The American Waterways Operators

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Director Casey Sixkiller
Washington Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504

RE: Draft Supplemental Environmental Impact Statement for the Deschutes Estuary Restoration Project

Dear Director Sixkiller:

The American Waterways Operators is the tugboat, towboat and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. As the largest segment of the nation's 45,000-vessel domestic maritime fleet, our industry plays a vital part in America's supply chain and national security, moving the nation's commerce on U.S. inland and intracoastal waterways, the Atlantic, Pacific and Gulf Coasts, and the Great Lakes. On behalf of AWO's more than 300 member companies, we appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for the Deschutes Estuary Restoration Project.

AWO supports the project's goals of restoring estuaries and salt marsh habitat, improving water quality, and strengthening the ecological health of the Deschutes River watershed and Budd Inlet. However, these important objectives must be pursued in a manner that also protects commercial navigation and preserves reliable access for commercial vessels calling at the Port of Olympia.

The SEIS and previous environmental reviews acknowledge that removal of the Fifth Avenue Dam would substantially increase sediment deposition in West Bay. The 2022 Final EIS concludes that the resulting impacts to navigation would be significant "but could be reduced to less than significant if consistent funding is available for the maintenance dredging program, and with the implementation of the recommended sediment monitoring." The Draft SEIS relies on the subsequent interlocal agreement to formalize those maintenance-dredging and sediment-monitoring responsibilities.

AWO appreciates that the interlocal agreement establishes shared responsibilities and funding arrangements for sediment management. However, the less-than-significant impact on navigation finding depends on consistent funding and implementation of sediment monitoring and maintenance dredging.

Additionally, the contaminated-sediment issue is particularly important because the interlocal agreement treats the Port-led cleanup as separate from the restoration project and its sediment-management program. The agreement anticipates that the Fifth Avenue Dam will not be removed until remediation in West Bay is complete, but the cleanup itself is not required or funded by that agreement. The agreement also recognizes that proceeding before remediation is completed could significantly increase maintenance-dredging costs and complicate future sediment management. AWO is concerned that these complications could, in turn, further impact navigation.

Before the project proceeds, there needs to be a clear and reliable basis for concluding that existing contaminated sediment in navigational areas of West Bay will be remediated and that commercial vessel access will not be materially restricted during project implementation or long-term operation.

AWO therefore requests that the Final SEIS make clear that dam removal and other actions that would increase sediment deposition in West Bay will not proceed until the agencies can demonstrate that impacts to commercial navigation will be less than significant without relying on unresolved or anticipated future actions.

AWO supports the project's habitat-restoration and water-quality goals. However, those benefits cannot come at the expense of the working waterfront or safe and reliable commercial navigation. A clear and dependable resolution of the project's navigation impacts is necessary before AWO can support the project moving forward.

Thank you for the opportunity to comment on the draft SEIS. AWO would be happy to provide additional information or answer any questions.

Sincerely,



Peter Schrappen
Pacific Region Vice President & Regional Team Lead