US Army Corps of Engineers®
Portland District

WILLAMETTE VALLEY SYSTEM OPERATIONS AND MAINTENANCE

ENVIRONMENTAL IMPACT STATEMENT

APPENDIX P: PUBLIC SCOPING REPORT

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1 Introduction

This report documents the U.S. Army Corps of Engineers' (USACE) public scoping process for the Willamette Valley System (WVS) Operations and Maintenance Final Environmental Impact Statement (FEIS) and Supplemental EIS (SEIS). USACE developed the FEIS and SEIS in accordance with the National Environmental Policy Act (NEPA), which requires all federal agencies to analyze potential environmental, social, and economic impacts of their proposed actions as well as to identify and consider reasonable alternatives to those actions. Public scoping is required under NEPA and is one of the earliest phases in the development of an EIS.

This report details the public engagement tools and methods USACE used during the public scoping period for the FEIS and SEIS, and the data and analysis of the public comments. The intent of this report is to provide the public with information about the scoping process and issues that were raised by stakeholders during the public scoping period. USACE will also use the public comment summary in this report to inform the NEPA process to help refine the alternatives considered and focus the issues for analysis.

Sections 1-3 of this report pertain to the public scoping process for the FEIS, which was complete in April of 2025. Sections 4-6 pertain to the process for the SEIS.

1.1 What is USACE proposing to do?

USACE developed the FEIS to consider whether to change current approaches to operations and maintenance of the dams in the Willamette Valley System. USACE concluded the FEIS in April 2025 and issued a record of decision on the interim operations. In May 2025 USACE issued a notice of intent to supplement the FEIS to address new requirements in the Water Resources Development Act of 2024 to analyze a new alternative that ceases hydropower operations in the Willamette Valley System and new requirements in the 2024 National Marine Fisheries Service's Section 7(a)(2) Biological Opinion for the Continued Operation and Maintenance of the Willamette Valley System. .

1.2 What is public scoping?

Public scoping is an early step in the NEPA EIS process when the public is invited to provide information and identify issues and potentially significant effects to be considered in the EIS.

The purpose of the public scoping process for the WVS EIS was to provide information to the public, narrow the scope of analysis to significant environmental issues, serve as a mechanism to solicit agency and public input on alternatives and issues of concern, and ensure full and open participation.

The input that USACE received from the public during the scoping period will inform the analysis of potential effects, alternatives development, and the criteria for evaluation and comparison of alternatives.

2 Public Scoping Process for the Willamette Valley System Operations and Maintenance EIS Development

During the scoping period, USACE engaged with the public and solicited official public comments from a variety of stakeholders such as federal, state, and local agencies, Native American Tribes, and interested groups and individuals for consideration in the development of the Draft EIS. This section of the report provides details on the Notice of Intent (NOI), public outreach tools and methods used, cooperating agencies involved, and public scoping meetings that were held.

2.1 Notice of Intent

The Notice of Intent was for the preparation of an Environmental Impact Statement to address the continued operations and maintenance of the WVS in accordance with authorized project purposes while meeting ESA obligations to avoid jeopardizing the continued existence of listed species. The Notice of Intent was published in the Federal Register on April 1, 2019 and is considered the start of the public scoping comment period. The public scoping period ended on June 28, 2019.

The link for the Notice of Intent can be found here: https://www.federalregister.gov/documents/2019/04/01/2019-06258/notice-of-intent-to-prepare-an-environmental-impact-statement-for-the-willamette-valley-system.

2.2 Outreach

USACE did early outreach for the EIS by publishing press releases, launching the project website (https://www.nwp.usace.army.mil/Locations/Willamette-Valley/System-Evaluation-EIS/), and sharing email notifications and updates through the project distribution list to various stakeholders. The project distribution list is a database developed for this project that includes contact information for interested stakeholders from previous projects and people who requested to be added to receive project updates. The distribution list will be added to and updated throughout the EIS process, and anyone can join. If you are interested in receiving official project updates from USACE, please send a request to the project email address: willamette.eis@usace.army.mil.

Table 2-1 provides more information about the outreach tools.

Table 2-1. EIS Outreach Tools.

Date	Tool	Description
3/19/19	Press release	"Corps begins Willamette Valley System evaluation" https://www.nwp.usace.army.mil/Media/News/Article/1788905/corps-begins-willamette-valley-system-evaluation/
4/1/19	Press release	"Corps issues notice of intent for Willamette Valley System" https://www.nwp.usace.army.mil/Media/News/Article/1802393/corps-issues-notice-of-intent-for-willamette-valley-system-evaluation/
4/1/19	Email notification via distribution list	Notice of Intent
4/2/19	Presentation	Willamette Valley Interagency Recreation Providers
4/4/19	Newspaper article	"Army Corps Set to Environmentally Review 13 Dams in Willamette Valley" https://www.registerguard.com/news/20190404/army-corps-set-to-environmentally-review-13-dams-in-willamette-valley-project
May 2019	Presentations	North Santiam, McKenzie, Middle Fork, and Coast Fork Watershed Councils
May 2019	Flyers	Posted at various USACE project sites
5/11/19	Handouts	Bikes to Bloom event
5/14/19	Press release	"Corps accepts comments for Willamette System Environmental Impact Statement" https://www.nwp.usace.army.mil/Media/News/Article/1847698/corps-accepts-comments-for-willamette-system-environmental-impact-statement/
5/14/19	Email notification via distribution list	Public meeting flyer and public comment portal link
5/21/19	Email notification via distribution list	Correction of link for public comment portal
6/10/19	Presentation	Association of Oregon Counties
6/21/19	Email notification via distribution list	Reminder for end of public comment period

2.3 Cooperating Agencies

As the lead agency for this EIS, USACE has the responsibility to solicit cooperation from other federal agencies, state agencies, and tribes that have jurisdiction by law or special expertise that is relevant to the operations and maintenance of the WVS. The role of these cooperating agencies is to participate in the EIS process by providing technical expertise, comments, and other input throughout the process to help shape the analysis.

USACE invited the following tribes and federal and state agencies to participate as cooperating agencies for the EIS: Confederated Tribes of the Warm Springs Reservation, Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of Siletz Indians, Cow Creek Band of Umpqua Tribe of Indians, Bonneville Power Administration, U.S. Bureau of Land Management, National Marine Fisheries Service, U.S. Bureau of Reclamation, U.S. Forest Service, U.S. Fish and Wildlife Service, Oregon Department of Fish and Wildlife, Oregon Water Resources Department, Oregon Parks and Recreation Department, Oregon Department of Environmental Quality, Oregon Department of Land Conservation and Development, Oregon Department of State Lands, and Oregon Department of Agriculture.

Invitations to participate as a cooperating agency were accepted by the following agencies:

- National Marine Fisheries Service
- U.S. Fish and Wildlife Service
- Bonneville Power Administration
- Bureau of Reclamation
- The Confederated Tribes of the Grand Ronde Community of Oregon
- Oregon Department of Agriculture
- Oregon Department of Environmental Quality
- Oregon Department of Fish and Wildlife
- Oregon Water Resources Department

2.4 Public Scoping Meetings

As part of the public scoping process, USACE scheduled and facilitated five (5) public scoping meetings in June 2019 to engage with and inform the public on the development of the EIS and solicit input and public comments (Figure 2-1). Meetings were held throughout the Willamette Valley to provide an opportunity for interested stakeholders from different communities to attend. Table 2-2 provides the dates and locations for the meetings that were held for this project.

Figure 2-1. Public meeting set-up at the Corvallis-Benton County Public Library.

Table 2-2. Dates and locations of public meetings.

Date	Location
June 4, 2019	Eugene Public Library
June 5, 2019	South Salem High School Library
June 6, 2019	Portland State University Conference Center
June 12, 2019	Corvallis-Benton County Public Library
June 13, 2019	Springfield City Hall
December 6, 2021	Virtual Public Meeting Room
December 12, 2021	Virtual Public Meeting Room
January 19, 2022	Virtual Public Meeting Room
December 6, 2022	Virtual Public Meeting Room
December 8, 2022	Virtual Public Meeting Room

2.5 Public Scoping Meeting Advertisement

Public scoping meetings were advertised through newspaper ads, press releases, flyers, project website, by email notification, and through social media.

USACE advertised the meetings in newspapers throughout the Willamette Valley Basin area to reach a wide variety of stakeholders. Table 2-3 shows the different newspapers where USACE published notices and the dates the advertisements were first shown in the paper.

Table 2-3. Newspaper advertisements.

Date Published	Newspaper
May 15, 2019	The Oregonian
May 17, 2019	Capital Press
May 20, 2019	Albany Democrat Herald
May 20, 2019	Register Guard
May 22, 2019	Woodburn Independent
May 22, 2019	The New Era
May 22, 2019	Cottage Grove Sentinel
May 22, 2019	Suislaw News
May 22, 2019	Statesman Journal
May 23, 2019	Creswell Chronicle
May 23, 2019	Eugene Weekly
May 29, 2019	Lebanon Express
May 29, 2019	Philomath Express
May 29, 2019	Stayton Mail
June 1, 2019	Our Town

2.6 Social Media

USACE used their existing Facebook, Twitter, and Instagram social media platforms to advertise the public scoping meetings (Figure 2-2 and Figure 2-3). Table 2-4 shows the dates that USACE advertised on social media, the platforms used, and how many people were reached and engaged by the posts.

Figure 2-2. Screenshot of June 4, 2019 tweet advertising upcoming public meetings.

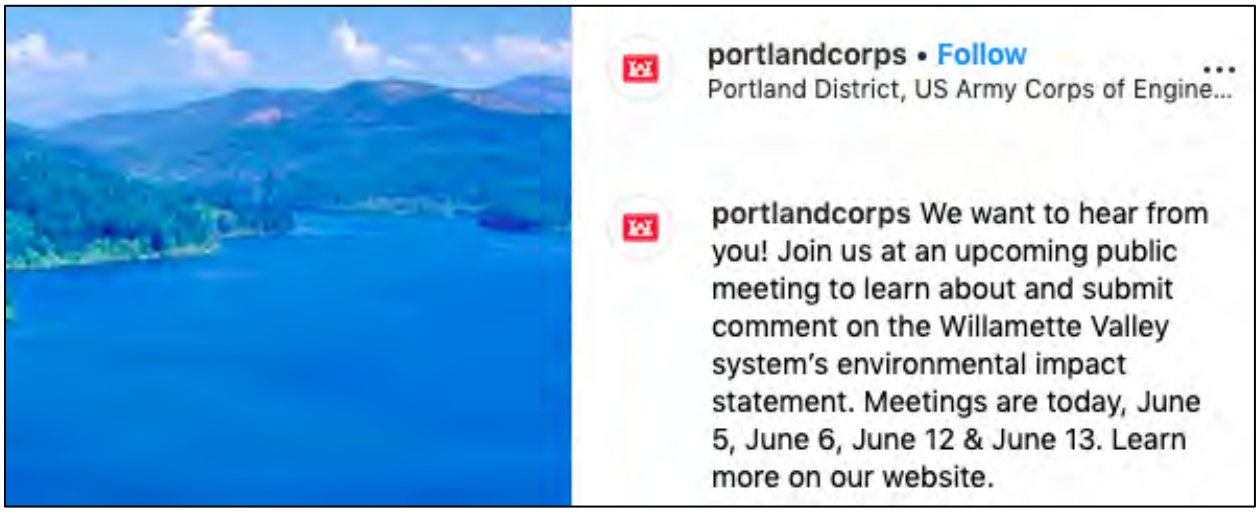


Figure 2-3. Screenshot of Instagram post advertising upcoming public meetings.

Table 2-4. Social media posts.

Date	Platform
June 4, 2019	Facebook, Twitter, Instagram (Reached 69 people, 37 engagements with post)
May 14, 2019	Facebook, Twitter, Instagram (Reached 963 people, 68 engagements with post)

USACE also advertised the public scoping meetings by creating Facebook events with the date, time, and address for each meeting. Table 2-5 provides links to all Facebook events created for the meetings.

Table 2-5. Facebook events.

Meeting Date	Link
June 4, 2019	https://www.facebook.com/events/2206086449704965/
June 5, 2019	https://www.facebook.com/events/424606718088468/
June 6, 2019	https://www.facebook.com/events/2301863913469276/
June 12, 2019	https://www.facebook.com/events/573368076404217/
June 13, 2019	https://www.facebook.com/events/446911029400788/

2.7 Meeting Schedule/Format

Meeting start times alternated between 4:00 p.m. and 5:00 p.m. to accommodate work schedules from members of the public who would likely attend either on behalf of their organization during the work day, or for those who preferred to attend after the work day (Figure 2-4).

USACE used a hybrid meeting format that included both a presentation and one-on-one time with USACE experts. This proved to be beneficial to the public because it provided the opportunity to learn more about the project during the presentation and to talk to USACE staff about any remaining questions or individual concerns one on one. Table 2-6 outlines the meeting format that was followed at each public scoping meeting.

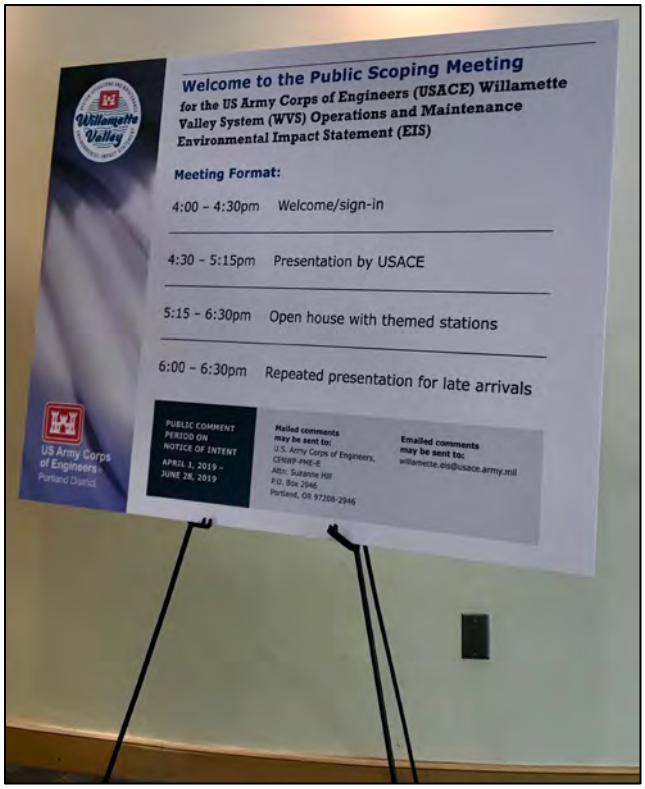


Figure 2-4. Welcome board at the Eugene Public Library.

Table 2-6. Meeting schedule/format.

Time	Agenda Item
4:00 – 4:30pm (or 5:00 – 5:30pm)	Welcome/sign-in
4:30 – 5:15pm (or 5:30 – 6:15pm)	Presentation by USACE
5:15 – 6:30pm (or 6:15 – 7:30pm)	Open house with themed stations
6:00 – 6:30pm (or 7pm – 7:30pm)	Repeated presentation for late arrivals

While the meeting schedule allocated time for a repeated presentation for late arrivals, it did not prove to be necessary as most attendees arrived on time for the first presentation. USACE staff extended the open house with themed stations during the time originally planned for the repeated presentation because most meeting participants stayed after the presentation to speak with USACE staff.

2.8 Meeting Materials

USACE used the following materials to inform and engage the public and to assist them with making effective public comments at the meetings:

- PowerPoint presentation
- Informational/themed poster board stations (Figure 2-5)
- Map of the Willamette Valley System
- Informational handout on the project
- Public comment brochure
- Public comment portal brochure

Figure 2-5. "What is NEPA?" and "Project Background" poster boards, Portland meeting.

2.9 Meeting Participant Data

Figure 2-6 shows how many people attended each of the public meetings (excluding USACE staff). The average number of meeting attendees was 16.4. The meeting in Salem had the highest number of attendees (22) and the meeting in Portland had the lowest (12). Meeting attendees provided meaningful input to USACE through discussions with staff at themed poster board stations and the WVS map.

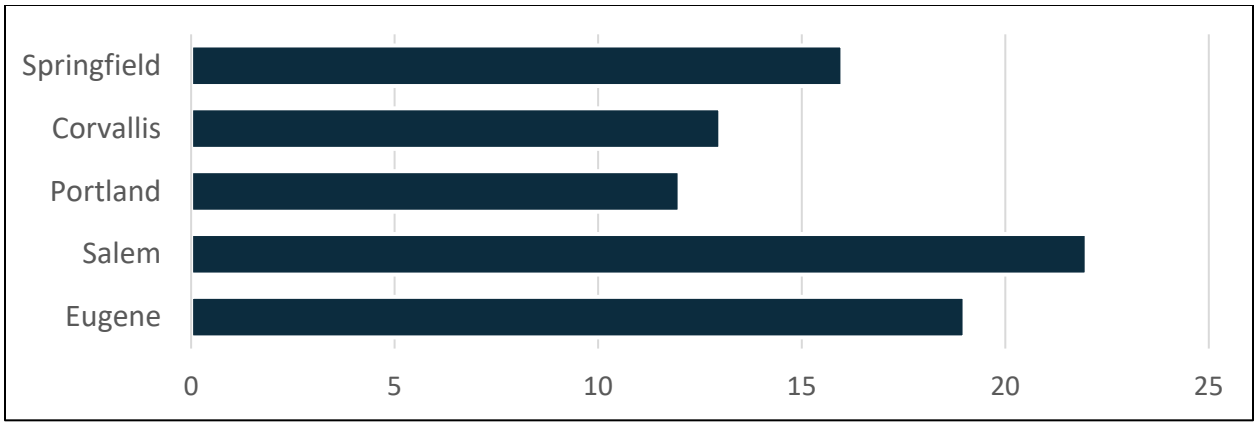


Figure 2-6. Number of participants at each meeting.

Figure 2-7 shows how public meeting attendees heard about the meeting, based on data collected from meeting attendees on the sign-in sheet. Most meeting attendees indicated they heard about the meeting from "Other" (45 percent), which some explained as word of mouth, walk-in, and USACE staff members.

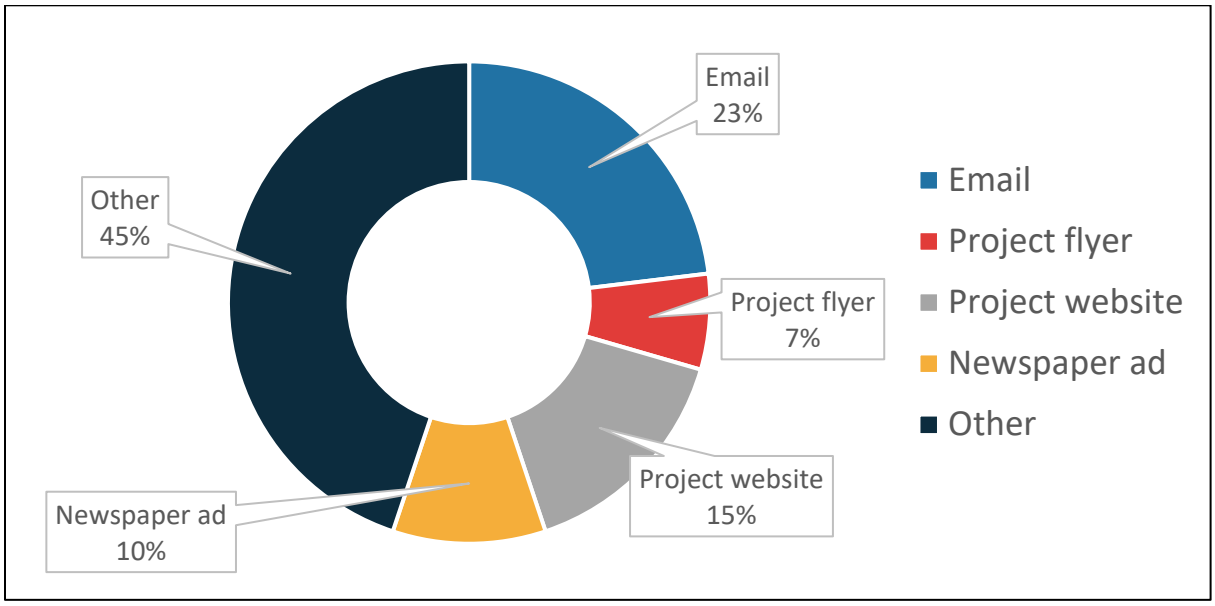
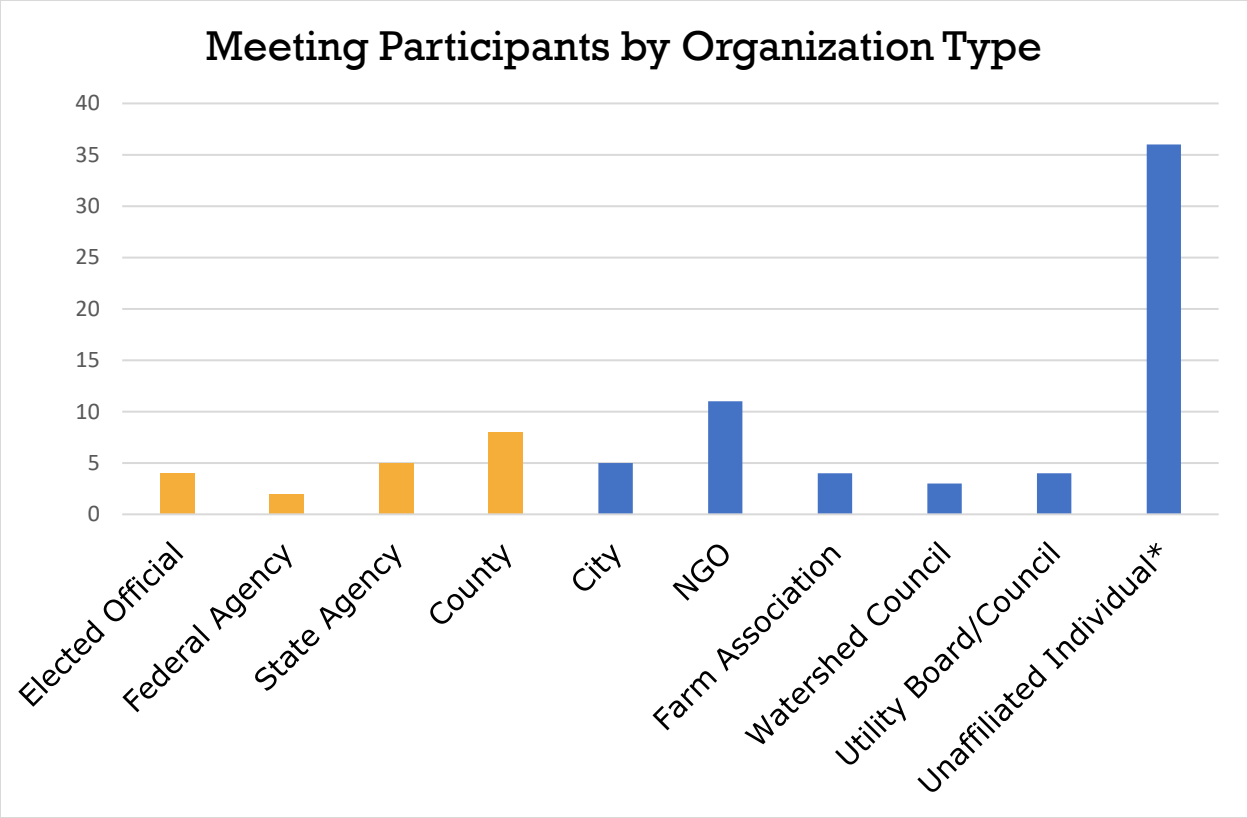


Figure 2-7. Meeting notification source.

