

RECEIVED

JUL 01 2008

via fax

Columbia River Crossing



Oregon Department of Fish and Wildlife

North Willamette Watershed District

17330 SE Evelyn St.

Clatskanie, OR 97015

Phone: (971) 673-6000

Fax: (971) 673-6074

To: MARGI LIFSEY

From: JIM BRICK

Fax:

Pages: 3 (including cover) ✓

Phone:

Date: 7/1/08

Re:

CC:

- Urgent
- For Review
- Please Comment
- Please Reply
- Please Recycle

• Comments:



Oregon

John A. Kitzhaber, M.D., Governor

Department of Fish and Wildlife

Northwest Region
17330 SE Evelyn Street
Clackamas, OR 97015-9514
(503) 657-2000
FAX (503) 657-2050*

6/30/08

Margi Lifsey
Environmental Coordinator
Columbia River Crossing



Re: Columbia River Crossing Comments on 2008 DEIS

The Oregon Department of Fish and Wildlife (department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Interstate 5, Columbia River Crossing Project. The department offers the following comments:

Five alternatives are proposed in the DEIS. These alternatives range from a no build option to a supplemental crossing and a replacement bridge option. Each of the build options includes an alternative with light rail or rapid bus transit.

Currently no preferred alternative is identified, as a result the DEIS lacks specifics needed to assess impacts to fish and wildlife populations. The department offers a few general comments for this DEIS and will continue to work through the InterCEP committee to identify avoidance, minimization and mitigation measures as the project continues to develop and the local preferred alternative (LPA) is chosen.

Potential impacts and concerns include:

- Inwater work periods-This is a topic of extremely high importance to the department. Depending on timing of in-water work, impacts to a number of important, as well as ESA listed fish species, could be realized.
- Hydroacoustic effects-The effects of pile driving on fish have been studied and monitored. Vigilance in maintaining all mitigation measures need to be assured with knowledgeable staff on hand and back-up measures ready to be employed for emergency situations. Depending on the time of year pile driving is occurring a failure of the mitigative measures could result in a fish kill.
- Instream and riparian habitat-Piers, piles and pile caps placed within the floodplain of the Columbia River will occupy a certain amount of area. This area corresponds to a loss of fish habitat and will be realized for the life of the bridge. Riparian habitat will also be affected.
- Wildlife habitat and displacement of nesting raptors-The project will most likely have two layers of impacts on nesting raptors. The first will be relatively short term during construction and the second may be long-term depending on the LPA chosen.
- Fluvial impacts-Fill within the floodplain will impact fluvial processes and thus habitat forming processes for the life of the bridge.
- Water quality-Creation of new impervious surfaces and direct run-off to the river would allow a number of chemicals to enter the river and effect fish migration and health, impacts would vary with the LPA chosen.
- Predator fish-The Columbia River has a number of predatory fish that consume salmonid species rearing or migrating through the area. The addition of pile caps may create areas of hiding for ambush predators.

- Recreational fisheries-Depending on the time of year, construction sequencing and potential local area closures, could have a direct impact on the angling public.
- A Fish Passage Plan will need to be submitted for approval to ODFW. Per Oregon Revised Statute 635-412, any artificial obstruction located in waters of the state in which native migratory fish are currently or were historically present must address fish passage requirements. The Columbia River is home to many species of native migratory fish including multiple species of salmon and steelhead listed under the State and Federal ESA.

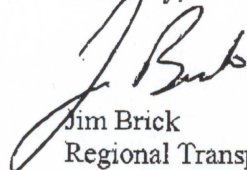
Based upon the assessment within the DEIS, the replacement crossing with the stacked bridge/highway transit option, is an improvement over the existing situation in the long term. This alternative will have less area and volume of fill below the ordinary high water line (10-20%). The result of less fill should improve fluvial processes and may provide less hiding space for predatory fish.

This alternative (amongst the build alternatives) can be completed in the shortest amount of time. This corresponds with less inwater work and less impacts to the angling public. This alternative allows treatment of stormwater which ultimately improves existing conditions.

Although discussions will continue through the InterCep Committee to avoid, minimize and mitigate unavoidable impacts, the department supports the replacement alternative with a stacked transit/highway bridge option.

Please feel free to call if you have any further questions.

Sincerely,



Jim Brick
Regional Transportation Coordinator
North Willamette Watershed District Office
Oregon Department of Fish and Wildlife