneficial effect on the estuarine ecosystem in the vicinity of Coos Bay"*. A healthy and functioning estuarine ecosystem contributes to the livability of Coos County and is certainly vital to the economy of the area. Any adverse impacts to this ecosystem and the connected livability of our area must be day lighted in the FEIS. These impacts must include the long term issues of increased shipping, associated hazardous materials spills acoustic harassment to aquatic species, impacts to view sheds, affects to fishing and crabbing activities all of which of potential for diminishing the livability of this area.

b. **How will this project affect juvenile rearing habitat for Dungeness crab, salmon, various shell fish that inhabitant our Bay.** Suction dredging does capture aquatic species that cannot avoid the drag-head. How many juvenile crab, salmon, and or shellfish species will be lost to the recruitment ranks of these economically vital fisheries due to this project and it's subsequent maintenance operations. What will the impacts be to important juvenile rearing areas such as eel grass beds and in stream woody material habitats?

c. **How will this project affect current harbor and adjacent infrastructure?** Many of the docks, piers, dolphins, and even much of downtown Coos Bay are build on pilings that are, in some cases, over one hundred years old. Will this project change the current hydrodynamics to the point where these aging structures are compromised? If so, what is the estimated cost to mitigate the affects to infrastructure and public safety?

d. **How will removing bedrock within the channel work area affect the adjacent sand/silt substrate.** Deepening of the existing federal navigation channel will be required to accommodate the vessels with capacities proposed to be received at the terminals. The significant volumes of material to be removed, the geomorphic adjustments to the bay and its tributaries precipitated by deepening the channel, and all potential impacts to water quality and beneficial uses must be included in the analysis of dredging for this proposal, particularly with regard to projected ongoing maintenance dredging.

e. **What will the frequency and magnitude of maintenance dredging be?** Will the existing off shore disposal sites be adequate. Will "one time use disposal site L" become a many time site? With removal of bedrock hydrological control points, will adjacent sand/silt material be more likely to mobilize, and fill in the dredged channel and hence require more annual maintenance dredging? Please address this in the analysis.

f. **Will "beach nourishment" be considered in any Alternative?** Old dredge disposal sites are located throughout the North Spit including the area along the Log Spiral Bay/Trestle Relic. Will "beach nourishment" or any terrestrial disposal take place on or adjacent to the North Spit? If so, please provide an analysis of impacts to Snowy Plover's and their habitat as well as to recreational calming areas, surfing opportunities and other recreational activities on the North Spit.

g. **Please address how recreation sites on the North Spit and Bastendorff Beach will be impacted by this project, in particular how the offshore disposal sites may impact beach geomorphology.** Bastendorff Beach and the North Spit are popular recreation sites. Beach combing, surfing, clamming and surf fishing are but a few of the many delights these sites offer to the public. How will off shore disposal of spoils affect beach ecology and the associated recreational experience at these two very popular recreation sites.

h. **Rising sea levels and localized flooding.** Residents of Coos County are now living the results of climate change and raising sea levels. We are concerned that localized flooding may be exacerbated due to this project. Please address this in the analysis.

i. **How will this project affect the Port of Charleston?** The Port of Charleston provides important services to the recreational and commercial fishing industry. Please include an analysis of Port of Charleston's contribution to the local economy and the potential affects to the vibrancy of this important element to the Coos County economy.

The Coos Bay Chapter of the Surfrider Foundation looks forward to reviewing and commenting on the Draft Environment Impact Statement. Please keep me informed as to the progress of the DEIS.

Sincerely,

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