Most of the meeting attendees indicated residency in Eugene (21), Salem (16), Portland (10), and Springfield (6). Other meeting attendees came from Dorena, Veneta, Junction City, Woodburn, Dallas, St. Paul, Silverton, Canby, Oak Grove, Hillsboro Sherwood, Independence, Tangent, Corvallis, Oregon City, Albany, Cottage Grove, and Monmouth.

Due to the large scope of the project, USACE anticipated a variety of stakeholder types to attend public meetings. Figure 2-8 shows the number of meeting attendees by organization type affiliation and confirms that there is interest in the project from a variety of stakeholders.



*Private citizens and meeting attendees that left the organization column blank are shown as "Unaffiliated Individual" in the bar graph.

Figure 2-8. Number of meeting attendees by organization type.

Meeting participants were also given the option to sign up for the project email distribution list while filling in the sign-in sheet at the beginning of meetings to stay informed on project updates. A total of 32 meeting attendees signed up for the distribution list.

3 EIS Public Scoping Comment Summary

Public scoping comments received by USACE during the scoping period were compiled and added to a Microsoft Excel database for organization, summary, and analysis. USACE received a total of 384 comments. These comments were contained in 92 unique correspondence documents (e.g., email, comment brochure, map comment, etc.). Because correspondence documents often contained multiple comments on different topics, each document was reviewed for specific comments and organized accordingly. These comments were used to inform the scope of analysis, alternatives development, and impacts to resources in the Draft EIS.

3.1 Comment Collection Methods Used

USACE accepted public comments via mail (U.S. Army Corps of Engineers, CENWP-PME-E, ATTN: Suzanne Hill, P.O. Box 2946, Portland, OR 97208-2946), project email (willamette.eis@usace.army.mil), the public comment portal (https://cenwp.maps.arcgis.com/apps/CrowdsourceReporter/index.html?appid=62723471dc7444f8a7256aa59f79926a), public comment brochures distributed and collected at meetings, and at meetings with a USACE staff member using a map. Comments posted on social media are not considered official public comments and are not included in this report; USACE clearly indicates in social media postings that comments on social media posts are not considered official public comment and social media posts direct users to the project website to learn how to submit official public comments.

3.2 Public Scoping Comment Analysis Process

All public comments received were treated equally with respect to their summary, analysis, and consideration regardless of the affiliation of the commenter, correspondence type, comment content, comment topic, or length of correspondence.

The comment analysis process began with organizing correspondence received during the public scoping period and assigning them with document IDs. All correspondence documents were read in their entirety by the content analyst, and then broken down into separate comments by individual topic/concern and assigned a comment ID number. Comments were then added to the comment database where they were summarized and assigned one topic and up to three subtopics.

3.3 Public Scoping Comment Submission Received (Number of Correspondences)

Figure 3-1 shows the number of comments received by correspondence type, demographic, topic, and subtopic.

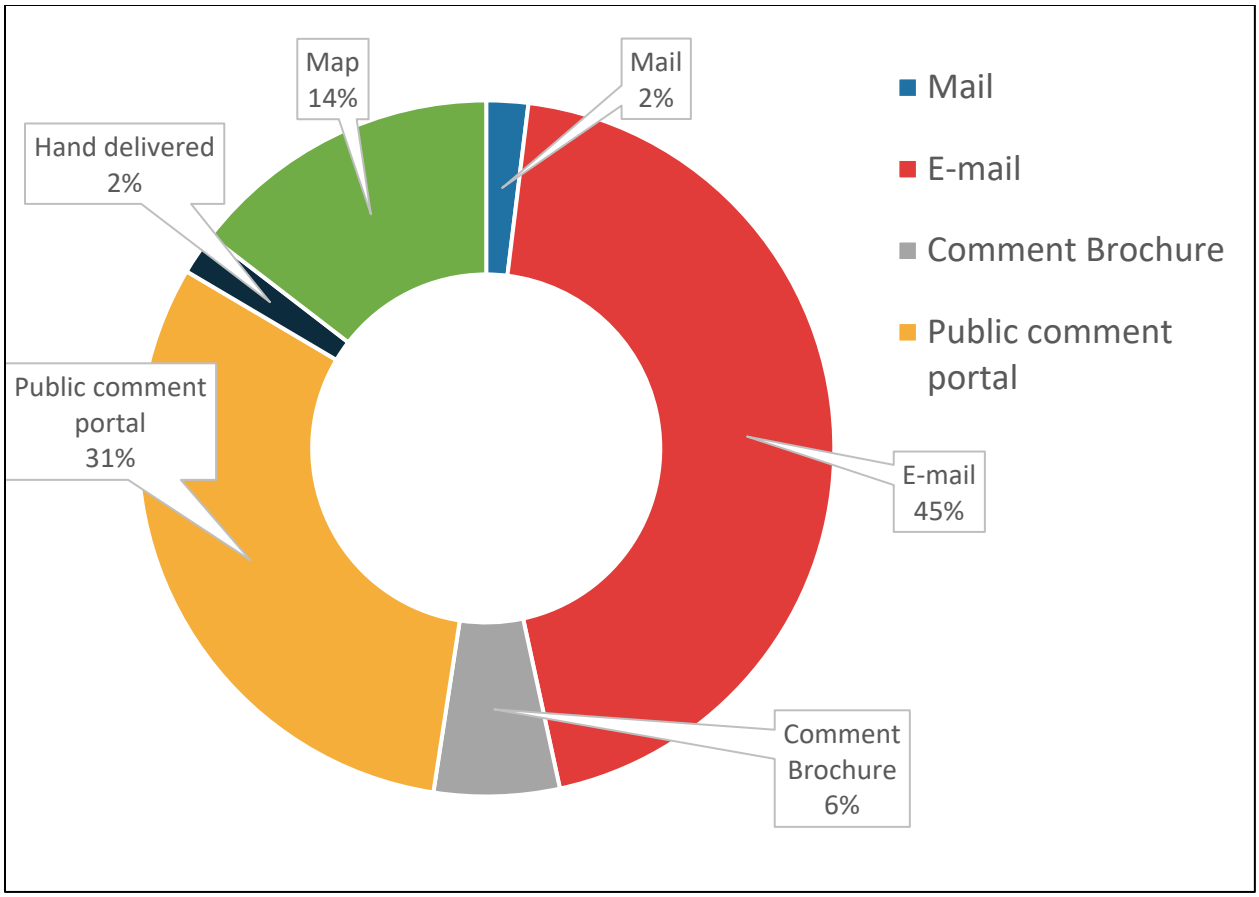


Figure 3-1. Comments received on EIS by correspondence type.

The majority of comment documents were received via email, followed by the public comment portal. Comment documents were also received at the public scoping meetings via the map and comment brochure. A small number of comments were delivered by hand or sent by mail.

As stated previously in the *Meeting Participant Data* section, USACE anticipated a variety of stakeholder types to submit public comment documents because of the large scope of the project. As Figure 3-2 shows, the majority of comment documents came from unaffiliated individuals (50 correspondences), followed by NGOs (12 correspondences), and watershed councils (11 correspondences). The remaining comment documents were submitted on behalf of other organizations in small numbers (less than 8 correspondences) from various stakeholder groups, including comment documents representing tribal interests and from individuals associated with agricultural groups or individual farms.

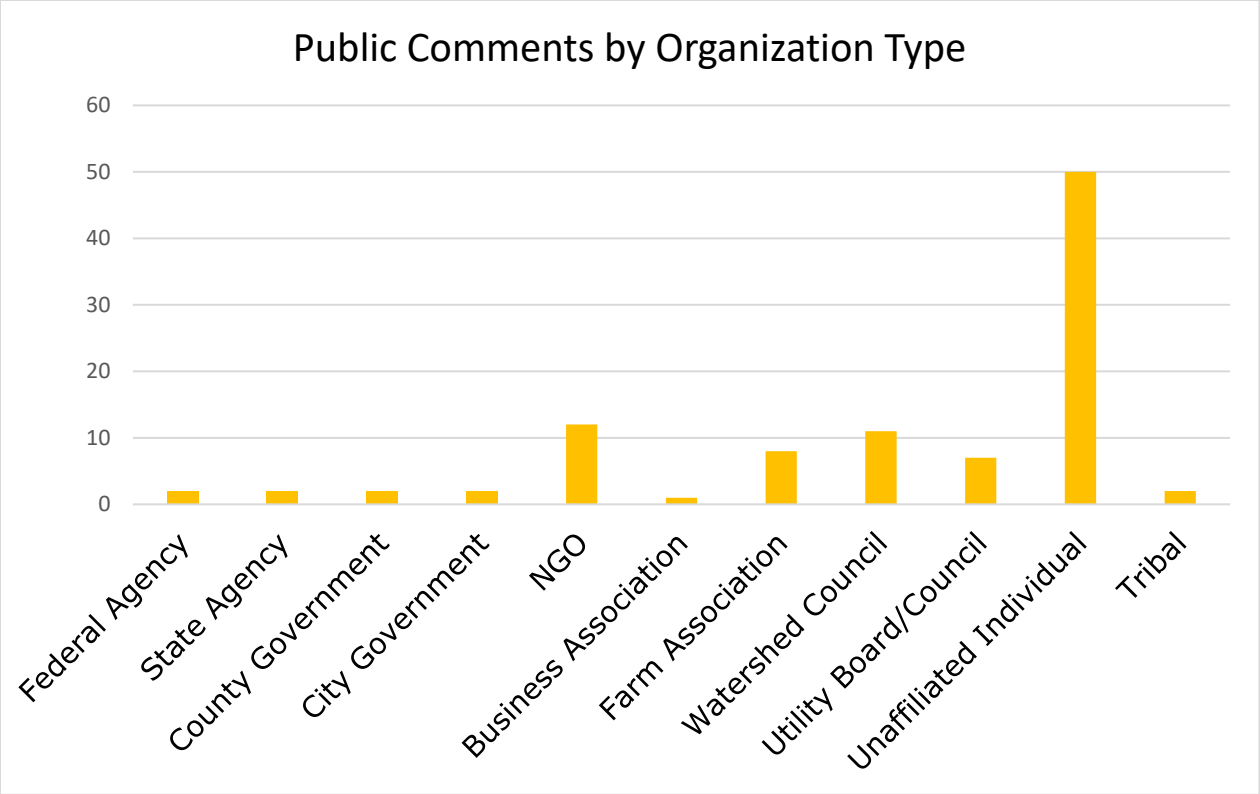


Figure 3-2. Public comment on EIS by organization type.

The following topics were identified in reviewing public comments: Alternatives (such as new suggested alternatives or factors to consider when developing alternatives), authority (such as USACE's regulatory authority), EIS general (such as comments relating to the EIS and project but not about a specific alternative or environmental impact), environmental impacts (such as comments relating to how a resource is impacted by operations and maintenance), and mitigation (such as suggestions for mitigating toxic algae).

These topics emerged as themes throughout the 384 comments received (Table 3-1). A topic of "not a comment about the EIS" was also identified to capture comments that were unrelated to this project or outside of the scope. Most comments pertained to alternatives to the project. The next most commented on topics were environmental impacts (90 comments) and EIS general (86 comments).

Table 3-1. Comments received by topic.

Topic	Number of Comments Received
Alternatives	183
Authority	10
EIS general	86
Environmental impacts	90
Mitigation	5
Not a comment about the EIS	10

The comments were further categorized under one to three subtopics to allow USACE to better understand the input received from the public (Table 3-2). This section describes the subtopics that were addressed in the majority of comments because they represent the issues that many stakeholders are concerned about but is not intended to fully capture all concerns or ideas raised. The full list of subtopics and associated number of comments submitted for each can be found in Table 3-2. Below is a summary of the most predominant subtopics that were identified.

Table 3-2. Comments received by subtopic.

Subtopic*	Number of Comments Received
Adaptive management	5
Air quality	1
Analytical methods	1
Climate change	15
Cooperating agencies	4
Cultural resources	2
Cumulative effects	6
Dam removal	8
Dam safety	1
Ecosystem services	5
Education/outreach	1
ESA	136
Fish and wildlife	12
Flood risk management	48
Habitat	6
Hatchery	8
Health and safety	1
Hydrology	1
Hydropower	15

Subtopic*	Number of Comments Received
Navigation	3
NEPA process	49
No action	8
Public involvement	19
Purpose and need	1
Potentially affected groups/individuals	11
Recreation	28
Revetments	24
Rule curve	6
Socioeconomics	27
Transportation	5
Tribal interests	19
Vegetation	5
Water storage and allocation	48
Water quality	25

*Each comment was assigned one to three subtopics. A total of 555 subtopics were assigned to 384 comments.

3.3.1 Endangered Species Act

One hundred thirty-six comments were received regarding ESA listed species and/or compliance. Overall, commenters were concerned with operation impacts and dam infrastructure on anadromous fish and interrelated threats. Concerns ranged from interruptions to fish migration patterns to general ecosystem impacts. Many comments also focused on how water conditions (flow, pollution, temperature, barriers) will impact fish passage and generally affect fish populations.

3.3.2 Flood Risk Management

Forty-eight comments were received regarding flood risk management. Comments on this subtopic included suggestions to retain or improve current systems that assist with flood protection. Some comments pertained to preserving economic activities and human resources, while other comments suggested that USACE balance flood mitigation with the needs of fisheries and wildlife habitats. Comments in this subtopic also addressed threats to farming activities and agricultural livelihoods from floods and many comments advocated for USACE to consider impacts on agricultural activities in the EIS.

3.3.3 NEPA Process

Forty-nine comments pertained to the NEPA Process. These comments focused on the scope of the EIS, the review process, and what elements USACE would be taking into consideration in the analysis, including other ongoing NEPA analyses in the WVS. For example, some comments related to the definition of the No-action Alternative and the baseline conditions for the EIS. Other comments addressed the potential cumulative impacts of operations and maintenance of the dams on natural resources and ecosystems. Many comments pertained to the scope of the EIS and what it should include. For example, some commenters advocated for the EIS to incorporate recent research on fish habitats, and consider water allocation and storage, and water flows.

3.3.4 Water Storage and Allocation

Forty-eight comments were received regarding water storage and allocation. Comments were submitted both advocating for and against adjustments to water storage capacity and allocation. Multiple repeat comments (submitted via form letters from farmers) advocated for water storage and sufficient supply to meet growing irrigation demands. Multiple comments focused on how a decrease in water allocation to their region would negatively impact their community. For example, comments addressed the need for access to drinking water and expressed general concerns regarding potential economic impacts to local communities and industries. Several comments raised concerns that water storage and allocation changes could negatively impact fish habitat and fish populations.

3.4 Summary Table: Public Scoping Comments

Table 3-3 provides a summary of the comments received during the scoping period. The summary table includes the main suggestions, issues, and concerns from public comments organized by topic (alternatives, authority, EIS general, environmental impacts, and mitigation). For the purposes of this table, comments were summarized together and identified as "Several" when more than one commenter expressed the same or similar concern. All comment documents received for the scoping period are included in Attachment J of this report.

Table 3-3. Public scoping comment summary*.

Commenter	EIS Subject	Comment Verbatim or Comment Summary
Several	Alternatives	Operations and maintenance in the WVS need to be modified to protect the ESA-listed species.
Several	Alternatives	Consider and evaluate alternatives that modify, reduce, or eliminate hydropower production.
Several	Alternatives	Consider alternatives that modify dams not vital for flood control to operate as run-of-river or analyze
Several	Alternatives	Consider altering the rule curves to benefit needed flows for ESA-listed species while maintaining the
Several	Alternatives	Consider alternatives that include both expedited, interim measures to aid in the survival of the ESA
Several	Alternatives	Consider action alternatives in subbasins that take into account drawdown for fish passage and
Several	Alternatives	Consider measures to improve juvenile dam passage survival, including cost-effective options to meet
Several	Alternatives	Consider measures to reduce total dissolved gas levels.
Several	Alternatives	Need to maintain the system for flood control and irrigation storage. Concerns regarding water
Several	Alternatives	Need to develop process for USACE to work with landowners when a revetment fails to determine if
Several	Alternatives	During the fall drawdown, consider ways to optimize flows for boating and whitewater paddling.

Commenter	EIS Subject	Comment Verbatim or Comment Summary
Several	Alternatives	USACE should improve boater access points and better communicate with law enforcement regarding river access.
Several	Alternatives	Consider additional recreational releases, especially during summer months, for boaters and whitewater paddling.
Several	Alternatives	Consider environmental impacts of revetments and evaluate alternatives to address problems caused by them.
Several	Alternatives	Examine opportunities to remove/modify revetments to increase extent and duration of floodplains and off channel habitats and provide ecological benefits with a low risk to infrastructure.
Several	Alternatives	EIS should examine flow operations that protect infrastructure while balancing water quality and habitat needs for native species.
Several	Environmental Impacts	Consider the impact of hatcheries on wild fish and the natural ecosystem with any proposed alternatives.
Several	Environmental Impacts	Concerns of shoreline/bank erosion because of risk of landslides and land that is being lost.
Several	Environmental Impacts	Evaluate how any modifications to operations and maintenance and flow will impact boating facilities, navigation, floating structures, and safety.
Several	Environmental Impacts	USACE should consider the recreational and human health value of Fern Ridge Reservoir for sailing and other water sports.
Several	Environmental Impacts	USACE should consider drinking water needs of reliant communities.
Several	Environmental Impacts	Evaluate the impact of algae blooms on drinking water and recreation.
Several	Environmental Impacts	Consider/evaluate impacts of recreational fishing on listed fish.
Several	EIS General	Concern regarding USACE maintenance of revetments and erosion.
Several	EIS General	USACE should consider building in a review and update process into WVS operations, to take advantage of new information as it is being made available, or at some predetermined time frame.
Several	EIS General	Incorporate recent research on river processes and habitat needs from the research facilities in the Willamette Valley such as University of Oregon SLICES Framework, cold water refuge and geomorphic mapping, fish distribution, and Willamette Water 2100 modeling results.

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Willamette Salmon Steelhead Recovery Coalition	Alternatives	Flows: How will flow targets be defined? How will the ongoing reallocation process inform the development of alternatives in this process? If it will be integrated, then how does the fact that NMFS determined the proposed reallocation would result in jeopardy get resolved in advance of the Systems analysis without derailing the proposed timeline for this process and the formulation of the next Biological Opinion? Will flow targets for fish (or at least listed fish) be met even in shortage years? Doesn't it make sense to postpone reallocation and make it part of the new Biological Opinion/EIS process? Will the EIS consider and propose administrative structures for contracts to protect water released for fish from diversion downstream under "live" flow water rights?
Willamette Salmon Steelhead Recovery Coalition	Alternatives	How will the COP II report inform alternative development and NEPA analysis?
Willamette Salmon Steelhead Recovery Coalition	Alternatives	At the February 22, 2019 event, Corps and BPA reps indicated that the agencies are considering alternatives for hydropower production at Cougar Dam and for the Willamette Project to assist in downstream passage and necessary recovery measures. What modifications to hydropower are being evaluated? Are agencies considering eliminating peaking power, modifying power operations to provide downstream volitional passage routes for listed fish (i.e., turning turbines off and performing drawdowns during peak migratory periods), or consider changes or removal for the non-flood control reregulating dams (Big Cliff and Dexter) to assist with fish passage and recovery efforts?
Willamette Salmon Steelhead Recovery Coalition	Alternatives	Will the Corps review/remodel rule curves? Will analysis include consideration of run of the river, delayed refill, or drawdowns to facilitate juvenile downstream passage and support recovery efforts?
Willamette Salmon Steelhead Recovery Coalition	Authority	Will the Corps commit to requesting and allocating funds necessary to sustain sufficient research and monitoring needs?
Willamette Salmon Steelhead	Authority	How will the Corps address the different authorities that often result in operational conflicts for the projects in the analysis? Will the Corps consider operations and maintenance changes that impact the fulfillment of authorized purposes (other than flood control and human health/safety) if they assist

Commenter	EIS Subject	Comment Verbatim or Comment Summary
Recovery Coalition		with meeting ESA obligations? What are the specific recovery actions that the Corps may implement but lack sufficient legal authority? Will the agency seek Congressional approval and what is the timeline?
Willamette Salmon Steelhead Recovery Coalition	EIS General	USACE failed to proceed with implementation of the Proposed Action analyzed through NEPA regarding drawdown operations at Lookout Point Dam to assist in juvenile downstream passage. Analyze drawdown operations at Lookout Point Dam.
Willamette Salmon Steelhead Recovery Coalition	EIS General	Why has the agency failed to meet the 2008 Biological Opinion timeline and initiate the required actions relating to downstream passage in Middle Fork Willamette? How can the agency assure Congress and the public that future timelines will be met? What actions from the 2008 Biological Opinion will be taken in the interim of the new Biological Opinion?
Willamette Salmon Steelhead Recovery Coalition	Environmental Impacts	Volitional vs. Non-Volitional Downstream Passage: Given difficulties with similar fish collection projects like Pelton Round Butte and Lewis River, why does the Corps expect the proposed fish collection projects will be successful? Has the Corps analyzed whether the flows and effective forebay sizes of Detroit and Cougar will yield sufficient collection efficiencies to support the agency's claims? Has the Corps analyzed the impact of copepod-related morbidity of volitional vs. non-volitional passage routes? Why did the Corps exclude the volitional bypass pipe proposal from Cougar project's NEPA analysis? What are the projected ongoing costs associated with these non-volitional proposals?
Willamette Salmon Steelhead Recovery Coalition	Environmental Impacts	Cougar Downstream Passage: A prototype fish collector was evaluated at Cougar with results indicating that the collection efficiency of juvenile downstream migrants was quite low; why will the current design be more successful? What are the expected collection efficiencies? Will the collection rate be significantly superior to volitional routes via reservoir drawdowns that have been evaluated in the past? The Corps noted that drawdowns and passage through the diversion tunnel may not be feasible due to structural issues. Could these infrastructural issues be resolved through redesign or engineering?
Willamette Salmon Steelhead Recovery Coalition	Mitigation	Address mitigation obligation at present given constraints to hatchery production identified in the draft Hatchery Genetic Management Plans (HGMPs). Address how the USACE obligation could change over the timeframe for the analysis period.
U.S. EPA Region 10	Alternatives	Identify and select alternatives that maximize environmental benefits, and avoid, minimize, and/or otherwise mitigate environmental impacts. We support actions that restore natural processes and

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		recommend that you consider an EIS alternative that maximizes opportunities to restore natural hydrologic, geomorphic, and biological processes.
U.S. EPA Region 10	EIS General	Describe tribal consultation in terms of identifying affected tribes, notification, tribal input, and follow-up to demonstrate consistency with EO 13175.
U.S. EPA Region 10	EIS General	Show evidence that basic steps for effective public involvement have been taken.
U.S. EPA Region 10	EIS General	Include a statement of purpose and need (P&N) consistent with implementing regulations for NEPA and involve interested agencies and stakeholders in the development of the P&N statement.
U.S. EPA Region 10	Environmental Impacts	Consider different dam operations and maintenance scenarios on current and predicted water temp, hyporheic flow, and reductions in river flow rate.
U.S. EPA Region 10	Environmental Impacts	Contaminants found in river systems like PCBs, PAHs, PBDEs, DDT, and other legacy pesticides, mercury, current use pesticides, pharmaceuticals, and personal care products and trace elements can impair water quality, affect aquatic organisms like insects and salmon and resident fish and impair environmental and human health. Include impacts of reservoir operations and maintenance on mobilization and transformation of inorganic mercury and methylmercury. Include impact of reservoir stratification, food web dynamics/fish stocking, vegetation management, nutrient loading, and water-level fluctuations on methylmercury production and bioaccumulation. Analyze how reservoir operations might be altered to reduce methylmercury production and bioaccumulation.
U.S. EPA Region 10	Environmental Impacts	Disclose water quality standards, including State's numeric standards, narrative standards, designated uses, and antidegradation provisions. Identify and disclose current water quality of water bodies likely to be impacted by the project, nature of potential impacts, and specific discharges and pollutants likely to impact the waterbodies. Analyze effects of operations and maintenance on surface water temps, total dissolved gas, pH, dissolved oxygen, sediment quantity and quality, and nuisance algae. Use models to analyze temp, dissolved oxygen, and nuisance algae in reservoir and downstream.
U.S. EPA Region 10	Environmental Impacts	Describe relevant TMDL allocations, the water bodies to which they apply, and associated water quality standards and pollutants of concern. Identify water bodies with approved TMDLs that remain impaired. Identify waterbodies potentially affected by the project that are listed as impaired on the State of Oregon's most current EPA-approved 303(d) list. Include measures to control existing sources of pollution to offset additional loading if additional pollutant loading is predicted because of the project. Describe restoration and enhancement efforts for impaired waters, how the proposed project will coordinate with ongoing protection efforts, and mitigation measures. Use information from the 2006 Willamette River Basin Mercury TMDL revision process in the EIS for mercury cycling,

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		for example the Mercury TMDL Development for the Willamette River Basin (Oregon) Technical Support Document.
U.S. EPA Region 10	Environmental Impacts	Describe how Clean Water Act (CWA) antidegradation requirements will be met.
U.S. EPA Region 10	Environmental Impacts	Describe alternatives effects on sediment loads in reservoirs: characteristics, location, transport; physical and chemical characteristics throughout the affected watershed.
U.S. EPA Region 10	Environmental Impacts	Though no CWA 404 permit is issued for discharges associated with Corps civil works projects, we recommend that the admin record demonstrate and document compliance with CWA Section 404(b)(1) guidelines for disposal sites for discharges or dredged or fill material into waters of the United States (WOTUS). Identification of LEDPA is achieved by performing an alternatives analysis that estimates the direct, secondary, and cumulative impacts to jurisdictional waters resulting from each alternative considered. An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics. The admin record should be sufficiently detailed to identify the LEDPA. Under the guidelines, discharges of dredged or fill material are not permitted if they will cause or contribute to significant degradation of WOTUS. Guidelines establish specific approaches to evaluate effects on: human health or welfare; the life stages of aquatic life, other wildlife dependent on aquatic environment; aquatic ecosystem diversity, productivity, and stability; recreational, aesthetic, and economic values.
U.S. EPA Region 10	Environmental Impacts	Consider adverse and disproportionate impacts to minority and low-income populations regarding exposure to environmental hazards.
U.S. EPA Region 10	Environmental Impacts	Discuss reasonably foreseeable effects on changes in climate on the proposed project and project area including on long-term infrastructure to inform development of measures to improve the resiliency of the proposed project. If climatic changes exacerbate environmental impacts of the project, consider these impacts in the EIS.
U.S. EPA Region 10	Environmental Impacts	Evaluate and disclose air quality implications from power production—each alternative will fit differently into the energy production portfolio of the Northwest. The EIS should consider the emissions associated with various configurations, and articulate assumptions about how and from where power would be sourced in the absence of hydropower production. Evaluate emissions associated with maintenance dredging operations at the dams; and emissions associated with internal combustion engines used in operations and maintenance.

