

prevent the erosion of additional significant cultural resources which might lie in the portions of the bluff that have not yet been subject to erosional forces.

5. The initial plan, reported to the Court in the first Quarterly Status Report contemplated earth fill with primary reliance on vegetation to control erosion. Pursuant to subsequent study, the Corps has concluded that due to the time it would take for vegetation to become well established, the force developed by flows of the nature of the 1996 and 1997 spring runoffs, and the effects of wave action, armoring with rock is necessary for the site protection effort to have a high probability of success. Consequently, changes to the plan were made which were incorporated into the current plan and mailed to plaintiffs on December 23, 1997.

6. The Corps believes that site protection work is still important due to the unpredictable nature of the Columbia Basin runoff over the past years. For example, looking at 1996 and 1997 as models, there was near record flooding causing severe erosion damage along much of the Columbia.

7. As I understand the plaintiff's position, they do not dispute the fact that erosion is a problem in beach area where of the remains were found. Plaintiffs' however, primarily object to the manner which the Corps proposes to protect the site as