



United States Department of the Interior

FISH AND WILDLIFE SERVICE

510 Desmond Drive SE, Suite 102
Lacey, Washington 98503
Phone: (360) 753-9440 Fax: (360) 753-9008

Colonel Debra
M. Lewis
District

Engineer (Hart, Kinney, Arden)
Seattle District, Corps of Engineers
P.O. Box 3755
Seattle, Washington 98124-3755

Dear Colonel Lewis:

Subject: Public Notice CENWS-OD-TS-NS-21; Placement of Transition Gravel and Cobble, Westport, Washington

Thank you for the opportunity to comment on the Corps of Engineers' (Corps) proposed action to place 27,000 cubic yards of gravel and cobble along 1,000 lineal feet of shoreline of Half Moon Bay, adjacent to the Grays Harbor South Jetty in Grays Harbor County, Washington. The proposed action is described as an interim measure to stabilize the Half Moon Bay shoreline and reduce the risk of another breach from occurring until a long-term solution can be developed and implemented.

The following comments and recommendations are being provided pursuant to the Fish and Wildlife Coordination Act. Our response to the Corps' request for Endangered Species Act consultation on this project will be provided in a separate letter.

The U.S. Fish and Wildlife Service has concerns that the current action may result in substantial changes to the character of the shoreline, especially if accelerated erosion to adjacent areas is caused by this action and these other areas in turn require protection. We are particularly concerned about the potential that this project could result in the cumulative hardening of the shoreline and the subsequent change in the fish and wildlife usage of the Half Moon Bay shoreline. Although the use of gravel and cobble would likely result in fewer impacts to the biological community than the use of riprap, the change in beach substrate size from sand to gravel and cobbles will still make the shoreline less useable for species such as shorebirds, surf smelt, sand lance and juvenile salmon. We recommend that the Corps use sand, instead of gravel and cobble, to augment the Half Moon Bay shoreline so that the existing character of the beach is maintained until a long term solution can be developed and implemented.

We request that the Corps' development of the long term solution to erosion problem at Half Moon Bay involve the participation of the federal and state resource agencies and other stake holders in the early development phase of the planning process. We believe the limited or lack of success of the various shoreline protection measures that have been implemented since 1993, indicates the interaction of waves, currents, and sediment with the shoreline and existing structures is highly complex, and warrants the full consideration and evaluation of a wide range of alternatives. A review of the existing data and thorough evaluation of the relevant physical,

bathymetric, and hydraulic factors for each option should be conducted before selecting a preferred alternative. The resource agencies and other stake holders need to be able to participate throughout the development of possible options, not just at the end of the process when a decision on the preferred alternative has already been made.

We look forward to working with the Corps on developing a long term solution that both addresses the shoreline erosion problem at Half Moon Bay and adequately protects the fish and wildlife resources of the area. Please contact Mr. Gwill Ging at (360) 753-6041, if you have questions.

Sincerely,

Original signed by Nancy Brennan Dubbs 8/29/03

Ken S. Berg, Manager
Western Washington Fish and Wildlife Office

cc:

EPA (J. Barton)

NOAA Fisheries (J. Stadler)

WDFW (B. Burkle)

WDOE (H. Pressley)