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U.S. EPA Region 10	Environmental Impacts	Utilize project-specific thresholds for level of impact and apply to EIS analysis of environmental impacts as a strategy for meeting the intent of Council on Environmental Quality's (CEQ's) NEPA regs.
U.S. EPA Region 10	Environmental Impacts	Resources, ecosystems, and communities should be characterized in terms of their response to change and capacity to withstand stresses. Focus on resources that are "at risk" or have the potential to be significantly impacted by the proposed project.
U.S. EPA Region 10	Environmental Impacts	Discuss and estimate the potential for reduced ecosystem functions from a less dynamic floodplain downstream.
U.S. EPA Region 10	Environmental Impacts	Assess impact and changes on ecosystem services relative to baseline and integrate analysis into decision making.
Columbia River Inter-Tribal Fish Commission	Alternatives	Alternatives should use a range of fish metrics and data, including reach survival, project survival, and delayed mortality using various models and tools and not just the COMPASS model.
Columbia River Inter-Tribal Fish Commission	Alternatives	Consider alternatives to improve flow and migration for juvenile and adult lamprey, an important food source for tribes in the basin.
Columbia River Inter-Tribal Fish Commission	Alternatives	Corps should explore how its ecological mission for biodiversity and mitigating the impacts of Corps infrastructure can be strengthened through cultural diversity and the knowledge and skills held by Native peoples.
Columbia River Inter-Tribal Fish Commission	EIS General	Willamette River Reallocation EA models show Biological Opinion flow requirements are not consistently met and are missed significantly in years of insufficient water availability.
Columbia River Inter-Tribal Fish Commission	EIS General	Federal agencies must use their authorities to protect and enhance, not degrade, fish species that underlie treaty fishing rights. Northwest tribes by virtue of treaty have co-management status on fisheries resources and are required to have meaningful consultation on actions, including non-tribal fisheries, hatchery production, protection of natural spawning environment, and protection of downstream and upstream migration.
Columbia River Inter-Tribal Fish Commission	EIS General	Salmon and lamprey are tribal cultural resources that play an integral part of tribal religion, culture, and physical sustenance and of the economies of the region for thousands of years. Salmon are important for the ecosystem. USACE will need to work closely with Columbia River Intertribal Fish Commission during analysis of cultural resources.

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Columbia River Inter-Tribal Fish Commission	EIS General	Climate change was not thoroughly taken into consideration in the Willamette River Basin EA. Evaluation is essential to an accurate WVS operations and maintenance EIS. Assess the possibility that reservoirs may not adequately fill since tributaries such as the North Santiam River are snowpack-driven, which may be affected differently than rain-driven tributaries. Climate change will affect local flows and the timing of flows to meet Biological Opinion objectives. Water temperature will also be affected. Lamprey, steelhead, and Chinook salmon may require more flow.
Columbia River Inter-Tribal Fish Commission	Environmental Impacts	Consider how shifting water flow will affect quality of the basin by diluting pollutants, affecting water temperature, and availability of dissolved oxygen for aquatic species. Consider impact on ESA-listed steelhead and Chinook salmon reliance on flow to dilute concentrations of toxins.
Columbia River Inter-Tribal Fish Commission	Environmental Impacts	Consider the effects of the hydropower system on reservoir ecology such as invasive species, algae, seaweed, altered flood dynamics, sequestration of sediment, sand bars, water quality issues, and changes in temperature.
Columbia River Inter-Tribal Fish Commission	Environmental Impacts	Look at cumulative impact of this and other ongoing projects in the Willamette Basin to address mitigation needs for lamprey.
Columbia River Inter-Tribal Fish Commission	Environmental Impacts	Analyze socio-economic benefit that mitigation-funded tributary actions have on local communities, both tribal and non-tribal, and how those benefits change under various alternatives.
WaterWatch of Oregon	Alternatives	Consider which regulated flows could be shifted more toward the historical natural hydrograph and the impacts on fish, wildlife, and flood risk, including how temperature and flow variability effect [sic] fish populations and migration, to determine whether there is any correlation with variations from expected unregulated flow vs. particular flow levels.
WaterWatch of Oregon	Alternatives	Evaluate alternatives that do not reserve water in reservoirs for power pools and minimum storage. That could make more water available to meet downstream flow needs and better allow reservoir “drawdown” to aid fish migration.
WaterWatch of Oregon	Alternatives	Consider alternatives for protecting stream flows for the benefit of fish and wildlife. Consider transferring portions of USACE water storage rights to instream water rights (note, this is different from creating instream water rights for the use of stored water). Consider strategies for protecting stored water released for instream use from being diverted downstream.
WaterWatch of Oregon	Alternatives	Consider modifications to the rule curves to accommodate consideration of additional flow scenarios.

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WaterWatch of Oregon	Authority	Consider whether USACE has regulatory authority to help mitigate for impacts of dams in the Willamette Basin.
WaterWatch of Oregon	EIS General	Willamette Basin Review to reallocate storage space in reservoirs should be delayed and merged into this process for further consideration. This EIS and NMFS Biological Opinion will better inform how reservoir storage capacity should be allocated. Delay would be minimal relative to timeline for allocation and could be used to implement actions in anticipation of reallocation, such as creating mechanisms to protect stored water released for fish from downstream diversions. Allowing reservoir reallocation to proceed separately would represent an irreversible and irretrievable commitment of resources.
WaterWatch of Oregon	Environmental Impacts	Consider impacts of WVS [WVP] on all species of fish, wildlife, and plants, not just those threatened and endangered such as cutthroat trout, coho salmon, lamprey, amphibians, and plants.
WaterWatch of Oregon	Environmental Impacts	Include flow modeling using the most recent flow data and expected future impacts of climate change. A new flow dataset through 2018 is or should be soon available. Modeling should evaluate flows under numerous different scenarios for operation of the reservoirs, including proposed reservoir allocations to agricultural irrigation and municipal and industrial use.
Andrew Chione	Alternatives	Native fish conservation should be prioritized over hydropower due to decline in hydropower value and critical situation of ESA-listed fish species.
Andrew Chione	EIS General	Coordinate with state agencies to conduct water quality sampling on reservoirs in the Willamette system, especially those that have drinking water intakes downstream. The water crisis in Salem last year should be a wake-up call to better monitor cyanobacteria blooms for public safety.
Center for Biological Diversity, et al.	Alternatives	EIS should include a full analysis of changes that give salmon recovery a high priority and assess any action for effects on salmon availability for Southern Resident orcas. USACE should review the recovery plan and use its authorities to rebuild depleted populations of salmon and other prey to ensure an adequate food base for recovery of the orcas.
Center for Biological Diversity, et al.	Environmental Impacts	EIS should consider the survival of both ESA-listed salmon in the Willamette Valley and the Southern Resident killer whale (orca) population by reviewing the best available science to determine whether the proposed operations and maintenance should be modified and mitigated to address the dramatic decrease in salmon populations compared to historical numbers and the impact of this decline on other ESA-listed species that depend on the salmon as a significant food source, such as the Southern Resident orcas.

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Long Tom Watershed Council	Alternatives	Consider the merits of providing both upstream and downstream fish passage at Fern Ridge, including the harm in facilitating the movement of non-native fish above dam versus the benefits of providing greater connectivity for native species throughout the system.
Long Tom Watershed Council	Alternatives	Evaluate opportunities for flood risk mitigation and complementary needs for floodplain habitat restoration to address flood control and habitat enhancement simultaneously.
Long Tom Watershed Council	Alternatives	Habitat value of Amazon Creek diversions and opportunities for resource enhancement (if any) through a more naturalized channel should be evaluated.
Long Tom Watershed Council	EIS General	Partnership Funding: The Corps should, where appropriate, seek to expand the opportunities for public/private partnership to leverage technical expertise and community engagement capacities of local partners, and simplify the process through which local Army Corps staff can direct discretionary funding to address critical needs and capitalize upon partnership opportunities locally.
Long Tom Watershed Council	EIS General	Opportunities exist to improve and restore habitat function in the lower Long Tom while supporting the flood risk mitigation mission of the Fern Ridge project.
Long Tom Watershed Council	Environmental Impacts	Concern for three check dams below Fern Ridge reservoir that are barriers to resident native fish movement throughout the system and into tributaries.
Long Tom Watershed Council	Environmental Impacts	Consider invasive species control measures, such as seasonality of growth and preferential control methods, etc., when considering the impacts of dam operations.
McKenzie Flyfishers	Alternatives	Variation in the timing of outmigration among and within species could favor volitional fish passage systems and advantages and disadvantages should be carefully evaluated for each program.
McKenzie Flyfishers	Alternatives	Need to assure that fish passage programs support above-dam wild fish sanctuaries. Most fish passage program documentation does not specify procedures to assure that fish moving above formerly barrier dams are actually wild fish, consistent with ESA-listed designations.
McKenzie Flyfishers	Alternatives	USACE Willamette Project documents have not shown estimates of likely effects of climate change or how this could impact the allocation of water. Management and maintenance of dams should have sufficiently flexible policies and procedures to deal with climate change uncertainties and not be constrained by rigid parameters such as fixed curve rules, which can make accommodations difficult.

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McKenzie Flyfishers	Environmental Impacts	Concern that the populations of ESA threatened species could be extirpated within the next 10 years.
McKenzie Flyfishers	Environmental Impacts	Concern that any management policy for water allocation must meet standards in the forthcoming NMFS Biological Opinion and that changes in water management must consider recovery of the basin fishery and obligations under ESA.
McKenzie Flyfishers	Mitigation	Monitor each juvenile fish downstream passage project carefully due to the uniqueness of each project's rearing habitat, reservoir conditions, and dam structure to assure that the project is proven to contribute to the recovery of the local fishery.
NOAA Fisheries West Coast Branch	Alternatives	Recommend the Corps define their No-action Alternative using the current status quo and not include the large fish passage and water quality structures that are still being designed and are not currently funded. When developing alternatives, include a broader range of actions that may reasonably occur, such as elements that may be required by the next Biological Opinion.
NOAA Fisheries West Coast Branch	Alternatives	Action alternatives systemwide: improve or replace some adult release above dams; maintenance of mainstem Willamette River juvenile monitoring/sampling facility; interim passage operations prior to completion of downstream passage facilities; installation and maintenance of new instream flow gages; research regarding passage design and effectiveness at new facilities and in subbasins with new adult reintroductions above dams; structural improvements to reduce water quality impacts during emergency and unusual events; additional habitat improvement/restoration projects in the lower tributaries and mainstem.
NOAA Fisheries West Coast Branch	EIS General	Recommend the Corps revise the schedule by reducing the timelines for completing the Record of Decision (ROD) to April 1, 2021, or as near to that date as possible per EO 13807, Establishing Discipline and Accountability in the Environmental Review and Permitting Process or Infrastructure Projects, or explain the circumstances that make the 2-year schedule infeasible.
Oregon Wild	Alternatives	Consider alternatives that will allow rivers, floodplains, and ecosystems to function more naturally, including removing revetments in some areas to allow the river to access its historical floodplain and considering targeted land acquisition in the floodplain to facilitate avulsion and river dynamics.
Oregon Wild	Alternatives	Consider alternatives that will plan for changes expected as a result of climate change, such as less snowpack, higher and more frequent bank-full flows, and lower summer stream flows. Consider working with public and private land managers in the Willamette Basin to maintain/ increase carbon storage in forests to help reduce effects of climate change, and reduce land management activities

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		that exacerbate peak flows and low flows, including cumulative landscape coverage of clearcuts, roads, and dense young plantations.
Oregon Wild	Alternatives	Consider alternatives that will expand efforts to conserve native species such as salmonids and river otters, lamprey, mussels, turtles, salamanders, frogs, and macroinvertebrates. There may be beneficial adjustments to system operations or more targeted habitat restoration efforts that would benefit these species.
Oregon Wild	Alternatives	Consider alternatives that will remove weeds from river banks and gravel bars so that native plants can continue to play their role in river ecology.
Oregon Wild	EIS General	Concern separate efforts to allocate stored water in the WVS might limit restoration options under the EIS. Integrate planning efforts to avoid making commitments in the Willamette Basin Review process that would limit options for conservation and restoration under this planning effort.
Erik Burke	EIS General	Rivers are being[s] with rights and it is unethical to enslave and control them with dams. I strongly believe in removing all 13 dams in the Willamette system.
Judith Marshall	Authority	Public meeting poster boards showed navigation as being an authorized purpose, but this is no longer the case according to the draft feasibility study/EA for the WBR. In addition to making this correction, I see USACE is pursing the EIS with all of the authorized project purposes. Will the project need then be to meet these authorized purposes?
Judith Marshall	EIS General	Evaluate operating cost of WVS, including the costs of mitigation for listed fish and the mitigation for the dams vs. fish propagation at the hatcheries to determine if the federal government might be operating a system that is no longer cost effective to achieve flood control.
Judith Marshall	EIS General	Concern that pursuing allocation of reservoir storage/water on the Willamette Basin Review (WBR) will prejudice possible alternatives and decisions of the WVS EIS. Further allocation cannot occur without the WVS operations and maintenance, and therefore it is not justified independently of the WVS program. Additionally, the draft feasibility study/EA for WBR does not address hazardous algae blooms [HAB], which would occur under the authorized use of stream purification. Wouldn't reallocation affect how USACE addresses HAB situations?
Judith Marshall	EIS General	I see nothing on the USACE website about possible decisions from cooperating agencies.
Judith Marshall	EIS General	Share what the safety ratings are for each of the dams and what those ratings mean.
Judith Marshall	EIS General	Disclose where hazardous materials were used in the construction of the WVS and how the public is protected from them.
Judith Marshall	EIS General	What is the EIS baseline, as USACE is modifying it under the Willamette Basin Review?

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Birdshill Community Planning Organization/ Neighborhood Association	EIS General	There has been zero time between the WVSOM EIS project 'project scoping meeting' and termination of the public scoping period.
Birdshill Community Planning Organization/ Neighborhood Association	EIS General	Birdshill [Community Planning Organization/Neighborhood Association] CPO/NA needs an accepted and authoritative source for Willamette River basin terminology. Preferably a source that can be shared among citizens, government entities, densifiers/developers, and taxpayers. Thereby, promoting both common language using accepted terms with images, and common good with understanding of terms and constraints.
Birdshill Community Planning Organization/ Neighborhood Association	EIS General	R04: Develop a routine sequence chart (a 2D chart showing places of performance (who/whom/where) with the traditional steps in a process showing written procedures and regulations) to help expose defects. This both standardizes the process for ongoing operations and maintenance and conveys understanding via a road map of the process.
Birds Hill Community Planning Organization/ Neighborhood Association	EIS General	Coordinate Willamette River Basin management with FEMA.
Birds Hill Community Planning Organization/ Neighborhood Association	EIS General	Government entities along the Willamette River should not encourage or promote expensive and dense population development below Base Flood Elevations (BFEs) in the floodplain.

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Birds Hill Community Planning Organization/ Neighborhood Association	EIS General	Utilize GPS and plus codes for locales and provide multiple maps and map grid systems cross-referenced to multiple policy sources from multiple jurisdictions for proper management of water and mitigation of flood impacts.
Birds Hill Community Planning Organization/ Neighborhood Association	EIS General	Engage document management consultants to address PDF document creation, administration, document archival and retrieval, compiling a thesaurus of terms and visual dictionaries, iconography/symbology, and developing infographics, fact sheets, and document summaries.
Green Belt Land Trust	EIS General	EIS should include discussion of Willamette Restoration Strategy vision and importance of regional collaboration to achieve that vision. Success can only occur with continued regional collaboration. USACE should evaluate how WVS operations can support creating a place where "basin residents can live in healthy watersheds with functioning floodplains and habitats supporting a diversity of native species." It is incumbent on USACE to balance competing interests while maintaining strong collaborative relationships with its partners.
Marion County Board of Commissioners	EIS General	USACE should improve hatchery practices at Minto Fish Hatchery in Marion County.
Marion County Board of Commissioners	EIS General	Consider Marion County economy's estimated $180 million/annual recreational and agricultural irrigation use on water in North Santiam watershed. USACE should take into account the role that recreation from lakes and streams in the North Santiam watershed provides to Marion County. Conduct studies projecting the economic and human impact of changes to management of WVS, including North Santiam watershed.
Marion County Board of Commissioners	EIS General	Marion County may need to seek legal alternatives if needs of local communities are not satisfied in the EIS.
Marion County Board of Commissioners	Environmental Impacts	Lower water levels at Detroit Lake throughout the summer could impact and effectively eliminate recreational use of the lake, which provides approximately 70 percent of jobs in the Detroit Lake area.

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Marion County Board of Commissioners	Environmental Impacts	Radically adjusting water levels will increase the level of turbidity in the North Santiam River downstream of the dams and create operational challenges for water supply systems.
Marion County Board of Commissioners	Environmental Impacts	Lowering seasonal water elevations in Detroit Reservoir and Big Cliff Reservoir could lead to higher temperatures in the North Santiam River. Deviations from normal water quality parameters could impact water treatment plant operations.
Oregon Water Utility Council	EIS General	Approximately 70 percent of the state's population is located in the Willamette Basin, and approximately 85 percent of the population in the Willamette Basin is supported by public water systems. These public water systems provide a safe, reliable water supply for public health, safety, and for business and industrial development activities. The ability of the water providers to meet the projected long-term water supply requirements of our communities is critical to the protection of public health and the economic viability of our state. WVS [WVP] storage is the last remaining water supply available to water suppliers. The stored water in the WVS constitutes the overwhelming majority of the remaining water supply available to public water providers in the Willamette Basin to meet future demands. Some existing water rights for municipal water supply downstream from the WVS reservoirs may become less reliable as a result of the impacts of climate change, reallocation of conservation storage for fish and wildlife benefits, and the subsequent issuance of water rights to protect stored water for instream purposes or as a result of changes in the operation of the Willamette Valley System. Water providers in the Willamette Basin need access to reliable water supply to finance long-term investments in infrastructure to protect public health and support economic growth. Storage space that is disproportionately subject to curtailment, interruptible, or "second-fill" status is unreliable year-to-year and over the long term.
Oregon Water Utility Council	Environmental Impacts	Consider impacts of EIS proposed construction projects on stored water to protect public health, economic impacts of existing and future water supplies for public water providers, and impacts to existing public water systems' water supplies.
Oregon Farm Bureau	Alternatives	During the Willamette Reallocation process, we asked a number of questions about implementation of the Reallocation that the agencies involved in the process have been unable or unwilling to answer. These include basic questions around how the "share the pain" model for the Reallocation would work during times of shortage; how contracts would be administered, particularly between "new" users on the system and the existing agricultural contracts; whether users forced to co[n]vert [sic] from live flow to storage rights would be given a contract preference; how regulation downstream would occur; how the fisheries flows would be administered; and whether the fisheries flows are

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		going to be subject to change as ESA consultations occur. To date, none of these questions have been answered. The answers to these questions have the potential to determine whether and to what extent changes proposed as alternatives in the Willamette Valley System review would impact agriculture in the basin.
Oregon Farm Bureau	Alternatives	Strongly encourage the Corps to keep at the Congressionally authorized purposes of the System and evaluate alternatives that meet fisheries needs while protecting and promoting non-fisheries related uses of the system.
Oregon Farm Bureau	Alternatives	A storage capacity of 1.64 million acre-feet must be maintained during the same period as historical operations and at the same level as historical operations. Maintenance of this storage capacity is particularly important in light of the proposed increased use of the System by a multitude of new users after the completion of the Willamette Reallocation. Agriculture needs both a larger share of the water available in the system and certainty that that amount of water will be available into the future.
Oregon Farm Bureau	Authority	USACE needs to authorize and do channel maintenance in the rivers which are listed as navigable so they are navigable. Channel maintenance would address the serious problem of eroding banks due to gravel and debris that have blocked or partially blocked the main channel.
Oregon Farm Bureau	Environmental Impacts	Oregon produces more than 225 products in the Willamette Valley making up 47 percent of Oregon's total agriculture sales with market value of more than $2.3 billion. The Oregon Farm Bureau has 3,084 members in the Willamette Valley. Members/industries potentially impacted by changes in operations and maintenance of the WVS include the nursery and greenhouse industry, irrigation and water control districts, seed industry, dairy farmers, cattle industry, wheat growers, hazelnut industry, and women in agriculture. We are very concerned about changes to the timing of when the Corps manages the System for flood control storage versus conservation storage. Our membership is both dependent on the winter flood control storage and the spring/summer conservation storage, and the correct balance between the two is critical.
Paul Mikesh	Environmental Impacts	Pike minnow prey on juvenile salmon and steelhead and need to be controlled in the WVS.
Phillip Brozek	Alternatives	Use Forecast Based Reservoir Operations (FIRO) for flood storage management on a programmatic scale resulting in each reoperation study conducting an EA for any impacts beyond those disclosed in the EIS. Use of FIRO would involve conducting review and modification of the Water Control Diagram and possibly the Emergency Spillway Release Diagram for each reservoir.

