

26 July 2003

Hiram Arden
Project Manager
Navigation Section
PO Box 3755
Seattle, Washington 98124

RE: Public Notice Reference # CENWS-OD-TS-NS-21, A.U.S. Army Corps of Engineers, Placement of Transition Gravel and Cobble, Westport, Washington@

Mr. Arden:

The Surfrider Foundation is a grass-roots environmental organization dedicated to the preservation of the world's waves, oceans and coastline through conservation, activism, research and education. These comments are submitted on behalf of the Surfrider Foundation. We request that these comments be considered before the transitional gravel project proceeds in Westport, Washington.

We thank your office for a well presented environmental assessment and for extending the comment period one month beyond the originally proposed date in July. We present the following comments in the hopes that a long-term solution can be found that protects the interests of the many recreational users that surf, beach-walk, paddle, surf and fish at Half Moon Bay, as well as the city of Westport, Westhaven State Park and the beach itself and its many native inhabitants.

We are very concerned by the proposed "interim" placement of 27,000 cubic yards of 12" and less gravel to 1,000 linear feet of beach on the west end of Half Moon bay. The project is of concern both in and of itself and also as it relates to the series of projects that have taken place around the South Jetty since the original breach fill was installed in the fall of 1994. We understand the need to protect the South Jetty and Westhaven State Park from further erosion, but implore the Army Corps of Engineers to alter the proposed project to protect ecological function and recreational and esthetic characteristics in Half Moon Bay. Additionally we encourage the Army Corps to immediately propose long-term solutions that will not compromise the ecological and increasingly important recreational benefits of a sand beach in Half Moon Bay.

Our points of concern are as follows:

1. The larger size gravel (6"-12") that makes up 15% by weight of the proposed fill material will create unacceptable impacts to the aesthetic and recreational characteristics of Half Moon Bay. I walked today along the "beach" of fist- to head- sized cobble along the west side of the bay, material placed there between 1999 and 2002. The scarp is at least 8-feet high and steep enough that it is

impassable. The walking was difficult and the beach was esthetically unappealing. The proposed project will add another 1000 feet of similar cobble to the beach. Additionally, I saw no sand during my walk along the treated section of Half Moon Bay. Sand plays an important role in the coastal ecosystem, supporting its own biotic community as well as providing nesting spaces, notably for forage fish. It is our hope that if this project proceeds, the use of a smaller size cobble (6" or less) will preserve pockets of sand that will provide critical habitat to forage fish.

2. Section 5.3 of the Environmental Assessment, "Fish and Wildlife Impacts", is inadequate and a better understanding of the impacts to forage fish (through loss of habitat) and the benthic near-shore community should be developed before work is to proceed. The EA states, "Nothing is known about benthic invertebrates in the project footprint, so it is difficult to predict impacts." We encourage the Army Corps to examine the project footprint and, using widely available science, establish a prediction of impacts due to the installation of the material as well as long-term habitat impacts due to changes in the substrate composition
3. The EA refers to the original breach fill after the 1993 breach of the South Jetty as an, "interim measure". In January 2002, another interim and emergency treatment of cobble in Half Moon Bay, to protect the haul road to the jetty, was installed. This project represents another installment in what is becoming a long line of interim fixes that are now extending eastward along Half Moon Bay's shoreline. A continued series of rock or cobble fixes marching eastward down the shoreline of Half Moon Bay is not acceptable because of its ecological and recreational impacts. The Surfrider Foundation requests that the Army Corps of Engineers submit for public review a long-term solution that preserves the ecological and recreational characteristics of Half Moon Bay
4. Consultation with coastal engineers familiar with this project and other similar projects has led to the conclusion that the wave diffraction mound constructed as a long-term solution in 1999 has actually decreased the stability of the beach in the proposed project area. This is contrary to the stated goal for building the wave diffraction mound ("construction of a wave diffraction mound to maximize wave refraction-diffraction, thereby reducing wave-induced erosion of the shore in the western portion of Half Moon Bay adjacent to the jetty", Section 1.1 of the Draft Environmental Assessment). We encourage the Army Corps of Engineers to re-evaluate the wave diffraction mound, subject the concept to a thorough sediment modeling analysis, and use that knowledge to develop a long-term solution that preserves the ecological and recreational characteristics of Half Moon Bay.
5. Using the current beach at the west end of Half Moon Bay as an example, the placement of the proposed material constitutes a hardening. We dispute the assertion that, "At the location of proposed transition beach termination...the longshore transport potential is reduced and much less end-cutting is expected." (Section 2.2 Draft Environmental Assessment). Again, based on consultation

with coastal engineers we conclude that the placement of an additional 1000 feet of material will transfer the scouring effect of the waves down beach, necessitating another “interim” treatment progressively eastward in a few years. As stated earlier, this is unacceptable as it will significantly compromise the ecological function and recreational characteristics of Half Moon Bay.

Please accept and consider these comments. Elaborated here are concerns with the specifics of this project as well as the likely long-term effects of this “interim” treatment. Again, we implore the Army Corps to immediately propose a long-term solution that protects the ecological function and recreational and esthetic characteristics of Half Moon Bay.

Sincerely,

Ian Miller
Washington Field Coordinator
Surfrider Foundation