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Phillip Brozek	Environmental Impacts	Recommend that flows for fish and wildlife and flows for Endangered Species are not strictly linked. Biological Opinion demand will be the priority for fish and wildlife flows, but if in the future Biological Opinion flows are reduced under law or species recovery, fish and wildlife flow will remain at the previous level (current to the time of the EIS).
Phillip Brozek	Environmental Impacts	While there could be some overlap or synergistic effects, ecological flows should not be confused with flows required by the NOAA Fisheries Biological Opinion. The inclusion of these environmental flows in Willamette Valley System operation is not contrary to project authorization as part of the authorized fish and wildlife objective. Ecologically sustainable flow is clearly within the scope and policy in the preparation of EIS alternatives. The EIS analysis should include the healthy inter-relationships of sediment, temperature, nutrient, and connectivity, along with healthy river-based socioeconomic benefits.
Phillip Brozek	Mitigation	Address Toxic Algae Management Plan and include monitoring, communication/notification, and mitigation. Mitigation may include closure of all or part of reservoirs affecting recreation, drinking supply, etc. Future mitigation may include treatment of a reservoir as the technology improves.
Public Power Council	Alternatives	Consider hatchery production program goals and harvest management as part of the EIS in order to understand their impacts and interplay with the resultant Proposed Action.
Public Power Council	EIS General	Corps should use this EIS as an opportunity to reset and influence USACE plans throughout the system (e.g., EA Cougar Dam and Detroit EIS) and to properly sequence the necessary processes and subsequent actions in the WVS.
Public Power Council	EIS General	Work closely with BPA as cooperating agency to produce a thorough analysis of multi-operational effects on power generation. Consider hatchery production program goals and harvest management.
Public Power Council	Mitigation	EIS needs to include a clear effectiveness benchmark to assess if a mitigation action should be implemented. Providing a clear decision matrix and sharing it at all management levels within the Corps, as well as publicly, is necessary for success in the WVS.
Rich Domingue	Alternatives	Consider capping water delivery contracts at current levels and revising project operations to have a high probability of meeting contracts and downstream instream flow needs while minimizing conservation storage.
Rich Domingue	Alternatives	Consider alternatives that include both expedited measures to aid in the survival of the ESA species in the near term as well as longer-term measures for structural and operational changes that will provide longer-term solutions.

Commenter	EIS Subject	Comment Verbatim or Comment Summary
Rich Domingue	Alternatives	Consider creating off-channel storage or rechargeable well-fields using high winter flows to meet summer water demands in the Valley while prioritizing survival and recovery of ESA-listed fish.
Rich Domingue	Alternatives	Evaluate flood damage reduction operations to determine if more moderate operations could provide the same flood and project protection as current operations with less severe impacts on streamflow and fish habitat.
Rich Domingue	Environmental Impact	Analyze each alternative for effects on each independent ESA-population's viability, WVP-wide effects on each affected evolutionary significant unit (ESU) or distinct population segment (DPS), and effects on designated critical habitats for each listed species.
Rich Domingue	Environmental Impact	Concern that the quality and timing of discharges at the dams and the severe reduction or elimination of passage to and from historical spawning and rearing habitats upstream of the dams strongly contribute to both a long-term downward trend and a recent steep decline in the abundances of Upper Willamette River [UWR] Chinook salmon and steelhead.
R. Foster	Alternatives	Can the Corps provide real-time, factual public information of CFS releases, alerting the public of release, volume, and share an estimated time of arrival? It may be good business practice to develop and use an early warning system for property owners, cities, and state agencies (e.g., Oregon Department of Transportation [ODOT]) which have to operate around and within these flooded areas and who will see direct negative impacts from CFS volume releases when there is time to warn all downstream property owners to [sic] they can prepare their animals, homes, and property and ODOT may be able to provide commuters what will occur where and when.
R. Foster	EIS General	Is the old EIS available? Will the new EIS show the changes using Track Change? Will the public meeting presentation and presentation materials be accessed online?
Ryan Thompson	Environmental Impacts	Can USACE share any reports or background information that explain how the WVS [WVP] economic estimates were calculated? If not, then can USACE answer specific questions about how those estimates were calculated?
River Road Water Control Sub-District One	EIS General	Flood management through dam releases has adverse impacts on old and weak revetments.
Stauffer Farms	EIS General	USACE should use the latest up to date technical tools to result in better management of the WVS. Using reliable current data and tools is critical to managing water resources that the basin citizens depend on for their needs.

Commenter	EIS Subject	Comment Verbatim or Comment Summary
Oregon Department of Transportation	Environmental Impacts	USACE should coordinate with Oregon Department of Transportation [ODOT] to avoid adverse impacts on intra- and inter-state highways that are located near WVS dams, flood control devices, reservoirs, and hatcheries from permanent impacts and construction-related temporary impacts from the WVS Proposed Action and selected alternative. If traffic impacts are anticipated, a traffic impact study and cooperative agreements with mitigation may be warranted. Permits could also be required to accommodate oversized vehicles needed during construction. Any proposed action that would result in impacts or changes to ODOT bridges, culverts, or structures on the state highway system should be discussed with ODOT prior to making any decisions.
Doug Heiken	Alternatives	Consider adjusting WVS to conserve/restore freshwater mussels and macroinvertebrates. Lamprey conservation/restoration should be enhanced.
Doug Heiken	Alternatives	Remove revetments wherever possible to allow river dynamics. Remove weeds on banks and gravel barrier islands—manual removal and maybe using high flows.
Kristin Kessler	Alternatives	Consider creative solutions for flood control to make radical changes that will also help endangered species, such as reconstructing floodplain systems to increase flow and help ecological systems (like the Delta Ponds project in Eugene) or using native grasses for flood mitigation.
Kristin Kessler	Authority	Endangered Species should take precedent over other missions in the WVS.
Kristin Kessler	Environmental Impacts	With global biodiversity decreasing, Willamette Valley needs to preserve native species.
Eugene Yacht Club	Alternatives	Extend the usability of Fern Ridge Reservoir to operate in March and October.
John Steele	Alternatives	Stop flow of mercury into Dorena and Cottage Grove Reservoirs by limiting logging in areas of high mercury concentration within the soil substrate.
John Steele	Alternatives	USACE should choose dams farther away from the ocean for mitigation projects—the further upstream, the more opportunities for fish to exploit nearby small streams and slack water areas as habitat, thereby increasing population density and diversity.
John Steele	Alternatives	Correct water temperature outflow from all dams starting with the most upstream locations.
John Steele	Alternatives	USACE should coordinate with NOAA to track salmon migrating to the ocean to gather information about their habitat and food sources (what, where, when, and why). What are food sources of salmon while in the ocean? Concerned about supply of herring.

Commenter	EIS Subject	Comment Verbatim or Comment Summary
John Steele	Alternatives	Create a property acquisition endowment for USACE to purchase streamside property from timber companies, land owners, municipalities, etc. (specifically on the headwaters of major tributaries in the Willamette River Basin [WV basin]) by placing a 1 percent surcharge on habitat enhancements.
John Steele	EIS General	USACE should fund educational science field trips at local schools, talk with school programs that have demonstrated success with improving fish habitat, and provide schools with aquariums to raise and release fish in local streams.
John Steele	EIS General	USACE has a credibility issue concerning meeting environmental standards for fish passage. How could Dorena hydroelectric project be built ($24 million hydroelectric plant) without any fish passage improvements? Initially it was described as $9.3 million project and it ended up being $24 million without any fish passage. Builders complained that they could not afford the cost of adding fish passage, but they had not legally acquired any contractual agreement with any profit or non-profit electrical company to purchase the produced power. So they ended up spending $870,000 to bury a 6.5-mile underground power line to sell power to Pacific Power. USACE agreed to enter into a working agreement with builder/owner during construction to work out conflict through negotiations—did the owner/builder abuse this agreement or was the relationship with owner/builder more important than the working agreement with the people who live and work around Dorena Reservoir?
John Steele	Environmental Impacts	Coordinate with Oregon Department of Fish and Wildlife [ODFW] to track nutrient flows into reservoirs using radioactive isotope tagging of fertilizer used by timber companies.
John Steele	Environmental Impacts	Optimal temperatures at dam outflows would have a domino effect on downstream dams because nearby streams would not be overshadowed by incorrect temperature regimes, thus preventing fish from not entering when temperatures are not within a specific range.
John Steele	Mitigation	USACE should pay landowners to improve riparian habitat. For example—offer seminars on proper land management for fish habitat, pay for their attendance, offer financial incentives for efforts that enhance riparian habitat like tree planting. This could be monitored by drones and/or satellite mapping. Before and after pictures could be used to quantify and verify habitat improvements. Offer recognition awards to landowners that go the extra mile. This would probably cost less than $150,000 and would be well worth it.
Network of Oregon Watershed Councils	EIS General	USACE should work to limit upstream inputs that lead to toxic algae blooms in reservoirs, sediment overloads, and high water temperatures. Scoping document should include ways to monitor and treat water quality issues. Downstream issues mostly concern fish habitat—water quality and quantity can

Commenter	EIS Subject	Comment Verbatim or Comment Summary
		be impacted by how dams are managed and operated. Water temperature and sediment loads can also be impacted by the USACE management plan.
Network of Oregon Watershed Councils	EIS General	Dams in the WVS are artificial but necessary barriers to natural watershed system health. USACE should work with local councils on issues that impact water quality, water quantity, and fish and wildlife habitat upstream and downstream of WVS dams. There is a balance between USACE mission of flood control and Watershed Council's mission of protecting and restoring watershed health. In developing scoping and the EIS, USACE should work with the Willamette Watershed Councils as partners for input on the ongoing management of the dams.
Native Fish Society, et al.	Alternatives	Drawdown analysis should include consideration of methods that address the diversity of life histories of juvenile emigration throughout the project reservoirs and dam structures and their corresponding biological needs. Consider drawdowns on more reservoirs to flush native, juvenile fish downstream rather than turbines.
Native Fish Society, et al.	Alternatives	USACE should remodel Operations and Maintenance Team Report and Configurations/Operations Plan alternatives and not be constrained by previous assumptions that USACE must maximize or fulfill authorized purposes except for flood control and the maintenance of human health and safety.
Native Fish Society, et al.	Alternatives	USACE has several projects under NEPA and ESA consideration, including Willamette Basin Review, Detroit Dam and Lake Downstream Passage Project, Cougar Dam and Reservoir Downstream Fish Passage Project. No Records of Decision [ROD's] [sic] have been completed, nor have any of the projects and associated operations commenced.…These projects should be incorporated as proposed alternatives, not as No-action alternatives. None of these projects are currently operational and it is incorrect to consider them otherwise for the purposes of evaluation under NEPA. Further, most, if not all, of these actions are not scheduled to be operational until after the completion of the system's EIS and corresponding Biological Opinion. USACE has a duty to adhere to the requirements of NEPA in completing the WVS analysis. Further, a properly executed analysis fulfills the Congressional intent and purpose of NEPA to provide the agencies and the public with the most complete understanding of the impacts of a proposed federal action.
Native Fish Society, et al.	Alternatives	USACE should analyze current and future costs of power production on the Willamette, as compared to other BPA project systems, along with evaluation of expected changes in electrical production and distribution in the region that could impact future power demand and generation. The EIS should include considerations of BPA's precarious financial state when determining what funding will be available for future mitigation and restoration projects and whether BPA will continue operating the turbines in the long term.

Commenter	EIS Subject	Comment Verbatim or Comment Summary
Native Fish Society, et al.	Alternatives	Any hydropower infrastructure should be maintained on explicit schedules designed to result in the least interference to fish passage, water quality, water flows, and other recovery objectives.
Native Fish Society, et al.	Alternatives	NOAA identified critical actions in the 2008 Biological Opinion that USACE and action agencies must take to protect ESA-listed species and ensure recovery: 1) fish passage for adults and juveniles, 2) improved water temperatures and flows downstream of dams, 3) downstream habitat restoration, and 4) completed Hatchery Genetic Management Plan.
Native Fish Society, et al.	Alternatives	Action agencies should utilize WVS analysis and ESA consultation as an opportunity to craft and execute roadmap to recovery for the Willamette Basin. Agencies should use best available science to evaluate the multitude of operational and infrastructural adjustments that could be made to improve the root causes of wild fish decline and loss of ecosystem function in the basin.
Native Fish Society, et al.	Alternatives	Proposed Action alternatives should be designed and evaluated with flexibility in mind, and alternative measures should include robust timelines, metrics, and methods for evaluation.
Native Fish Society, et al.	Alternatives	Concern about the complexity of juvenile collection facilities, like those currently proposed for Cougar and Detroit Dams, because they have to be designed for a wide range of reservoir surface water elevations and fluctuations in flows, which makes these systems more difficult to engineer and install and increases the likelihood of failure.
Native Fish Society, et al.	Alternatives	Consider the following alternatives—drawdown analysis incorporating diversity of life histories/biological needs, lowering reservoir pool elevations to allow surface-oriented fish to access passage outlets, and run-of-the-river operations—to extend the period for which the projects provide potential storage for flood control, which is crucial as climate change makes severe weather and flooding more unpredictable; however, the need to store water for flow augmentation and other uses during the summer and fall need to be taken into account.
Native Fish Society, et al.	Alternatives	Evaluate infrastructural and operational alternatives for improving the timing of adult migration, reducing prespawn mortality, and increasing the number of adults that are successfully transported into habitats above WVS projects, including temperature control operations and adult collection facilities operations. Consider specific temperature control operational changes specific to each dam site at the following dams: Cougar, Detroit, Hills Creek, Lookout Point, and Green Peter.
Native Fish Society, et al.	Alternatives	Evaluate upgrading adult collection, handling, and transport in the Middle Fork adult collection facility.
Native Fish Society, et al.	Alternatives	Evaluate measures to improve flows for the recovery and benefit of fish and wildlife and ensure flow targets are met, even in years of water shortage.

Commenter	EIS Subject	Comment Verbatim or Comment Summary
Native Fish Society, et al.	Alternatives	EIS should include an alternative that would reconfigure pre- and post-flood damage reduction operation. In particular, the alternative should describe measures necessary to revise project operating manuals to take greater advantage of forecasting services to minimize rates of attenuating and augmenting while maintaining the current control point flow objectives.
Native Fish Society, et al.	Alternatives	Evaluate methods to improve downstream rearing habitat to increase habitat suitability and diversity.
Native Fish Society, et al.	Alternatives	Monitor and evaluate the rates of hatchery fish spawning in the wild and have procedures in place to reduce straying if rates of percent hatchery origin spawners are exceeded. Ensure that hatchery programs adhere to Hatchery Genetic Management Plans to protect wild, ESA-listed fish from hatchery fish.
Native Fish Society, et al.	Alternatives	Consider the following actions to support the recovery of ESA-listed fish in areas outside the four priority basins: 1) Conduct a basin-wide assessment to identify anchor habitats in non-priority basins and opportunities to correct smaller passage barriers to provide fish access to those reaches; 2) fund and implement habitat restoration and improvement in undammed tributaries like the Molalla, Tualatin, Luckiamute, Calapooia, Pudding, Yamhill, Marys, and Coast Fork Willamette; 3) consider special guidance for regulatory programs operated by the Corps and other action agencies, including removal-fill permitting, to mitigate for impacts of the dams on listed fish.
Native Fish Society, et al.	Alternatives	Consider how addressing deferred maintenance may assist with fish recovery efforts, including addressing “red tag” or in operational ROs and other outlets.
Native Fish Society, et al.	Alternatives	EIS should include ongoing Willamette Basin Review and proposed storage water reallocation as a proposed alternative, not as an ongoing or no-action alternative.
Native Fish Society, et al.	Alternatives	Water quality in the downstream reaches is impacted by current project operations. Water temperature and dissolved gas levels are particularly problematic for ESA-listed fish at numerous life stages including egg incubation, emergence, rearing, and adult returns. The following alternatives to improve water quality should be evaluated and include: 1) Reduce water temperatures below Lookout Point and Detroit dams in fall and winter by using the lowest ROs to discharge colder water during drawdown operations. 2) Improve water temperatures downstream of WVS projects in spring to improve adult migration to fish collection facilities. 3) Reduce total dissolved gas at projects where it exceeds NOAA Fisheries Criteria. Evaluate the use of a “flip lip” at Big Cliff Dam.

Commenter	EIS Subject	Comment Verbatim or Comment Summary
		4) Adopt and strictly follow maintenance schedules and emergency protocols provided by NMFS and ODFW to reduce water quality impacts during such events.
Native Fish Society, et al.	Authority	USACE has the legal authority and management discretion to manage the WVS for the benefit of threatened fish where doing so does not impair flood control or the maintenance of human health and safety.
Native Fish Society, et al.	EIS General	Action agencies should view the EIS as a meaningful opportunity to co-create with the public a future for the Willamette Basin that includes abundant wild fish, healthy rivers, and thriving local communities.
Native Fish Society, et al.	EIS General	Expand Purpose and Need of EIS to include recovery of ESA-listed fish.
Native Fish Society, et al.	Environmental Impacts	Climate change is expected to have significant impacts on the water resources available in the Willamette basin, including changes in the type and timing of precipitation and increased water temperatures. Given these expected changes, providing access to high-quality, high-elevation habitats for aquatic species and ESA-listed fish is increasingly important. EIS impacts analysis should consider climate change scenarios utilizing most recent available science, assessing impacts of alternatives within the frame of anticipated climate change over the duration of the next WVS operations plan and Biological Opinion. Evaluation should include climate change projection scenarios across the range of foreseeable possibilities from best case to worst case, including expected outcomes if current trends continue.
Native Fish Society, et al.	Environmental Impacts	EIS should assess how the reservoirs contribute to climate change through the production of greenhouse gases.
Native Fish Society, et al.	Environmental Impacts	Use qualified experts and engage relevant tribal nations to document, protect, or recover cultural resources. Evaluate how the action agencies will fulfill any outstanding requirements relating to the National Historic Preservation Act and assess the effects of proposed operations on properties on or eligible for inclusion on the National Register of Historic Places.
Native Fish Society, et al.	Environmental Impacts	Determine the full range of indirect, interrelated, and cumulative actions stemming from the operation and maintenance of all components of the WVS, including hatcheries, irrigation contracts, water delivery, etc.
Native Fish Society, et al.	Environmental Impacts	EIS should consider how reservoirs and dam operations contribute to illegal poaching of ESA-listed fish.

Commenter	EIS Subject	Comment Verbatim or Comment Summary
Native Fish Society, et al.	Environmental Impacts	Consider how future flood control needs will be impacted by the 2016 NMFS biological opinion regarding FEMA's Oregon flood insurance program.
Confederated Tribes and Bands of the Yakama Nation	EIS General	Promises guaranteed under 1855 Treaty with the Yakamas (12 Stat. 951) include reserved rights within the Willamette Valley. Yakama Nation is concerned that proposals developed through any EIS may interfere with Yakama Nation's Treaty reserved rights falling within Yakama Nation's usual and accustomed areas. Due to the importance of the activities being evaluated, Yakama Nation requests meaningful technical level engagement with USACE during the NEPA process and development of the EIS.
Jean Public	EIS General	USACE is anti-environmental, I would prefer no-action, this work is not needed.
Yamhill Soil and Water Conservation District	EIS General	Floods in 1996, 1997, 1998, and April 2019 have caused significant river scouring, loss of bank protection, and massive amounts of debris logged in this area. Access road to farmland and adjacent areas are in jeopardy of being lost in the next flood. It is evident that future river flood events will create a new channel, possibly a main channel across the May's land on Lambert Road. When this occurs, the river will endanger the downstream mining pits and area resulting in river capture and head cutting upstream. Approval of mining operations in the Willamette Valley floodplains of Yamhill County weakens the structure integrity of the floodplains, resulting in head cutting and eventual river capture destroying productive, high value farmland that Yamhill County depends on to support its economy.
Junction City Water Control District	Environmental Impacts	Many agricultural lands within Junction City Water Control District [JCWCD] maintain individual groundwater wells that are directly affected by river levels and stream flows. Any changes to WVS must take into account subsequent effects on agricultural wells that are located along the entire length of the system.
Diana Olsen	EIS General	Need look at impact of raw sewage and other pollutants in our rivers that has caused the decline of fish.
Private Citizen	Alternatives	USACE should look for opportunities to increase the frequency and duration of inundation of floodplains and side channels to provide refugia and foraging habitat for native fish, including ESA-listed species.
Private Citizen	EIS General	Concern about floodplain conceptual full plan. Useful to include visual dictionary, terminology, thesaurus on terms, context in which terms exist, and describe location in basin to neighborhood.
Private Citizen	Environmental Impacts	Concern with streamside growth of vegetation along the Salt Creak [Creek] [sic] (Yamhill) instream dams with flooding in winter and dry in summer.

Commenter	EIS Subject	Comment Verbatim or Comment Summary
Troy Brandt	Alternatives	Establish a funding program to support habitat conservation, land trust support for purchasing conservation properties, and replacing river training infrastructure that limits river-floodplain connectivity. River corridor should be prioritized for purchase, as habitat will continue to be converted for agriculture and residential, commercial, and municipal development. Existing developed properties in key locations could be restored to enhance habitat and reduce flood risk to other properties.
Troy Brandt	Alternatives	Manage winter/early spring releases to increase river-floodplain connectivity.
Troy Brandt	Alternatives	Develop a cost share program to repair and replace stone revetments on the Willamette River and tributaries. As revetments age and fail, landowners are likely to rebuild revetments with stone. Repairs offer an opportunity to enhance river channel, bank, and upland habitats with bioengineering. Providing a cost share program would improve habitat conditions and river corridor functions. The program could also support revetment modifications to increase river-floodplain connectivity. Examples include removing/replacing undersized drainage culverts, removing relict revetments, and reconnecting blocked side channels and other floodplain habitats.
Middle Fork Willamette Watershed Council	Alternatives	Flows in the Middle Fork Willamette are severely depleted from historical conditions in order to meet congressionally approved rule curves. The rule curve scenarios are dated and pose not only a risk to aquatic ecosystem health and recover[y] [sic], but also may pose a risk to human populations. The effects of climate change and future precipitation scenarios should be considered for flood risk mitigation as well as effects on fish species life stages and the creation and maintenance of dynamic aquatic habitats.
Middle Fork Willamette Watershed Council	Alternatives	Existing revetments/levees in the Middle Fork Willamette prevent access to, and function of, floodplain habitats. Additionally, we suggest a streamlined 408 process. In some cases, decommissioning levees could result in a positive benefit for both endangered species through habitat creation and downstream communities through flood-risk mitigation.
Nathan Warren	Alternatives	Consider developing a whitewater feature either along the Willamette River in the Eugene/Springfield area, or along the canoe channel that runs through Alton Baker Park.
Willamette Kayak and Canoe Club	Environmental Impacts	Man-made debris upstream of the current I-5 freeway bridge over the Willamette creates a navigation and recreational hazard for river uses [which] [sic] are a popular section of the river in the Eugene/Springfield area. It is also an ecological disruption interrupting the natural flow of the river. Cost of remediation and mitigation would be inexpensive since it involves removal rather than installations of man-made materials. This hazard is blatant, dangerous, and conspicuous in regard to current management practices.

Commenter	EIS Subject	Comment Verbatim or Comment Summary
Clinton Begley	Alternatives	Consider the addition of recreation amenities for whitewater paddlers that would include the construction of additional features in the Long Tom channel that would accommodate use at a wider range of flows.
John Zielinski	EIS General	Will the TMDL be part of the EIS? Agricultural land has increased flooding, which could mean increased mercury deposits. With a changing climate, the need for water is increasing. Water allocation for agriculture should be higher. Bank erosion is also an issue for farmers with property bordering the Willamette River.
Steve Caldwell	Alternatives	USACE allows too much water during the winter and spring months to spill out of the dam. If the water is cold, algae is less active, if there is a full reservoir the dilution of an algae bloom is greater. The rules that require the Corps to dump water need to be changed to support human health, fiscal responsibility, and store more water behind the Detroit Dam. The proposed project costs too much money and will in the end result in more damage to the regional environment.
Eugene Water and Electric Board	EIS General	Project-induced reductions in river level below both the Leaburg Dam and Walterville Diversion are limited to 2 inches per hour year-round. As such, operations and maintenance of WVS directly affects Eugene Water and Electric Board's [EWEB's] downstream project. EWEB's Hayden Bridge Filtration Plant is located downstream of Cougar and Blue River projects. Operations and maintenance of these projects has the potential to affect downstream water quality. For example, reservoir management can influence cyanobacteria blooms and reservoir drawdowns can result in increased turbidity in the McKenzie River downstream of the projects.
Eugene Water and Electric Board	EIS General	Improving coordination and communication by USACE with stakeholders regarding fish enhancement projects/operational changes could help identify opportunities for stakeholders to work more collaboratively on identifying and implementing solutions.
County Heritage Farms	Alternatives	It would be an advantage if the rule curve law was amended to allow reliable use of local real-time data to assist USACE to fine tune management decisions regarding storage and downstream releases. This would help in situations where flows and flow conditions do not match long-term averages. Having management flexibility will be important in the future with climate change causing fluctuations in weather patterns.

- Most comment entries are presented as received by USACE with minor modifications for clarity and document consistency where needed (e.g., denoted with [sic], acronyms converted to words, capitalization adjustments, etc.). Use of "projects" can refer to the WVS dams and reservoirs (e.g., Cougar and Blue River projects). "Corps" refers to USACE.

4 Introduction – Supplemental EIS

This report documents USACE's public scoping process for the Willamette Valley System (WVS) Operations and Maintenance Supplemental Environmental Impact Statement (SEIS). The SEIS is being developed in accordance with the National Environmental Policy Act (NEPA), which requires all federal agencies to analyze potential environmental, social, and economic impacts of their proposed actions as well as to identify and consider reasonable alternatives to those actions. Public scoping is required under NEPA and is one of the earliest phases in the development of an SEIS.

This report details the public engagement tools and methods used by USACE during the public scoping period and the data and analysis of the public comments that were received. The intent of this report is to provide the public with information about the scoping process and issues that were raised by stakeholders during the public scoping period. USACE will also use the public comment summary in this report to inform the NEPA process to help refine the alternatives considered and focus the issues for analysis.

4.1 What is USACE proposing to do?

On April 11, 2025 the U.S. Army Corps of Engineers Portland District (USACE) published the notice of availability for its final environmental impact statement (FEIS) for the Willamette Valley System Operations and Maintenance. However on May 15, 2025 USACE published a notice of intent to prepare this Supplemental Environmental Impact Statement (SEIS) to address Congressional direction in Section 1326 of WRDA 2024. Congress directed the Secretary of the Army to formally analyze an alternative that ceases federal hydropower operations at the Willamette Valley System (WVS) before completing its overall review of the system. USACE determined the most appropriate way to address this directive is to supplement its analysis in the FEIS by adding an additional alternative while also updating the proposed interim operations to reflect what has been learned during adaptive management as well as actions not previously analyzed from the 2024 NMFS Biological Opinion.

Specifically, USACE is supplementing the FEIS to include Alternative 6 that will analyze ceasing federal hydropower operations at the WVS system projects. Also included are revisions to the interim operations: an interim fall deep drawdown for fish passage at Detroit Dam; an adjustment to the timing of the Lookout Point spring spill, and minimum flow targets. Given that this SEIS is a supplement to the FEIS; together, they comprise the full range of alternatives and their evaluations for the operation and maintenance of the WVS and should be read together.

4.2 What is public scoping?

Public scoping is an early step in the NEPA SEIS process when the public is invited to provide information and identify issues and potentially significant effects to be considered in the SEIS.

The purpose of the public scoping process for the WVS SEIS was to provide information to the public, narrow the scope of analysis to significant environmental issues, serve as a mechanism to solicit agency and public input on alternatives and issues of concern, and ensure full and open participation.

The input that USACE received from the public during the scoping period will inform the analysis of potential effects, alternatives development, and the criteria for evaluation and comparison of alternatives.

5 Public Scoping Process for the Willamette Valley System Operations SEIS Development

5.1 Notice of Intent

The Notice of Intent was for the preparation of a Supplemental Environmental Impact Statement to address the to address the directive in the 2024 Water Resources Development Act (WRDA) to formally analyze an alternative that would cease hydropower operations at USACE owned and operated Willamette Valley Projects. The Notice of Intent was published in the Federal Register on May 16, 2025 and is considered the start of the public scoping comment period. The public scoping period ended on June 21, 2025. The link for the Notice of Intent can be found here: https://www.federalregister.gov/documents/2025/05/16/2025-08689/notice-of-intent-to-prepare-a-supplemental-environmental-impact-statement-for-the-operation-and.

5.2 Outreach

USACE did outreach for the SEIS by publishing press releases (https://www.nwp.usace.army.mil/Media/News-Releases/) and sharing email notifications and updates through the project distribution list to various stakeholders. The project distribution list is a database developed for this project that includes contact information for interested stakeholders from previous projects and people who requested to receive project updates. USACE will update the distribution list throughout the SEIS process, and anyone can join. If you are interested in receiving official project updates from USACE, please send a request to the project email address: willamette.eis@usace.army.mil.

Table 5-1. SEIS Outreach Tools.

Date	Tool	Description
5/16/25	News release	"Corps opens public comment period for ending hydropower production, deeper Detroit reservoir drawdowns" https://www.nwp.usace.army.mil/Media/News-Releases/Article/4189008/corps-opens-public-comment-period-for-ending-hydropower-production-deeper-detro/
5/16/25	Email notification via distribution list	Notice of Intent, pdf of News Release
May 25	Flyers	Posted at various USACE project sites

Date	Tool	Description
6/4/25	News release	"Corps extends public comment period for ending hydropower production, deeper Detroit Reservoir drawdowns" https://www.nwp.usace.army.mil/Media/News-Releases/Article/4206644/corps-extends-public-comment-period-for-ending-hydropower-production-deeper-det/
6/5/25	Email notification via distribution list	Notice extending the public comment period

5.3 Cooperating Agencies

USACE included the same tribes, federal, and state agencies that were cooperating agencies for the WVS EIS. The following tribes and federal and state agencies are participating as cooperating agencies for the SEIS: National Marine Fisheries Service, U.S. Fish and Wildlife Service, Bonneville Power Administration, Bureau of Reclamation, U.S. Environmental Protection Agency, The Confederated Tribes of the Grand Ronde Community of Oregon, Oregon Department of Agriculture, Oregon Department of Environmental Quality, Oregon Department of Fish and Wildlife, and Oregon Water Resources Department.

5.4 Public Scoping Meetings

As part of the public scoping process, USACE scheduled and facilitated two in-person public scoping meetings on May 31, 2025 in Detroit, Oregon and June 3, 2025 in Salem, Oregon to engage with and inform the public on the development of the SEIS and solicit input and public comments. Virtual public scoping meetings were held on May 28 and 29, 2025.

Table 5-2. Dates and locations of public meetings.

Date	Location
May 28, 2025	Virtual Public Meeting
May 29, 2025	Virtual Public Meeting
May 31, 2025	Detroit City Hall (Detroit, OR)
June 3, 2025	Broadway Commons (Salem, OR)

5.5 Public Scoping Meeting Advertisement

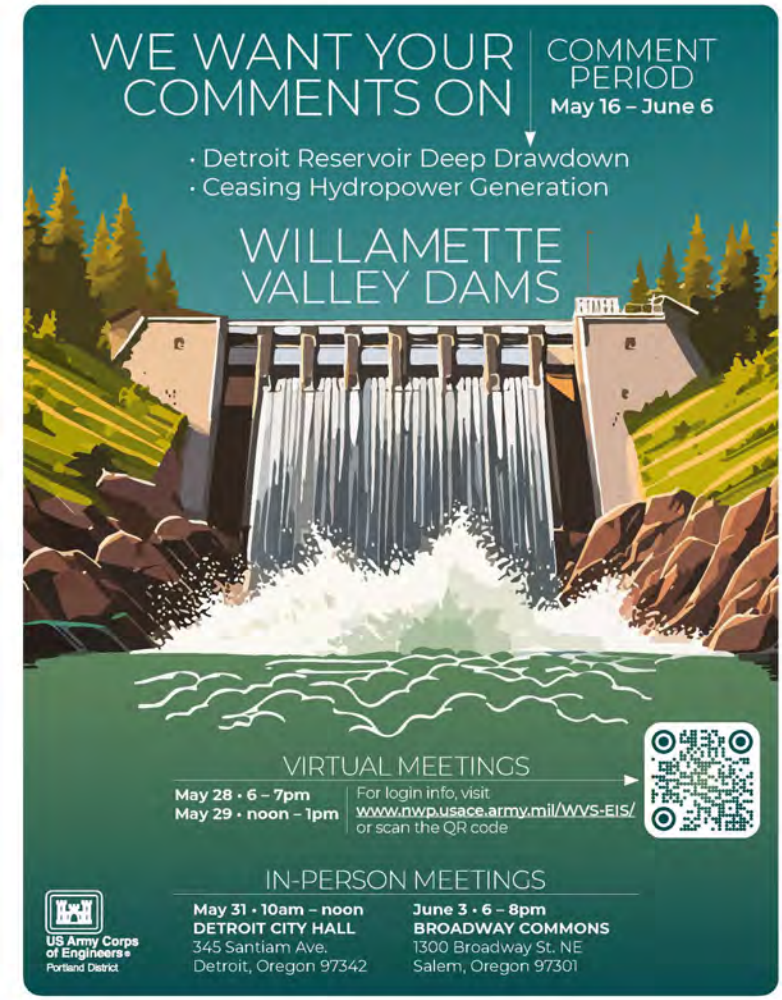


Figure 5-1 WVS SEIS Public Scoping Meeting Advertisement

5.6 Social Media

USACE used their existing Facebook, X, YouTube and Instagram social media accounts to advertise the public scoping meetings.

Figure 5-2. WVS SEIS Public Comment Period Facebook Post Insights Overview

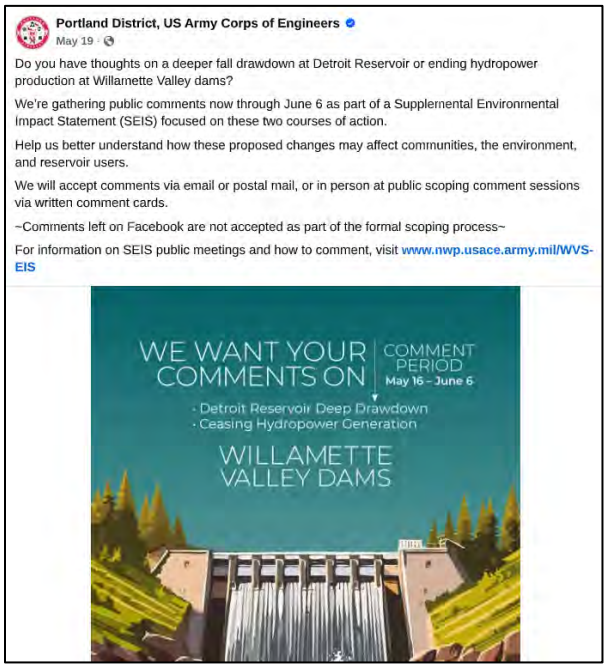


Figure 5-3. WVS SEIS Facebook Comment Period Post

USACE Portland District Public Affairs Office produced a video on the Willamette Valley System of Dams Supplemental Environmental Impact Statement (SEIS). The video is still available here: https://www.youtube.com/watch?v=HtGfTf6xd8A

Table 5-3. Social media posts.

Date	Platform
May 19, 2025	Facebook and Instagram (14,051 views, 5,488 accounts reached, and 289 reactions)
June 5, 2025	Facebook and Instagram (7 likes and 1 share; this was a reshare of the May 19, 2025 and was not boosted)

5.7 Meeting Schedule/Format

Meeting start times alternated between midday and evening times to accommodate work schedules from members of the public who would likely attend either on behalf of their organization during the work-day, or for those who preferred to attend after the work day. The in-person Detroit, Oregon meeting was held on the weekend to accommodate work schedules from members of the public that may not have been able to drive to Salem, Oregon for the evening in-person meeting.

USACE used a hybrid meeting format that included both a presentation and one-on-one time with USACE experts. This proved to be beneficial to the public because it provided the opportunity to learn more about the project during the presentation and to talk to USACE staff about any remaining questions or individual concerns one on one.

6 SEIS Public Scoping Comment Summary

Public scoping comments were compiled and added to a Microsoft Excel database for organization, summary, and analysis. USACE received a total of 246 comments. These comments were in 117 unique correspondence documents (e.g., email, comment brochure, etc.). Because correspondence documents often contained multiple comments on different topics, each document was reviewed for specific comments and organized accordingly. Scoping comments were provided to the USACE subject matter experts to inform the scope of the analysis, alternative development, and impacts to resources in the Draft SEIS.

6.1 Comment Collection Methods Used

USACE accepted public comments via mail (U.S. Army Corps of Engineers, CENWP-PME-E, ATTN: Garrett Dorsey, P.O. Box 2946, Portland, OR 97208-2946), project email (willamette.eis@usace.army.mil) and public comment brochures distributed and collected at meetings. Comments posted on social media are not considered official public comments and are not included in this report; USACE clearly indicates in social media postings that comments on social media posts are not considered official public comment and social media posts direct users to the project website to learn how to submit official public comments.

6.2 Public Scoping Comment Analysis Process

All public comments received were treated equally with respect to their summary, analysis, and consideration regardless of the affiliation of the commenter, correspondence type, comment content, comment topic, or length of correspondence.

The comment analysis process began with organizing correspondence received during the public scoping period and assigning them with document IDs. All correspondence documents were read in their entirety and then broken down into separate comments by individual topic/concern and assigned a comment ID number. Comments were then added to the comment database where they were summarized and assigned one topic.

6.3 Public Scoping Comment Submission Received (Number of Correspondences)

The majority of comment documents were received via email. Comment documents were also received at the public scoping meetings. A small number of comments were delivered by hand or sent by mail.

USACE anticipated a variety of stakeholder types to submit public comment documents because of the large scope of the project. As Figure 6-1 shows, the majority of comment documents came from unaffiliated individuals (87 correspondences), followed by federal agencies (5 correspondences), state agencies (5), NGOs (4 correspondences), and city governments (4 correspondences). The remaining comment documents were submitted on behalf of other organizations in small numbers (less than 4 correspondences) from various stakeholder groups, including comment documents representing tribal interests, agricultural groups, utility boards, or county governments.

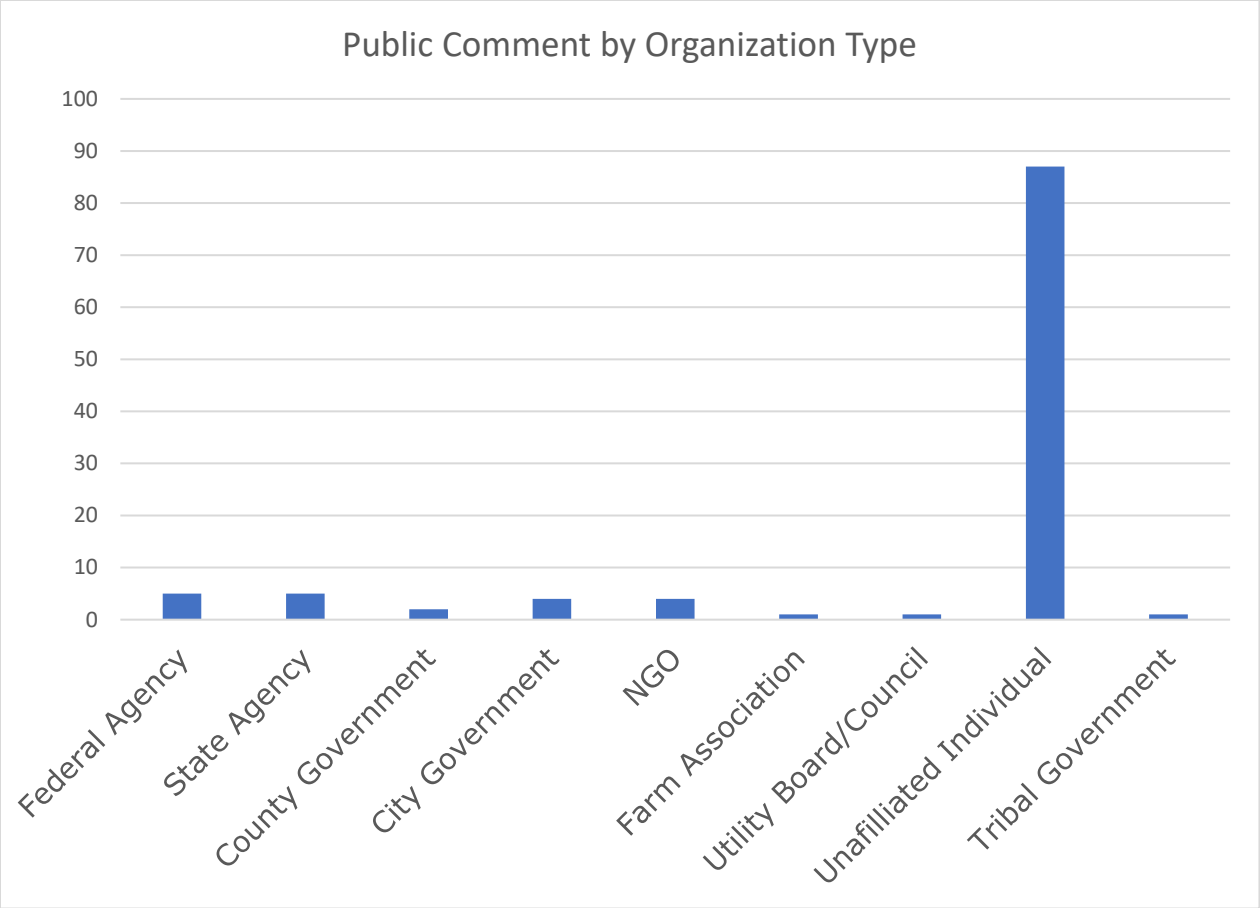


Figure 6-1. Public comment on SEIS by organization type.

The following topics were identified in reviewing public comments: Alternatives (such as new suggested alternatives or factors to consider when developing alternatives), hydropower (such as impacts due to deauthorization of hydropower), deep drawdown (such as impacts of a deep drawdown at Detroit Dam and impacts to downstream communities), NEPA process (such as suggestions for alternatives analysis and SEIS development), and environmental impacts (such as comments relating to how a resource is impacted by operations and maintenance).

These topics emerged as themes throughout the 246 comments received (Table 6-1). Most comments pertained to environmental impacts to the project. The next most commented on topics were deep drawdown (65 comments) and alternatives (45 comments).

Table 6-1. Comments received by topic.

Topic	Number of Comments Received
Hydropower	29
Deep drawdown	133
NEPA process	62
Environmental impacts	17

6.3.1 Hydropower

USACE received twenty-nine (29) comments regarding hydropower. Overall, commenters were concerned with operation impacts, removal of infrastructure, economic impacts, grid reliability, and energy production. Comments requesting a dam-by-dam analysis regarding deauthorization of hydropower, a step-wise approach for conducting the deep drawdown, analysis for partial hydropower deauthorization, and suggestions for operational alternatives that do not relay on power intakes were received.

6.3.2 Deep Drawdown

USACE received one hundred thirty-three (133) comments regarding the deep drawdown at Detroit Dam. Comments on this subtopic included concern on impacts of a deep drawdown on water quality downstream, impacts to municipal water supplies, impacts to recreation, economic impacts, and negative impacts to kokanee within Detroit Reservoir. Some comments referenced the deep drawdown at Green Peter Dam as an indicator of potential issues with a deep drawdown at Detroit Dam. Comments were submitted both advocating for and against the deep drawdown at Detroit Dam. The majority advocated for USACE to not conduct the deep drawdown at Detroit Dam due to the impacts.

6.3.3 NEPA Process

Sixty-two (62) comments pertained to the NEPA Process. These comments focused on the SEIS process, schedule for completion of the SEIS, concerns on process and legal compliance, engagement of stakeholders, alternative development, and requests for scoping comment time extensions. Comments were received concerning the hydropower deauthorization alternative, using a dam-by-dam analysis, developing fish passage alternatives, alternative deep drawdown operations, general alternative management approaches, and alternative solutions to salmon recovery. Comments regarding the alternative management approaches focused on approaches to provide flexibility to operations such as forecast informed reservoir operations (FIRO), modification of rule curves, alternative reservoir refill management, and broader coordination approaches between watersheds. Comments received related to salmon recovery include increasing hatchery programs and increase in predator control.

6.3.4 Environmental Impacts

Seventeen (17) pertaining to environmental impacts associated with the WVS SEIS. Comments received included water quality concerns regarding turbidity, sediment transportation related to the Detroit deep drawdown, impacts on fish species (in particular kokanee), effects to fish and wildlife and their associated habitat, total maximum daily load compliance, climate change considerations, ecosystem functions, harmful algal blooms, and downstream habitat restoration opportunities. Comments regarding kokanee were focused on the impacts of the deep drawdown at Green Peter Dam and the potential similar impact to kokanee at Detroit Dam. Commenters from municipalities downstream of Detroit Dam commented on the impacts to water quality, increases in turbidity, and increase in sediment and the associated impacts to drinking water.

6.4 Scoping Comments

All comment emails and documents received are below. Emails and documents were formatted to fit within this public scoping report. Content of emails and documents has not been altered, and all content is verbatim.

US Army Corps of Engineers®
Portland District

Willamette Valley System Operations and Maintenance Environmental Impact Statement

Public Scoping Report

Attachments

Attachment A: Notice of Intent

U.S.C., Appendix, as amended), the Government in the Sunshine Act of 1976 (5 U.S.C. 552b, as amended), and 41 CFR 102–3.140 and 102–3.150.

Purpose of the Meeting: The mission of the DIB is to examine and provide the Secretary of Defense and the Deputy Secretary of Defense independent advice and recommendations on innovative means to address future challenges in terms of integrated change to organizational structure and processes, business and functional concepts, and technology applications. The DIB focuses on (a) technology and capabilities, (b) practices and operations, and (c) people and culture.

Agenda: During the meeting, the DIB will deliberate and vote on the unclassified portion of the 5G Study. See below for additional information on how to sign up to provide public comments. Oral comments will be accepted at the public meeting if time permits.

Meeting Accessibility: Pursuant to Federal statutes and regulations (the FACA, the Sunshine Act, and 41 CFR 102–3.140 through 102–3.165), the meeting is open to the public via webcast and conference call from 3:00 p.m. to 4:00 p.m. EDT. Members who plan to attend via webcast or phone should register on the DIB website, *http://innovation.defense.gov,* no later than April 1, 2019.

Special Accommodations: Individuals requiring special accommodations to access the public meeting should contact the Designated Federal Officer (DFO), see **FOR FURTHER INFORMATION CONTACT** section for contact information, no later than March 25, 2019, so that appropriate arrangements can be made.

Written Statements: Pursuant to section 10(a)(3) of the FACA and 41 CFR 102–3.140, the public or interested organizations may submit written comments to the DIB about its approved agenda pertaining to this meeting or at any time regarding the DIB's mission. Individuals submitting a written statement must submit their statement to the DFO (see **FOR FURTHER INFORMATION CONTACT** section for contact information). Written comments that do not pertain to a scheduled meeting may be submitted at any time. However, if individual comments pertain to a specific topic being discussed at the planned meeting, then such comments must be received in writing not later than April 1, 2019. The DFO will compile all written submissions and provide them to DIB members for consideration.

Oral Presentations: Individuals wishing to make an oral statement to the DIB at the public meeting may be permitted to speak for up to two minutes, time permitting, and will need microphone access enabled on the device from which they are participating in the meeting. Anyone wishing to speak to the DIB should submit a request by email at *osd.innovation@mail.mil* not later than April 1, 2019 for planning. Requests for oral comments should include a copy or summary of planned remarks for archival purposes. Individuals may also be permitted to submit a comment request at the public meeting; however, depending on the number of individuals requesting to speak, the schedule may limit participation. Webcast attendees will be provided instructions with the live stream link if they wish to submit comments during the open meeting. Dial-in attendees must submit written statements prior to the meeting (see ''Written Statements'' section for instructions).

Dated: March 27, 2019.

Shelly E. Finke,

Alternate OSD Federal Register Liaison Officer, Department of Defense.

[FR Doc. 2019–06273 Filed 3–29–19; 8:45 am]

BILLING CODE 5001–06–P

DEPARTMENT OF DEFENSE

Department of the Army, Army Corps of Engineers

Notice of Intent To Prepare an Environmental Impact Statement for the Willamette Valley System Operations and Maintenance

AGENCY: Department of the Army, U.S. Army Corps of Engineers, DoD.

ACTION: Notice of intent.

SUMMARY: The Portland District, U.S. Army Corps of Engineers (Corps) intends to prepare an Environmental Impact Statement (EIS) to address the continued operations and maintenance of the Willamette Valley System (WVS) in accordance with authorized project purposes; while meeting Endangered Species Act (ESA) obligations to avoid jeopardizing the continued existence of listed species.

The Corps will serve as the lead federal agency for purposes of the National Environmental Policy Act (NEPA).

DATES: Written comments for consideration in the development of the scope of the NEPA EIS are due to the addresses below no later than June 28, 2019.

ADDRESSES: Mailed comments may be sent to: U.S. Army Corps of Engineers, Portland District, P.O. Box 2946, Attn: CENWP–PME–E, Portland, OR 97208–2946. Email comments to: *willamette.eis@usace.army.mil.* All comments and materials received, including names and addresses, will become part of the administrative record and may be released to the public.

FOR FURTHER INFORMATION CONTACT: For questions regarding the EIS, or special accommodations for scoping process participation, please contact Suzanne Hill, Environmental Resources Specialist, (503) 808–4767.

SUPPLEMENTARY INFORMATION:

Background. The WVS consists of 13 multipurpose dams and reservoirs, riverbank protection projects in the Willamette River Basin in Oregon, and hatchery programs to mitigate for effects of the project on fish habitat. The most recent NEPA evaluation for the overall WVS operations and maintenance was an EIS completed in 1980. Since 1980, operations have been modified and structural improvements for fish passage and temperature control have been implemented to address effects of the WVS on ESA-listed fish. NEPA evaluations since the 1980 EIS have been project-specific. There is also new information relevant to the environmental impacts of operating the WVS. This EIS will evaluate the impacts of continued operations and maintenance of the WVS. The EIS will be prepared in accordance with NEPA, the Council on Environmental Quality's (CEQ) NEPA regulations (40 CFR parts 1500–1508), and the Corps' NEPA regulations (33 CFR part 230). The Corps has reinitiated formal consultation under Section 7 of the ESA on the National Marine Fisheries Service's 2008 Biological Opinion for the Willamette River Basin Flood Control Project. This NEPA process will inform the ESA Section 7 consultation process. Additionally, the Corps intends to initiate consultation under Section 106 of the National Historic Preservation Act. The Corps anticipates that the draft EIS will be made available for public comment in Fall/Winter 2020.

The Corps has invited the following Tribes and federal and state agencies to participate as cooperating agencies for the EIS: Confederated Tribes of Warm Springs, Confederated Tribes of Grand Ronde, Confederated Tribes of Siletz Indians, Cow Creek Band of Umpqua Tribe of Indians, Bonneville Power Administration, U.S. Bureau of Land Management, National Marine Fisheries Service, U.S. Bureau of Reclamation, U.S. Forest Service, U.S. Fish and Wildlife Service, Oregon Department of Fish and Wildlife, Oregon Water Resources Department, Oregon Parks

and Recreation Department, Oregon Department of Environmental Quality, Oregon Department of Land Conservation and Development, Oregon Department of State Lands, and Oregon Department of Agriculture.

Alternatives. The EIS will evaluate a no action alternative and action alternatives. The no action alternative is the current management direction for the WVS. Action alternatives will be composed of various measures for continued operations and maintenance of the WVS, as well as measures that will be developed to meet ESA obligations to avoid jeopardizing the continued existence of listed species. Comments received during the scoping comment period will inform the development of action alternatives.

Scoping Process/Public Involvement. The Corps invites all affected federal, state, and local agencies, affected Native American Tribes, other interested parties, and the general public to participate in the NEPA process during development of the EIS. The purpose of the public scoping process is to provide information to the public, narrow the scope of analysis to significant environmental issues, serve as a mechanism to solicit agency and public input on alternatives and issues of concern, and ensure full and open participation in scoping for the Draft EIS. Numerous public scoping meetings will be held during the scoping period. The specific dates, times, and locations of the meetings will be published on the Corps' project website: *https://www.mwp.usace.army.mil/Locations/Willamette-Valley/Evaluation/*.

This is not a notice for the public comment periods for the Cougar Downstream Passage and Detroit Downstream Passage projects; public comment periods for those projects will be noticed separately.

Documents and other important information related to the EIS will be available for review on the Corps' project website.

Aaron L. Dorf,

Colonel, Corps of Engineers, District Commander.

[FR Doc. 2019–06258 Filed 3–29–19; 8:45 am]

BILLING CODE 3720–58–P

DEPARTMENT OF DEFENSE

Department of the Navy

Notice of Availability of Government-Owned Inventions; Available for Licensing

AGENCY: Department of the Navy, DoD.

ACTION: Notice.

SUMMARY: The Department of the Navy (DoN) announces the availability of the inventions listed below, assigned to the United States Government, as represented by the Secretary of the Navy, for domestic and foreign licensing by the Department of the Navy.

ADDRESSES: Requests for copies of the patents cited should be directed to Naval Surface Warfare Center, Crane Div, Code OOL, Bldg 2, 300 Highway 361, Crane, IN 47522–5001.

FOR FURTHER INFORMATION CONTACT: Mr. Christopher Monsey, Naval Surface Warfare Center, Crane Div, Code OOL, Bldg 2, 300 Highway 361, Crane, IN 47522–5001, Email *Christopher.Monsey@navy.mil,* 812–854–2777.

SUPPLEMENTARY INFORMATION: The following patents are available for licensing: Patent No. 10,200,081 (Navy Case No. 200348): SYSTEMS AND METHODS FOR SIGNAL DETECTION AND DIGITAL BANDWIDTH REDUCTION IN DIGITAL PHASED ARRAYS// Patent No. 10,204,875 (Navy Case No. 200421): SYSTEMS AND METHODS FOR INHIBITING BACKEND ACCESS TO INTEGRATED CIRCUITS BY INTEGRATING PHOTON AND ELECTRON SENSING LATCH-UP CIRCUITS// Patent No. 10,209,342 (Navy Case No. 200479): ELECTROMAGNETIC RADIATION SOURCE LOCATING SYSTEM// and Patent No. 10,215,531 (Navy Case No. 200357): TESTING SYSTEM FOR OPTICAL AIMING SYSTEMS WITH LIGHT EMITTER SYSTEMS INCLUDING TESTING SYSTEM FOR THERMAL DRIFT AND RELATED METHODS.

Authority: 35 U.S.C. 207, 37 CFR part 404.

Dated: March 26, 2019.

M.S. Werner,

Commander, Judge Advocate General's Corps, U.S. Navy, Federal Register Liaison Officer.

[FR Doc. 2019–06163 Filed 3–29–19; 8:45 am]

BILLING CODE 3810–FF–P

DEPARTMENT OF DEFENSE

Department of the Navy

Notice of Extension of Public Comment Period for the Draft Supplemental Environmental Impact Statement/Overseas Environmental Impact Statement for Mariana Islands Training and Testing

AGENCY: Department of the Navy, DoD.

ACTION: Notice.

SUMMARY: A notice of public meetings was published in the **Federal Register** by the U.S. Environmental Protection Agency on January 31, 2019 and March 8, 2019 for the Department of the Navy's (DoN) Draft Supplemental Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) for the Mariana Islands Training and Testing (MITT) Study Area.

DATES: This notice announces a 15-day extension of the public comment period from April 2, 2019, to April 17, 2019.

ADDRESSES: Comments may be mailed to Naval Facilities Engineering Command Pacific, Attention: MITT Supplemental EIS/OEIS Project Manager, 258 Makalapa Drive, Suite 100, Pearl Harbor, HI 96860–3134, or electronically via the project website at *www.MITT–EIS.com.* All comments submitted during the public comment period will become part of the public record and substantive comments will be addressed in the Final Supplemental EIS/OEIS. All comments must be postmarked or received online by April 17, 2019, Chamorro Standard Time, for consideration in the Final Supplemental EIS/OEIS.

Naval Facilities Engineering Command Pacific, Attention: MITT Supplemental EIS/OEIS Project Manager, 258 Makalapa Drive, Suite 100, Pearl Harbor, HI 96860–3134.

SUPPLEMENTARY INFORMATION: The Draft Supplemental EIS/OEIS is available electronically for public viewing at *www.MITT–EIS.com* and at the following public libraries:

1. Robert F. Kennedy Memorial Library, University of Guam, UOG Station, Mangilao, GU 96923–1871.

2. Nieves M. Flores Memorial Library, 254 Martyr St., Hagåtña, GU 96910–5141.

3. Tinian Public Library, San Jose Village, Tinian, MP 96952–9997.

4. Antonio C. Atalig Memorial Library (Rota Public Library), Rota, MP 96951–9997.

5. Joeten-Kiyu Public Library, Beach Road and Insatto St., Saipan, MP 96950–9996.

Dated: March 25, 2019.

M.S. Werner,

Commander, Judge Advocate General's Corps, U.S. Navy, Federal Register Liaison Officer.

[FR Doc. 2019–06028 Filed 3–29–19; 8:45 am]

BILLING CODE 3810–FF–P

Attachment B: Public Scoping Meeting Advertisements

› PUBLIC NOTICES GENERAL

Superior Court of Washington, County of Spokane • No. 18-5-00464-6
In re parentage: Petitioner: Faith Colt, And Respondent Christopher Colt Jr.
Summons: Notice about Parentage

To the Respondent: The Petitioner started a case about parentage of children. You must respond in writing for the court to consider your side. Deadline! Your Response must be served on the Petitioner within 20 days of the date you were served this Summons (60 days if you were served outside of Washington State). If the case has been filed, you must also file your Response by the same deadline. If you do not serve and file your Response or a Notice of Appearance by the deadline: • No one has to notify you about other hearings in the case, and • The court may approve the Petitioner's requests without hearing your side (called a default judgment). Follow these steps: 1. Read the Petition and any other documents you receive with this Summons. These documents explain what the Petitions is asking for. 2. Fill out the response form the Petition. Response to Petition to: • Disprove Parentage of Presumed Parent (FL Parentage 356). You can get the Response and other forms at: • The Washington State Courts' website: www.courts.wa.gov/forms • The Administrative Office of the Courts – call: (360) 705-5328 • Washington LawHelp: www.washingtonlawhelp.org, or • The Superior Court Clerk's office or county law library (for a fee). 3. Serve (give) a copy of your Response to the Petitioner at the address below and to any other Respondents. You may use certified mail with return receipt requested. For more information on how to serve, read Superior Court Civil Rule 5. 4. File your original Response with the court clerk at this address: Superior Court Clerk, Spokane County, 1116 W. Broadway Ave., Spokane, WA 99260, 5, Lawyer not required: It's a good idea to talk to a lawyer, but you may file your response without one. Petitioner: /s/ Faith Colt 9/4/18. Petitioner agrees to accept legal papers for this case at: PO Box 1711, Omak,WA 98841.

DISTRICT COURT OF GUAM, TERRITORY OF GUAM, BANKRUPTCY DIVISION

In re: The Archbishop of Agaña, a Corporation Sole (Archbishop of Agaña)
Case No. 19-00010

YOU MAY HAVE A SEXUAL ABUSE CLAIM OR GENERAL CLAIM AGAINST THE ARCHBISHOP OF AGAÑA

On January 16, 2019, The Archbishop of Agaña ("Debtor") filed for protection under Chapter 11 of Title 11 of the United States Code.

THE LAST DAY TO FILE A SEXUAL ABUSE CLAIM OR GENERAL CLAIM AGAINST THE DEBTOR IS August 15, 2019 AT 5:00 P.M. (PREVAILING CHST-CHAMORRO STANDARD TIME).

IF YOU WERE SEXUALLY ABUSED BY ANY PERSON CONNECTED WITH THE DEBTOR OR HAVE AN UNSECURED CLAIM AGAINST THE DEBTOR, YOU MUST FILE A CLAIM BY AUGUST 15, 2019 AT 5:00 P.M. (PREVAILING CHST-CHAMORRO STANDARD TIME).

For more information on how to obtain and file a proof of claim for and associated documents please (a) visit the Debtor's website at **https://aganaarch.org**; (b) call the Debtor's hotline at 1-800-571-0657 or (c) call the Official Committee of Unsecured Creditors appointed in this case at 1-800-484-3513.

Notice of Public Hearing

Before the Insurance Commissioner of the State of Oregon Department of Consumer and Business Services
In the matter of the Acquisition of Control of ATRIO Health Plans, Inc., by Atrio Holding Company, LLC c/o Chicago Pacific Founders

6:00 PM
Wednesday May 29, 2019
Holiday Inn Express Roseburg, 375 W Harvard Ave, Roseburg, OR 97470

ATRIO Health Plans, Inc. (the "Domestic Insurer") is an Oregon-domiciled insurance company and is engaged in the business of providing Medicare Advantage plans as an insurer to individuals located in Douglas, Josephine, Jackson, Klamath, Marion and Polk counties in the State of Oregon. Atrio Holding Company, LLC ("Parent") is a Delaware limited liability company formed by Chicago Pacific Capital, L.P. (the "Sponsor") to be an indirect holding company of the Domestic Insurer.

Parent formed, as its wholly-owned subsidiary, Atrio Acquisition Corporation, a Delaware corporation ("Buyer"), for the purpose of acquiring 100% of the equity interests of the Domestic Insurer pursuant to a Stock Purchase Agreement, dated as of December 6, 2018 (the "Purchase Agreement"), by and among the Domestic Insurer, Buyer, and the current shareholders of the Domestic Insurer, (i) Cascade Comprehensive Care, Inc., an Oregon corporation ("Cascade"), (ii) Marion Polk Community Health Plan Advantage, Inc., an Oregon corporation ("MPCHPA"), and (iii) Umpqua Health, LLC, an Oregon limited liability company ("Umpqua" and together with Cascade and MPCHPA, each a "Seller" and collectively, "Sellers").

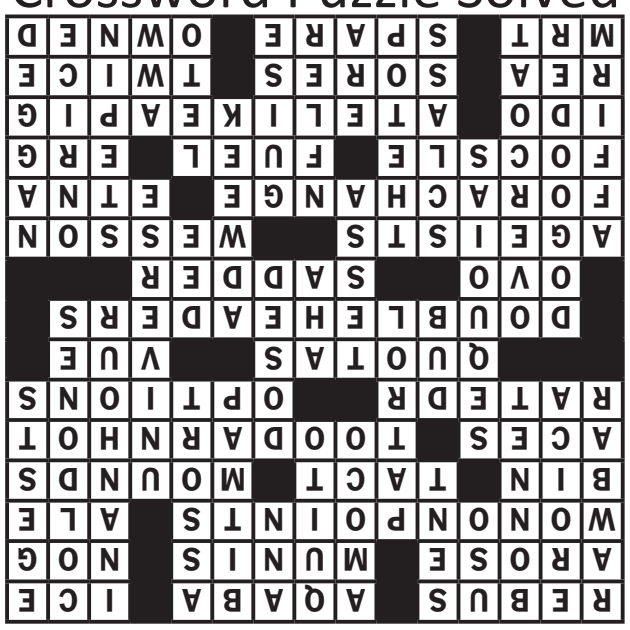
Pursuant to the Purchase Agreement, each Seller will receive a combination of cash and/or equity in Parent.

The purpose of the hearing is to to allow the public to learn more about the transaction and for the Department of Consumer and Business Services of the State of Oregon to accept public comment on the proposed transaction.

A copy of the Form A filed by Atrio Holding Company, LLC describing the transaction is available on the Insurance Division's web site at the following link:
https://dfr.oregon.gov/business/reg/insurer/mergers/Documents/atrio-cpf/atrio-atrioholding-chicagopacific-form-a.pdf

If you wish to provide public comment, you may do so at the hearing or you may provide public comment in writing until 5:00 p.m. on Wednesday June 12, 2019. Written comments should be emailed to FormAATRIO.INS@oregon.gov or by mail to Oregon Department of Consumer and Business Services, Division of Financial Regulation, ATTN: ATRIO Form A, P.O. Box 14480, Salem, OR 97309-0405.

Today's New York Times Crossword Puzzle Solved



› PUBLIC NOTICES GENERAL

CITY OF WILSONVILLE
CITY COUNCIL
NOTICE OF PUBLIC HEARING

PUBLIC NOTICE IS HEREBY GIVEN that the Wilsonville City Council will conduct a public hearing on, **May 20, 2019, 7 p.m.** at City Hall, 29799 SW Town Center Loop, Wilsonville, OR.

The purpose of this public hearing is to consider public testimony on the proposed ordinance entitled:

Ordinance No. 816

An Ordinance Of The City Of Wilsonville Repealing And Replacing Wilsonville Code Chapter 11 – Fees.

Copies of the proposed ordinances may be obtained at a cost of 25 cents per page, at City Hall or by calling the City Recorder at 503-570-1506 and requesting a copy to be mailed to you.

Specific suggestions or questions concerning the proposed ordinance may be directed to Amanda Guile-Hinman, Assistant City Attorney at 503-570-1561 or guile@ci.wilsonville.or.us. Public testimony, both oral and written will be accepted at the public hearing. Written statements are encouraged and may be submitted to the City Recorder, 29799 SW Town Center Loop E, Wilsonville, OR 97070 or by email at cityrecorder@ci.wilsonville.or.us

Assistive listening devices are available for persons with impaired hearing and can be scheduled for this meeting. The City will endeavor to provide qualified sign language interpreters without cost if requested at least 48 hours prior to the meeting. To obtain such services call the office of the City Recorder at 503-570-1506.

› PUBLIC NOTICES GENERAL

NOTICE OF BUDGET COMMITTEE MEETING

A public meeting of the Budget Committee of the Tualatin Valley Water District, Washington County, State of Oregon, to discuss the budget for the biennial period July 1, 2019 to June 30, 2021, will be held at 1850 SW 170th Ave., Beaverton, OR. The meeting will take place on Thursday, May 30, 2019 at 6:00 p.m. The purpose of the meeting is to receive the budget message and receive comment from the public on the budget. A copy of the budget document may be inspected or obtained on or after Friday, May 24, 2019 at 1850 SW 170th Ave., Beaverton, OR, between the hours of 8:00 am and 4:30 pm. Effective May 24th, the budget document can also be accessed on the District's website at **www.tvwd.org**. This is a public meeting where deliberation of the Budget Committee will take place. Any person may appear at the meeting and discuss the proposed programs with the Budget Committee. For more information, please call Tod Burton at 503.848.3000.The meeting is accessible to persons with disabilities. Requests for hearing devices, an interpreter or other accommodations for persons with disabilities should be made at least 48 hours prior to the meeting to Debbie Carper at 503-848-3000.

NOTICE OF DEATH OF UNCLAIMED BODY

GRIER, Lynda E. died 05/11/19 at Legacy Emanuel Medical Center. Anyone with information about family is asked to contact Holly Stevens @ Legacy Emanuel Medical Center, 2801 N. Gantenbein Ave, Portland, OR 97227. Tel: 503-413-4367

Summons - Case No. 34-2015-00184048

Notice to Defendant: George Leroy Williams, III (as a Nominal Defendant)
You Are Being Sued by Plaintiff MARCUS GURION, an Individual, MAXINE GURION, an Individual, ROBERT GURION, an Individual, and as Successors in interest to EVELYN GURION (Decedent). NOTICE: You have been sued. The court May decide against you without your being Heard unless you respond within 30 Days, You have 30 CALENDAR DAYS after the summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiffs. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California courts online Self-Help Center (www.courtinfo.ca.gov/selfhelp). Your county law library or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the cause by default and your wages, money and property may be taken without further warning from the court. There are other legal requirements. You may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org): the California Court Online Self-Help Center (www.courtinfo.ca.gov/Selfhelp); or contact your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration aware of $10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. The name & address of the court is: Sacramento County Superior Court, of California 720 Ninth St., Sacramento: CA 95814. The name, address, & phone number of plaintiff's attorney: Wendy C. York, SBN 166864, York Law Corporation, 1111 Exposition Boulevard, Sacramento, CA 95815. 916-643-2200 916-643-4680
Dated: Sept. 9, 2015
May 15, 22, 29 & June 5, 2019

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with NO collections, delivering newspapers as an independent contractor.

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Call today and ask about the
$300.00 sign-on bonus!

Contact us today! Call 503-221-8409 or email carrier@oregonian.com

Please let us know your name, phone number and what city or area you would like to deliver in the metro area (Beaverton, Happy Valley, Oregon City, etc. If in Portland, please specify location in the city (i.e. Garden home, Downtown, Inner southeast, etc.) We will forward this information to our Independent Distributors and they will be in contact with you ASAP.

The Oregonian

O9122019-01

› PUBLIC NOTICES GENERAL

U.S. Army Corps of Engineers
Willamette Valley System Operations and Maintenance Environmental Impact Statement

The Corps Needs Your Input!
The Corps will be hosting public meetings to gather your input and share information about the project.

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Public Meeting Information

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100 W 10th Ave, Eugene, OR 97401
Bascom – Tykeson Room

June 5 • 5 - 7:30 pm
South Salem High School Library
1910 Church St SE, Salem, OR 97302
Library – North Side Room

June 6 • 5 - 7:30 pm
University Place Hotel & Conference Center*
310 SW Lincoln St, Portland, OR 97201
Willamette Room
*Please visit our website for a coupon code for parking. You will need the code prior to parking.

June 12 • 5-7:30 pm
Corvallis-Benton Public Library
645 NW Monroe Ave,
Corvallis, OR 97330
Main Meeting Room

June 13 • 4 - 6:30 pm
Springfield City Hall
225 Fifth Street
Springfield, OR 97477
Council Chambers

Scoping Comment Period Ends June 28, 2019

For More Information and Additional Ways to Comment Please Visit the Project Website:
https://www.nwp.usace.army.mil/Locations/Willamette-Valley/Evaluation

Valley View Water District
Board Meeting

Notice is hereby given: Board Commissioners of the Valley View Water District will meet on Wednesday, May 22, at 7:30 p.m. at 3737 SW 50th Avenue, Portland, OR 97221. For agenda information, please contact Bill Richmond at 503-848-3072.

› PUBLIC NOTICES GENERAL

NOTICE OF BUDGET COMMITTEE MEETING

A public meeting of the Budget Committee of the North Clackamas Parks and Recreation District, State of Oregon, to discuss the budget for the fiscal year July 1, 2019 to June 30, 2020, will be held at 150 Beavercreek Road, Room 115, Oregon City, Oregon 97045. The meeting will take place on the 3rd day of June 2019, beginning at 9:00 A.M. The purpose of the meeting is to receive the budget message and to receive comment from the public on the budget. A copy of the budget document may be inspected or obtained on or after May 29, 2019, at 150 Beavercreek Road, Oregon City, Oregon 97045, between the hours of 7:00 A.M. and 6:00 P.M., Monday – Thursday.

This is a public meeting where deliberation of the Budget Committee will take place. Any person may appear at this meeting and discuss the proposed programs with the Budget Committee.

This notice is also posted on the web in two locations: on the District's website at **ncprd.com/financial-information** and the County's website at **www.clackamas.us/budget**

Legal Notice

Notification is hereby given that JPMorgan Chase Bank, N.A., 1111 Polaris Parkway, Columbus, Ohio 43240 has filed an application with the Office of the Comptroller of the Currency (the "OCC") on or about May 15, 2019, as specified in 12 CFR Part 5, for permission to establish a domestic branch at the northwest corner of the intersection of NE Broadway Street and NE 33rd Avenue, Portland, Multnomah County, OR 97212. Any person wishing to comment on this application may file comments in writing with the Licensing Manager, Large Banks Licensing Operations, 400 7th Street, SW, Washington, D.C. 20219 within 30 days of the date of this publication. The public portion of the filing is available upon request from the OCC. The public may find information about the filing (including the closing date of the comment period) in the OCC's Weekly Bulletin available at www.occ.gov.

Oregon Manufacturing Extension Partnership, Inc. (OMEP) is seeking a PR firm to generate and pitch story ideas featuring OMEP staff, practice areas, partners, and clients to local media and industry specific publications. OMEP is a not-for-profit team of manufacturing professionals. Applications due June 21. Details online at **www.omep.org/RFP**

BASELINE MINI STORAGE
18375 SW Baseline Rd
Beaverton 97006 503-531-9388
STORAGE AUCTION WILL BE HELD ON
StorageTreaures.com
Online Bidding starts May 15, 2019
Closes May 22, 2019 @ 10:00 AM
036 L McCain ; 433 L McCain

› SHERIFF'S SALES MULTNOMAH COUNTY

MULTNOMAH COUNTY
SHERIFF'S OFFICE
NOTICE OF SALE

On June 11, 2019 at 12:00 PM at the Multnomah County Sheriff's Office, 4735 E Burnside St., Portland, OR, I will sell, subject to redemption, subject property legally described as: , 735 SE Rene Avenue Gresham, OR 97080. The court case number is 18CV32671. The case is entitled: CITIGROUP MORTGAGE LOAN TRUST INC. ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2007-AMC4, U.S. BANK NATIONALASSOCIATION, AS TRUSTEE,, Plaintiff v DASHIA L. CHASTEEN; MIDLAND FUNDING, LLC; AND ALL OTHER PERSONS OR PARTIES UNKNOWN CLAIMING ANY RIGHT, TITLE, LIEN, OR INTEREST IN THE REAL PROPERTY COMMONLY KNOWN AS 735 SOUTHEAST RENE AVENUE, GRESHAM, OREGON 97080,, Defendants. The sale is a public auction to the highest bidder for cash or cashier's check, in hand, made payable to Multnomah County Sheriff's Office. For more information on this sale go to:
http://www.oregonsheriffs.org/
May 15, 22, 29 & June 5, 2019

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U.S. Army Corps of Engineers Willamette Valley System Operations and Maintenance Environmental Impact Statement

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June 6 2019	University Place Hotel & Conference Center** 310 SW Lincoln St, Portland, OR 97201 Willamette Room	4-6:30 pm
June 12 2019	Corvallis-Benton Public Library 645 NW Monroe Ave, Corvallis, OR 97330 Main Meeting Room	5-7:30 pm
June 13 2019	Springfield City Hall 225 Fifth Street Springfield, OR 97477 Council Chambers	4-6:30 pm

**Please visit our website for a coupon code for parking at University Place Hotel and Conference Center. You will need the code prior to parking.

Scoping Comment Period Ends June 28, 2019

For More Information Please Visit the Project Website: www.nwp.usace.army.mil/Locations/Willamette-Valley/Evaluation

spec-2/113

Albany Democrat Herald

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PamplinClassifieds

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WEDNESDAY, MAY 22, 2019

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EMPLOYMENT

BULLETIN BOARD

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2019-2020
Salary: $15.08 - $16.69
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Gervais School District
2019-2020
Salary: $38,420 - $65,126
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P/T, 3-4 hours/day when needed. Horse experience preferred.
Call 503-266-4367

Announcements/ Notices

MOLALLA AA GROUP
Wed & Fri 7:30-9 pm
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are always found when shopping in the Community Classifieds!
Subscribe today 503-620-9797

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DO YOU KNOW ME?

(photo from 1977)
Mark Steven Monroe
Born Aug 18, 1959
Hasn't been seen since 1977. Brother Gregg, Sister Holly & Brother Ricky are looking to reconnect. If you know Mark or have any information, please call **Mandi @ 509-217-9025 or Gregg @ 360-595-7010.**

Business Directory Ads Work!
Call today! **503-620-7355**

Personals

SINCERE SENIOR
Divorced white male. Retired Army Veteran in good health wishes to meet sincere retired female. For lifetime commitment. Age/weight unimportant. Must be able to relocate. No homeowners please. Must be serious and sincere for replies. No games. Write Mike's with phone number.
PO Box 4457 Tumwater, WA 98501

BUSINESS

Business Opportunities

Residential Painting Company with four rigs and painting equipment.
Looking for serious inquiries for purchasing.
Call 971-322-4586

HelpWanted

HS Specialist II/QMHP
Job #BH19-030 - Yamhill County Adult Behavioral Health - F/T $4317 - $4906/month + Excellent benefits. Closes when filled. For details, visit **www.co.yamhill.or.us** EOE

Utility Worker
Job #PW19-032 - Yamhill County Public Works
F/T $2673 - $3108/month + Excellent benefits. Closes 5/23/19. For details, visit www.co.yamhill.or.us. EOE

The City of Donald: Public Works Maintenance Worker
F/T, 40 hours a week, including rotation of stand-by time (compensated at $20/day). Starting $15.48 per hour. Great benefits. For details and application visit www.donaldoregon.gov or get packet at Donald City Hall. No resumes needed, just completed City application. Recruitment Closes 5/30/2019 at 4pm.

Pamplin MediaGroup

NEWSPAPER DELIVERY
Columbia County Spotlight is looking for a delivery person to deliver our weekly newspaper in the Scappoose & St Helens area to local stores, schools and racks every Friday morning. Must have a reliable and insured vehicle. Must pass background driving check.

Please call or email Kim Stephens for more information
kstephens@pamplinmedia.com, 971-204-7818.

Pamplin MediaGroup

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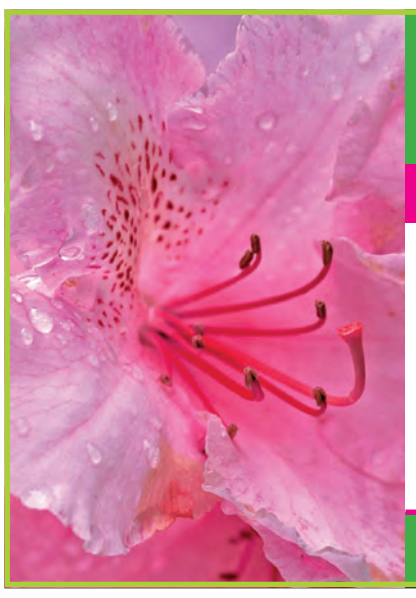

Rhododendron Sale

FIELD CLEARANCE

May 3rd, 4th, 5th
May 17th, 18th, 19th • May 24th, 25th, 26th
Closed Mother's Day Weekend

$9 ALL SIZES
9am - 5pm

Cash only, no checks (Credit cards accepted for purchases over $80)
(While supplies last) Pre-Dug, No Pots

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Public Notices

Public Notices

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U.S. Army Corps of Engineers

Willamette Valley System Operations and Maintenance Environmental Impact Statement

The Corps Needs Your Input!

The Corps will be hosting **public meetings** to gather your input and share information about the project.

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The New Era

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Suislaw News

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Publication Date: May 22, 2019

Statesman Journal and Stayton Mail

U.S. Army Corps of Engineers
Willamette Valley System Operations
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US Army Corps of Engineers
Environmental Impact

To be published: 5.23.19

Thank you,
The Creswell Chronicle

Eugene Weekly

U.S. Army Corps of Engineers

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Arrest made in pair's disappearance

Man suspected of murder, kidnapping

ANDREW SELSKY
Associated Press

W. Fretwell K. Fretwell

SALEM — Police arrested a man Friday on suspicion of murder and kidnapping following the disappearance of a woman and their 3-year-old son.

A search was continuing for the mother and son, but police had little hope they were alive.

M. Wolfe

Karissa Fretwell, 25, of Salem, and her son William haven't been heard from since May 13.

Michael John Wolfe, the child's biological father, was arrested at a doughnut shop in the Portland area, Salem police Lt. Treven Upkes said at a news conference.

Photos of the suspect with a distinctive walrus mustache and thinning brown hair had been published in newspapers and broadcast on TV news.

Wolfe, 52, of Gaston is being charged with two counts of aggravated murder and two counts of kidnapping, police said.

"Everybody that's been involved in this case continues to hope for the safe return of Karissa and William," Upkes said.

The mother and son were last seen in west Salem, Upkes said. Her family reported them missing when she didn't show up for work May 17.

Police, including divers, were searching a rural area southwest of Portland.

"It's taking an incredible toll on everybody who's out there. They're working around the clock, following all leads," Upkes said.

Court papers show Fretwell went to court last year to establish that Wolfe was William's father. A DNA test verified her claim, and Fretwell then filed a petition seeking more than $1,000 a month in child support from Wolfe, court records show.

Wolfe is married to another woman, police confirmed.

Upkes said there were aspects of the case he couldn't reveal because the investigation was ongoing. He did say there are no additional suspects.

He said Wolfe would be lodged in the jail in Yamhill County, where the search is being carried out.

Fretwell's Facebook page is full of smiling photos of her and William, including one in the hospital right after his birth. She is a student at Western Oregon University.

In her profile, she wrote "My son is my world ... Future WOU graduate, BIG DREAMER!"

Fretwell's sister did not immediately return a message sent through Facebook.

Samaritan Health reports $160.8M in benefit

BENNETT HALL
Corvallis Gazette-Times

Samaritan Health Services spent $160.8 million on community benefit activities last year, the regional health care system said Wednesday in announcing the release of its 2018 annual report.

Based in Corvallis, Samaritan operates five hospitals, 80 physician clinics, several health insurance plans, four fitness centers and other businesses employing about 5,100 people in Linn, Benton and Lincoln counties.

As a tax-exempt nonprofit entity, Samaritan is required by law to provide a certain amount of charity care and other benefits to the areas in which it operates. Last year's tally was $156.4 million.

Charity care for uninsured patients totaled $14.3 million in 2018, up $2.2 million from the year before.

That number was much higher before Medicaid eligibility was expanded in 2013, said Julie Manning, Samaritan's vice president for marketing, public relations and community health promotion.

"In our region alone, that brought 30,000 people onto Medicaid," Manning said.

As a result, Samaritan's costs for uncompensated care plunged from $22.8 million in 2013 to $9.6 million the following year, Manning said. Since then, however, the figures have slowly begun to creep up again.

"Ninety-five percent of Oregonians have insurance now, so it's holding together," she said. "But we have started to see charity care kick back up somewhat."

Manning said the reasons for that increase could include the growing number of people in "gig economy" jobs with no benefits, as well as the rise in high-deductible health plans, which could result in charitable write-offs for people who show up at the hospital insured but unable to pay out-of-pocket costs.

The lion's share of Samaritan's community benefit expenses, however, go to cover the unpaid costs of public insurance programs.

Last year, the health care system wrote off $119.3 million in unpaid costs of treating patients covered by Medicare and the Oregon Health Plan, the state's version of Medicaid. That represents Samaritan's estimate of the difference between the actual cost of care and the reimbursement rates paid by Medicare and Medicaid.

That number is down slightly from 2017, when Samaritan reported $120.8 million in unpaid costs of public programs.

In other community benefits for 2018, Samaritan Health Services reported spending:

- $10 million in subsidized health services, the estimated loss incurred in providing emergency and trauma care, behavioral health services, hospice care and other program areas that don't generate profits.
- $8.2 million for health professions education, which compensates attending physicians and nurses who supervise medical residents and nursing trainees in Samaritan hospitals.
- $3 million in cash and in-kind contributions to needy individuals and charitable organizations. That figure includes $450,000 in "social accountability" grants awarded to more than 40 community agencies in the tri-county area.
- $2.8 million in community health improvement services such as free classes, clinics and workshops.
- $2.3 million toward community-building activities such as funding the Samaritan Early Learning Center, which provides subsidized child care in Lincoln City.
- $794,000 on clinical trials and other research activities.
- $402,000 in overhead costs associated with providing community benefit activities.

Read the report

To read an online version of Samaritan Health Services' 2018 annual report, click here.

Reporter Bennett Hall can be reached at 541-758-9529 or bennett.hall@lee.net. Follow him on Twitter at @bennetthallgt.

Advocate groups oppose plan to kill ravens

PORTLAND (AP) — Environmental advocates in Oregon have criticized a state plan to kill more than 1,000 ravens to help save the greater sage grouse, officials said.

The Oregon Department of Fish and Wildlife applied for permits in 2018 to kill up to 500 ravens per year over a three-year period to reduce the number preying upon greater sage grouse eggs, The Oregonian/OregonLive reported Tuesday.

The strategy of putting poisoned chicken eggs in bait boxes in northeastern Oregon's Baker County is flawed, environmentalists said.

Environmental groups including Oregon Wild, The Humane Society and the Center for Biological Diversity oppose the plan.

The strategy is part of "an unfortunate pattern of wildlife agencies scapegoating one wildlife species for the decline of another" without addressing primary causes of decline, said Bob Sallinger, conservation director at the Portland Audubon Society.

Population estimates show the sage grouse has declined by 30% across its native range, which includes 11 western states and parts of Canada. In Oregon where ravens are targeted, the grouse population has fallen by 75% since 2005.

Studies showing ravens' effect on sage grouse nesting were conducted in Nevada, and Oregon "has not produced adequate science to support killing ravens," Sallinger wrote on the Portland Audubon website.

Environmentalists also said many more poisoned eggs need to be distributed than the number of ravens targeted, creating the potential to kill other species.

The poison was chosen because it is lethal to ravens, crows and gulls and only moderately toxic to raptors and some other birds with almost no effect on mammals, said Michelle Dennehy, a wildlife agency spokeswoman.

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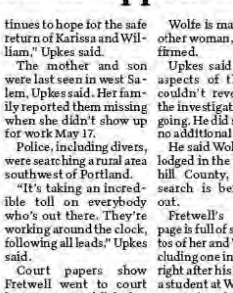
King Crossword



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May Junior Rotarians 2019

Dina Andreyvina Altuhovs

My name is Dina Andreyvina Altuhovs and I am a junior at LHS. I am the last of nine to graduate from Lebanon high school in the spring of 2020. I hope to be valedictorian and end High School with honors. My parents are Irina and Andrey Altuhov. At LHS I participate in track, cross country, leadership, and national honors society. The only hobby I really have is running, I have been doing it for over 6 years competitively. After Highschool, I hope to go to OSU to pursue a major in Chemistry.

Taylor Bilyeu

My name is Taylor Bilyeu and I am a 16 year old Junior at Lebanon High School. I am the daughter of Ty Bilyeu of Albany and Jack & Jeanice Myrtue of Lebanon. I really enjoy music and have been a band member for 6 years. I play the oboe for the Wind Ensemble at LHS and for the Corvallis Youth Symphony in Corvallis and have been involved in several honor bands as well. I am a member of the National Honor Society and hope to be valedictorian for the Class of 2020.

Aden Aerni

My name is Aden Aerni and I have been given the opportunity to be one of Eliot Lion Chemistry Junior Scientists. I have an older sibling, my sister, Logan. My dad, Dale, and mom, Connie, work at Symmetry Brewery. My dad is now an investor in the company. We all have lived most of our lives and raised [illegible] in the Albany/Lebanon area.

I have been blessed to have been part through the Christian education many generations. The two classes that have always been my favorite would be Mathematics and History. I played football my freshman and sophomore year and I continue to compete in Track and Field. I have always enjoyed school in general, the great friends and trials that have challenged me to be better.

For the past three summers I have worked in Brownsville Services as a field technician. I plan to attend a journeyman program for plumbing as well as getting an online business degree. Someday in the future I hope to buy the business from my parents and keep it in the family. Following my career I would love to travel and implement missions into work as well. Aside from the business world I enjoy, I love to woodwork, build with technology, and do mechanical work.

Victoria Shelton

My name is Victoria Shelton, and I am a junior at Lebanon High School. I have lived in the town all of my life, with the exception of living in Scott Mills for about nine months as a very young girl. My family history is mostly centered in "Lebanon Natives". My mother, Anna Shelton Swanson, attended Eliot Elementary, Seven Oaks Junior High, and graduated from Lebanon High School. I have two siblings, who currently attend Riverview and Seven Oaks. Throughout my three years of being here at LHS, I have been able to participate in many of our sports programs, including volleyball, basketball, and track. I have also been able to be a part of Key Club, the National Honor Society, and I've been able to work with many children within the community as a Parent Camp aide/helper for two consecutive years at Camp Tadmor. Sometimes I work at my father's local business, Willamette Cleaning Company, whenever my help is needed. When I am not involved with a school activity or work, I try to take that time to relax, read, travel, hike, run, visit my grandparents, or, simply, mostly, to do what one I have graduated, my hope is to attend Linn-Benton Community College, and to obtain an Associate's degree in Nursing. I am planning to specialize in Labor and Delivery, and to continue on another school to obtain my Bachelor's, or even my Master's degree, with the hopes of becoming a "nurse practitioner". I can't help but be excited for the next 2 years of Lebanon's Junior Rotarians!

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Social equity questions arise over pot

'Legalization 2.0' efforts take aim at complex issues

JENNIFER PELTZ
Associated Press

NEW YORK (AP) — Advocates for legalizing marijuana have long argued it would strike a blow for social justice after a decades-long drug war that disproportionately targeted minority and poor communities.

But social equity has been both a sticking point and selling point this year in New York and New Jersey, among other states weighing whether to join the 10 that allow recreational use of pot.

Complicating the lawmaking process, sometimes even among supporters, are questions about how best to erase marijuana convictions and ensure that people who were arrested for pot benefit from legal marijuana markets.

Advocates say legalization elsewhere hasn't done enough to achieve those goals. Critics maintain legal pot is even accelerating inequality as the drug becomes big business for companies generally run by white men.

"We're at the stage of marijuana reform 2.0," said Douglas Berman, an Ohio State University law professor who follows marijuana policy. The conversation, he said, has shifted from just being about legalization to, "which track should we make sure we head down?"

Questions about conviction-clearing and other issues contributed to delaying legislative votes on legalizing recreational pot that had been expected earlier this spring in New York and New Jersey. The states' Democratic governors and legislative leaders support legalization but confronted differences even within their own party.

The New Jersey measure fizzled last week, when the state Senate president said he'll aim for a 2020 referendum while pursuing separate legislation to expand medical marijuana and expunge low-level pot convictions.

GLEN STUBBE, ASSOCIATED PRESS FILE

In this May 2015 photo, marijuana plants grow at a Minnesota Medical Solutions greenhouse in Otsego, Minn. Advocates for legalizing marijuana have long argued it would strike a blow for social justice after a decades-long drug war that disproportionately targeted minority and poor communities.

Meanwhile, some New York lawmakers said they'll soon unveil an updated proposal to legalize pot and foster racial and economic equity. Activists remain hopeful the state can set an example.

"Social justice is what's going to propel us, not what's going to hold us back," said Kassandra Frederique, the New York director for the pro-legalization Drug Policy Alliance.

Federal data shows similar percentages of white and black people use marijuana. But the arrest rate for blacks is higher, according to reports by the American Civil Liberties Union and others.

Legalization of recreational pot in 10 states and the District of Columbia, and medical pot in two-thirds of the states, hasn't eliminated the gaps. In Colorado, for instance, a state report found arrests were fewer but the rate remained higher among blacks five years after a 2012 vote for legalization.

Meanwhile, the emerging marijuana industry is very white, according to the limited data available.

"It's obviously a problem," said Morgan Fox of the National Cannabis Industry Association, which has helped craft suggestions for social equity legislation.

Another industry group, the Cannabis Trade Federation, last week announced plans to craft a diversity and equity policy in conjunction with national NAACP officials and other civil-rights advocates.

Some would-be minority entrepreneurs have been caught in a cannabis Catch-22, unable to work in a legal pot business because of a past conviction. Others struggle to raise startup money in an expensive industry that banks are leery about entering because of the federal government's prohibition on pot.

"We're not going to have much time to make a space in the market for ourselves," said Jason Ortiz, vice president of the Minority Cannabis Business Association.

Marijuana got Ortiz arrested as a teenager, but now he hopes to start a business if recreational pot becomes legal in Connecticut, where he lives.

Some states and cities have started post-legalization initiatives to expunge criminal records and open doors in the cannabis business for people with pot convictions. California, for instance, passed a sweeping expungement law last year affecting hundreds of thousands of drug offenders.

New Jersey Sen. Cory Booker has proposed a national legalization measure that includes expungements and a community "reinvestment" fund, and several of his fellow Democratic senators and 2020 presidential primary contenders have signed on.

Some veterans of early state legalization campaigns have reckoned with their limitations.

"We were overly cautious at the time, looking back," said Art Way, the Drug Policy Alliance's director in Colorado. "But it didn't feel that way" when legalizing marijuana and ending many arrests were unprecedented goals in themselves.

He's been fighting to make Colorado's cannabis industry more accessible to people with drug convictions and entrepreneurs of modest means.

Opponents, too, are looking at how legalization has played out. They say it shows authorizing pot is no way to help minorities.

"The social justice issue is a big front" for states and big business to make money off marijuana, said New Jersey Legislative Black Caucus Chairman Ronald Rice, a Democratic senator from Newark and former police officer. He supports ending criminal penalties for marijuana but not legalizing recreational use.

"I know what social justice looks like," Rice says. "I also know when people are being used."

He doesn't foresee pot shops enhancing neighborhoods where drugs have been a wellspring of problems. And he's skeptical that, even with special incentives, residents would reap the profits in an industry already infused with big money.

New York Assemblywoman Crystal Peoples-Stokes agrees legalizing marijuana isn't a panacea for minority communities. But the Assembly's first African-American majority leader is championing a recreational-pot proposal that's currently being revised.

"It will not end racism. But it is a crucial step in the right direction," Peoples-Stokes, a Buffalo Democrat, recently wrote in Newsweek.

Woman checks skid marks, finds injured man

PORTLAND (AP) — An Oregon woman likely saved a man's life when she stopped to investigate skid marks on a mountain road and spotted an SUV crashed below, emergency responders said.

Laurie Bowers of Happy Camp on Saturday morning stopped to look over a cliff on Grayback Road, a circuitous route in the Siskiyou Mountains of southwest Oregon. Bowers spotted a red Jeep about 50 feet below, The Oregonian/OregonLive reported.

A single tree held the SUV from sliding down a roughly 40-degree slope, said Ned Booth, public information officer at the Illinois Valley Fire District. The vehicle otherwise likely would have plunged another 1,000 feet, Booth said.

"It's a good thing she was traveling by," Booth said.

Emergency responders found the driver suffering from hypothermia. He had a badly fractured leg and internal bleeding. He was airlifted to Asante Rogue Regional Medical Center in Medford.

The extraction of the driver on the steep mountainside was perilous, Booth said.

The driver's name has not yet been released. Booth said the man was in his 30s or early 40s.

The driver told rescuers he crashed at around 2 a.m. Saturday. Rescuers were dispatched shortly after 10 a.m.

Search and rescue crews often take some time to reach rural parts of the Siskiyou Mountains. However, a team of paramedics and rescue personnel were conducting a routine exercise in Cave Junction and were able to respond quickly, Booth said.

"Everything just worked out real nice," he said.

OREGON NOTES

Small quake hits coast

ROSELODGE (AP) — The U.S. Geological Survey says a magnitude 3.7 earthquake hit along Oregon's coast.

The agency says the earthquake struck a spot 1.3 miles southwest of Rose Lodge, a town of about 1,900 people, at 9:23 a.m. Sunday. The earthquake had a depth of 29 miles.

The Oregonian/OregonLive.com reports that minor shaking was reported along the coast from Waldport to Cloverdale, with scattered reports further inland. No damage was reported.

Crash injures two officers

PORTLAND (AP) — Two Portland police officers were treated for injuries after a vehicle crashed into their patrol car and pushed it into them.

The Oregonian/OregonLive reports the crash occurred at around 2:30 a.m. Sunday.

The officers were responding to an assault.

They were outside their patrol car on Southeast McLoughlin Boulevard when a vehicle traveling north struck their patrol car.

The impact sent the patrol vehicle into both officers.

The officers and the driver were taken to a hospital. Police describe their injuries as non-life threatening.

Two injured in shooting

PORTLAND (AP) — Police in Portland say at least two people were shot at an event venue in southeast Portland.

KOIN television reports police took a call on the shooting shortly after 12:30 a.m. Sunday in the 200 block of southeast Madison Street.

Emergency responders found two people wounded and rushed them by ambulance to hospitals.

Police say others may have been hurt.

Witnesses told officers others may have been taken to hospitals in private cars.

Names of the injured were not immediately available.

Police did not release suspect information immediately but asked witnesses to call them.

Study probes options for Hanford waste

ANNETTE CARY
Tri-City Herald

KENNEWICK, Wash. (AP) — Two methods could be developed to treat some of Hanford's radioactive tank waste that would cost significantly less than vitrifying it, or turning it into a stable glass form at the Hanford vitrification plant, according to a draft report by a panel of experts.

The Washington state Department of Ecology says it is keeping an open mind on the proposed technologies, but has many questions about the determination that they would be "as good as glass."

The department, a Hanford regulator, gave its opinion on the proposed options Thursday in Kennewick as a committee of the National Academies of Sciences met to discuss supplemental treatment of low-activity radioactive waste at Hanford.

Congress in 2016 ordered the analysis of options for treating some of Hanford's 56 million gallons of radioactive waste held in underground tanks, which is being done by a panel of experts from Department of Energy national laboratories.

The April draft report looked at supplemental treatment methods for low activity radioactive waste.

Vitrifying the waste, which could be done by expanding the nuclear reservation's vitrification plant, would have the highest cost at $20 billion to $36 billion, it found.

Encasing the waste in a concrete-like grout would have the lowest cost at $2 billion to $8 billion.

The other possibility is steam reforming, which would blend the waste with dry materials at high temperatures to produce ceramic-like particles at a cost of $6 billion to $17 billion.

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DEBATE

From Page A1

statewide boundaries," Brown said.

Her comments came a day after she slapped down a stance by Curtis Melcher, director of the Oregon Department of Fish and Wildlife. He wrote to federal officials on May 9, saying his agency supports delisting wolves because the animals no longer meet the definition of an endangered or threatened species.

Brown said her office had not been informed that Melcher would take the stance. When she learned of it, she put on the brakes.

"The state of Oregon and its agencies do not support the delisting of wolves from the federal Endangered Species Act across their range in the 48 contiguous states," Brown wrote in a letter to U.S. Interior Secretary David Bernhardt.

A total of 6,500 wolves are believed to roam Minnesota, Wisconsin, Michigan, Rocky Mountains and Pacific Northwest. Additional wolves inhabit Indiana, Kentucky, Massachusetts, Maine, Missouri, Ohio, Utah and Vermont.

Collette Adkins, carnivore conservation director at the Center for Biological Diversity, said more than a half-dozen states have no wolf protections on the books.

In his letter, Melcher said Oregon had 137 wolves at the end of 2018 — a 10% increase over 2017. He also said Oregon is committed to ensuring the progress of the species while minimizing livestock losses.

However, his advocacy of federal delisting of wolves brought howls of complaint when it was publicized.

U.S. Rep. Earl Blumenauer, an Oregon Democrat, told Melcher in a letter that he was "shocked and appalled."

"I am ashamed by your willingness to throw an incredibly important predator species under the bus in favor of a few private interests that clearly have a different mission than your agency," Blumenauer wrote.

Noah Greenwald, endangered species program director at the Center for Biological Diversity, said: "Lifting federal protections now would hamper further wolf recovery in Oregon and expose the animals to killing by the state."

The federal government has already delisted wolves in the eastern one-third of Washington and Oregon, as well as in Idaho, Montana and Wyoming. It contends that gray wolves no longer qualify for federal protection as an endangered or threatened species.

Oregon officials have drafted a new state wolf plan aimed at ensuring "the conservation of gray wolves as required by Oregon law while protecting the social and economic interests of all Oregonians."

Oregon removed wolves from its state endangered species list in 2015. A prime objective of the draft plan is to promote a naturally reproducing wolf population connected to a larger population of wolves and allowing for expansion into other areas of the state.

POT

From Page A1

legalization to, "which track should we make sure we head down?"

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Legalization of recreational pot in 10 states and the District of Columbia, and medical pot in two-thirds of the states, hasn't eliminated the gaps. In Colorado, for instance, a state report found arrests were fewer but the rate remained higher among blacks five years after a 2012 vote for legalization.

In Oregon, Portland voters who approved a city marijuana sales tax in 2016 aimed to devote proceeds partly to small businesses — especially minority- and women-owned businesses — and economic and education programs in communities where pot was heavily policed.

A city auditor's report this month found 16% of the over $8 million tax haul so far has gone to those purposes. About 80% has gone to traffic safety initiatives, and the rest mainly to services for drug and alcohol users.

"The limited money to address the historical effects of cannabis prohibition may not be" what voters who backed the tax expected, the auditors wrote.

Meanwhile, the emerging marijuana industry is very white, according to the limited data available.

"It's obviously a problem," said Morgan Fox of the National Cannabis Industry Association, which has helped craft suggestions for social equity legislation.

Another industry group, the Cannabis Trade Federation, this week announced plans to craft a diversity and equity policy in conjunction with national NAACP officials and other civil-rights advocates.

Democratic presidential candidate Sen. Cory Booker, D-N.J., answers questions last month during a presidential forum on the Texas State University campus in Houston. Booker has proposed a national marijuana legalization measure that includes expungements of criminal records for marijuana offenses. [AP PHOTO/MICHAEL WYKE, FILE]

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As an aspiring marijuana businessman in New York, Andrew Farrior is following the legalization debate and its talk of social equity.

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June 6 5-7:30 pm	University Place Hotel & Conference Center* 310 SW Lincoln St, Portland, OR 97201 Willamette Room
June 12 5-7:30 pm	Corvallis-Benton Public Library 645 NW Monroe Ave, Corvallis, OR 97330 Main Meeting Room
June 13 4-6:30 pm	Springfield City Hall 225 Fifth Street Springfield, OR 97477 Council Chambers

*Please visit our website for a coupon code for parking. You will need the code prior to parking.

Scoping Comment Period Ends June 28, 2019

For More Information and Additional Ways to Comment Please Visit the Project Website:
https HYPERLINK "https://www.nwp.usace.army.mil/Locations/Willamette-Valley/Evaluation/"://www.nwp.usace.army.mil/Locations/Willamette-Valley/Evaluation

EO-0000134959-01

Attachment C: Public Scoping Meeting Sign-In Sheets

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Date: June 4, 2019
Location: Eugene Public Library

US Army Corps of Engineers®
Portland District

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Coy Spiker	Springfield OR	cory.spiker@[illegible]gmail.com ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other
Andrew Janos	Eugene, OR	Andrew.janos@EWEB.ORG ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☒ Project Website ☐ Flyer ☐ Other
Ryan Thompson	Dorena, OR	ryan@mtnaireng.com ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other
KRISTIN KESSLER	EUGENE, OR	KRISTIN.KESSLER78@gmail.com ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
[illegible]	Veneta, OR	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
Caroline Seifert	Veneta, OR	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Date: June 4, 2019
Location: Eugene Public Library

US Army Corps of Engineers®
Portland District

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
LILY DIXON CASCADIA ACTION NETWORK	EUGENE, OR	DIXON.LILY2@GMAIL.COM ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☒ Project Website ☐ Flyer ☐ Other
Rich Aaring EYC	Eugene OR	clubmanager@eugeneyachtclub.org ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☑ Other
Kelly Reis, ODFW	Springfield	kelly.e.reis@state.or.us ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
Mike Brinkley	Eugene	mbrinkle@comcast.net ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
Judith Callens	Salem OR	jcallens@oda.state.or.us ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☑ Other
Doug Heiken	Eugene OR	dh@oregonwild.org ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☑ Other

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Date: June 4, 2019
Location: Eugene Public Library

US Army Corps of Engineers®
Portland District

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Shelley Reed RAWCD	JC, OR	sreed@msn.com ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☑ Other
Zach Loboy ODEQ	Eugene, OR	loboy.zach@deq.state.or.us ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
BILL LANDLES	EUGENE	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
Dave Thomas	Eugene	davesthomas1939@gmail.com ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
BRYAN HARPER	JUNCTION CITY	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
Andy Hamilton	Eugene	ahamilt@blm.gov ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Kai Nopdhaku - Me	Eug	CoyoteTongue@Gmail.com ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other

Date: June 4, 2019 **Location:** Eugene Public Library

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Date: June 5, 2019

Location: South Salem High School Library

US Army Corps of Engineers®
Portland District

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Howard Schierling	Salem OR	HJDNSchierling@gmail.com ☐ Please check if you would like to receive email notifications.	☑ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
Nancy Grulich	DEQ Salem	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
Betsy Verhoeven OSU Extension	Salem, OR	betsy.verhoeven@oregonstate.edu ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other Farm Bureau mailing
Chad Ball Marion County	Salem, OR	cball@co.marion.or.us ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
Dylan Wells Marion County Farm Bureau	Woodburn, OR	Dylan@AutumnHarvestPumpkins.com ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other
Karin Stutzman POLK Soil & Water Conserv. District	Dallas, OR	manager@polkswcd.com ☐ Please check if you would like to receive email notifications.	☒ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Anne Mullan	Portland OR	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other
Fritz Graham Office of US Senator Ron Wyden	Salem OR	fritz_graham@wyden.senate.gov ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
John Zielinski Marion County Farm Bureau	Salem OR	john@ezorchards.com ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other
Gary Pullman NESCA	Salem	gary.pullman@gmail.com ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☑ Other : ☐ Email
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other : ☐ Email
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other : ☐ Email
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other : ☐ Email

Date: June 5, 2019 **Location:** South Salem High School Library

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Date: June 5, 2019

Location: South Salem High School Library

US Army Corps of Engineers®
Portland District

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Alvin Klausen Office of Congressman Schrader	Salem OR	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other
Richard D Brust Jr Monmouth		Eugene Yachts Bulletin ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☒ Flyer ☒ Other
Mike McCord	Salem OR.	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other
John Stockfleth Stockfleth Farms	St Paul Or	stockfleth71@gmail.com ☐ Please check if you would like to receive email notifications.	☒ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other
Chad Woods Polk County SWCD	Dallas Or	cwoods@wondermere.com ☒ Please check if you would like to receive email notifications.	☒ Newspaper Ad ☒ Project Website ☐ Flyer ☒ Other
Sam. Sweeney Yamhill SWCD	Dayton OR	Sweeneyfarm@aol.com ☒ Please check if you would like to receive email notifications.	☒ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Ronald L Garst Padding River Watershed	Silverton OR	ronleegarst@gmail.com ☒ Please check if you would like to receive email notifications.	☒ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other E-mail
Judith Callens Dept. of Agriculture	Salem OR	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other
Jennifer Fairbrother Native Fish Society	Canby, OR	☐ Please check if you would like to receive email notifications.	☑ Newspaper Ad ☑ Project Website ☑ Flyer ☑ Other
Chandra Ferrari Trout Unlimited	Salem, OR	cferrari@tu.org ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☑ Project Website ☐ Flyer ☑ Other:
Brent Stevenson Santiam Water Control Dist	Stayton OR	BrentS@Santiamwater.com ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☐ Email
Don Elgas Retired Power Plant Guy		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☐ Email
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☐ Email

Date: June 5, 2019 **Location:** South Salem High School Library

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Date: June 6, 2019

Location: Portland State University Conference Center

US Army Corps of Engineers®
Portland District

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Stephanie Page ODA	Salem OR	spage@oda.state.or.us ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
Olivier Jamin DWT	Portland, OR	olivierjamin@dwt.com ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☒ Project Website ☐ Flyer ☐ Other
Shane Scott Public Power Council	Portland, OR	shane@scottanderson associates.com ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☑ Other
Tom Skiles, CRITFC	Portland, OR	skit@critfc.org ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☒ Project Website ☐ Flyer ☐ Other
Grace Stratton, Wyden	Portland, OR	grace_stratton@wyden.senate.gov ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other ☐ Email
Anne Mullan	PDX	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other ☐ Email

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Mackenzie Keith USGS	Portland OR	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
Brian Posewitz Water Watch of Oregon	Portland OR	brian@waterwatch.org ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
CHARLES ORMSBY (SKIP) Birdshill CPO/NA (Riverside 29) Clackamas Co / City of LAKE OSWEGO	Portland OR	birdshillcpona@gmail.com ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other PT Email
Rich Doming	Oak Grove OR	rkdominguez@msn ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other
Niki Iverson City of Hillsboro	Hillsboro OR	niki.iverson@hillsboro-oregon.gov ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ ~~Other~~ Email
Mary Anne Cooper Oregon Farm Bureau	Salem OR	maryanne@ofbf.org ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ ~~Other~~
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other

Date: June 6, 2019 **Location:** Portland State University Conference Center

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Date: June 12, 2019

Location: Corvallis-Benton Public Library

US Army Corps of Engineers®
Portland District

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Rob Bignall Willamette Salmon Steelhead Recovery Coalition Northwest Guides Anglers Assn	Sherwood Oregon	rob.bignall@gmail.com ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☐ Email
Courtney Flathers Officer U.S. Senator Jeff Merkley	Eugene OR	courtney_flathers@merkley.senate.gov ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☒ Email
Toby Lewis Benton County	Corvallis, OR	toby.a.lewis@co.benton.or.us ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☒ Email
Lauren Rosenberg Benton County	Corvallis, OR	Lauren.nr7@hotmail.com ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other: ☐ Email
Kristen Larson Luckiamute Watershed Council	Independence OR	director@luckiamutelwc.org ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☒ Email
Anne Brett	John Brett	biophilic1089@gmail.com ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other: Walkin ☐ Email

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Date: June 12, 2019

Location: Corvallis-Benton Public Library

US Army Corps of Engineers®
Portland District

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Amy Kaiser USDA	Tangent, OR	amy.kaiser@usda.gov ☒ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☒ Flyer ☐ Other: ☐ Email
JMorgan	Salem OR	jmorgan@oda.state.or.us ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☑ Email
Emelie Frojen CRITFC	Portland, OR	efrojen@critfc.org ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☑ Email
Andrew Chione OSU	Corvallis, OR	chionea@oregonstate.edu ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☑ Project Website ☐ Flyer ☐ Other: ☐ Email
Bob Rees Assoc. NW Steelheaders	Oregon City OR	brees@pacifier.com ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☑ Flyer ☐ Other: ☐ Email
June Chada Office of U.S. Senator Wyden	Eugene OR	june_chada@wyden.senate.gov ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☐ Email

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Date: June 12, 2019

Location: Corvallis-Benton Public Library

US Army Corps of Engineers®
Portland District

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Brian Carroll - Linn County Parks	Albany, OR	BCARROLL@co.linn.or.us	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☐ Email
		☒ Please check if you would like to receive email notifications.	
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☐ Email
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☐ Email
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☐ Email
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☐ Email
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other: ☐ Email

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Date: June 13, 2019

Location: Springfield City Hall

US Army Corps of Engineers®
Portland District

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Phil Brozek Brozek & Associates / Local Stakeholder	Eug. OR	phil.brozek@gmail.com ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other ☒ Email
Amanda Ferguson	Cottage Grove, OR	planner@cottagegrove.org ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other ☒ Email
Andy Limbird	Springfield	alimbird@springfield-or.gov ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other Word of Mouth ☐ Email
Mark Rust	Springfield	mrust@springfield-or.gov ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other ☒ Email
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other ☐ Email
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other ☐ Email

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Date: June 13, 2019

Location: Springfield City Hall

US Army Corps of Engineers®
Portland District

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Jo Morgan	Salem OR	jmorgan@oda.state.or.us ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other – explain ☑ Email
Charlie Becard	Eugene OR	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other – explain ☑ Email
Charlie Conrad	Lane County	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other – explain ☑ Email
Sarah Dyrdahl	Eugene, OR	already do ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other – explain ☒ Email
Ryan Thompson	Dorena, OR	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other (Christine from Corps) – explain ☐ Email
Ellen Myers	Eugene, OR	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☒ Other – explain ☐ Email USACE employee?

Willamette Valley System Operations & Maintenance Environmental Impact Statement

Name and Organization	City, State	E-Mail	How did you hear about the meeting?
Clayton McEachern Engineer City of Springfield	Springfield, OR	cmceachern@springfield-or.gov ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other – ☑ Email
Ken Vogeney Springfield Emergency Manager	Springfield	kvogeney@springfield-or.gov ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other – ☑ Email
BILL LANDLES	EUGENE	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☑ Project Website ☐ Flyer ☑ Other – ☑ Email
Robin Leighty EUGENE WATER & ELECTRIC BOARD	EUGENE. OR	robin.leighty@eweb.org ☑ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☑ Other – Word of Mouth ☐ Email
Clinton Begley Long Tom Watershed Council	Eugene OR	☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☑ Project Website ☐ Flyer ☒ Other – ☐ Email
Levi Leathorberry	Eugene, OR	levitck@gmail.com * Please send slides ☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☑ Project Website ☐ Flyer ☐ Other – ☐ Email
		☐ Please check if you would like to receive email notifications.	☐ Newspaper Ad ☐ Project Website ☐ Flyer ☐ Other – ☐ Email

Date: June 13, 2019 **Location:** Springfield City Hall

Attachment D: Public Scoping Meeting Poster Boards

Willamette Valley System Operations and Maintenance Environmental Impact Statement

Public Scoping Meeting Boards

June 2019

What is NEPA?

THE NATIONAL ENVIRONMENTAL POLICY ACT OF 1969

NEPA Overview

- NEPA requires all federal agencies to analyze potential environmental, social, and economic impacts of their proposed actions as well as to identify and consider reasonable alternatives to those actions
- NEPA encourages **public involvement** at multiple stages throughout the process to help inform decision makers on how the impacts of proposed actions might affect citizens and communities
- Early outreach in the NEPA process is particularly important to allow the public to **meaningfully comment** and help to **shape the analysis**

The public can participate in the NEPA process by:

- ☐ Commenting on the proposed actions
- ☐ Helping identify the issues to be considered
- ☐ Helping formulate alternatives based on purpose and need
- ☐ Providing information

The NEPA process for the Willamette Valley System involves:

- A system-wide evaluation of the environmental impacts of how USACE operates and maintains the Willamette Valley System (WVS)
- Incorporating measures to meet Endangered Species Act (ESA) obligations into operations and maintenance of the WVS

QUESTIONS TO CONSIDER WHEN PROVIDING INPUT TO USACE

- How do the operations of the Willamette Valley System impact you or resources that are important to you?
- What resources should be evaluated in the EIS?
- What are some of the challenges that you see with system operations?
- What opportunities are there for improving system operations?
- Propose an idea for a solution/measure for improvements to system operations.
- What issue or challenge would your proposed opportunity/solution address?

WAYS TO COMMENT

Mailed comments may be sent to:
U.S. Army Corps of Engineers,
CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946

Emailed comments may be sent to:
willamette.eis@usace.army.mil

Online comments may be made through the Public Comment Portal. The Public Comment Portal can be found on the project website:
https://www.nwp.usace.army.mil/Locations/Willamette-Valley/System-Evaluation-EIS/

COMMENT PERIOD CLOSES: JUNE 28, 2019

Where are we in this process?

Scoping Period

PURPOSES OF SCOPING:

- Provide information to the public
- Narrow the scope of the EIS to resources of concern
- Solicit public input on alternatives and issues of concern
- Ensure full and open participation in scoping for the Draft EIS

NEPA Process	Spring/ Summer 2019 (WE ARE HERE)	Fall/Winter 2019	Public Comment: Winter 2021	Spring/Summer 2023

Step 1: Project Initiation
• Develop Purpose and Need
• Develop preliminary scope of the EIS
	Step 2: Scoping
	• Publish Notice of Intent
	• Hold Public Meetings
	• Solicit input regarding:
	  • Scope of analysis
	  • Issues to consider
	  • Alternative development
	Concludes June 28, 2019
		Step 3: Alternatives Development
		• Develop alternatives screening criteria
		• Develop alternatives by combining remaining measures
		• Screen alternatives to a reasonable array
			Step 4: Analyze
			• Describe affected environment
			• Assess impacts of reasonable array of alternatives
			• Identify preferred alternative/proposed action
			• Draft EIS documenting natural, cultural, and socioeconomic impacts
				Step 5: Decision
				• Review and develop responses to comments on Draft EIS
				• Incorporate information from BiOp into the EIS
				• Provide final EIS for public review
				• Prepare and Publish Record of Decision

Stakeholder/ Public Engagement	**Public Scoping *(req)*** Scoping Report (April 1- June 28, 2019)	**Public Outreach** Information Sharing	**Public Comment *(req)*** Release Draft EIS (45-day comment period)	**Public Review *(req)*** Release Final EIS (30-day review)
ESA Process	**Step 1: Develop Biological Assessment** • Description of listed species and critical habitat • Description of action area		**Step 2: Draft BA** • Proposed Action Description • Effects analysis and determination • Transmit to the Services	

QUESTIONS TO CONSIDER WHEN PROVIDING INPUT TO USACE

- How do the operations of the Willamette Valley System impact you or resources that are important to you?
- What resources should be evaluated in the EIS?
- What are some of the challenges that you see with system operations?
- What opportunities are there for improving system operations?
- Propose an idea for a solution/measure for improvements to system operations.
- What issue or challenge would your proposed opportunity/solution address?

WAYS TO COMMENT

Mailed comments may be sent to:
U.S. Army Corps of Engineers,
CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946

Emailed comments may be sent to:
willamette.eis@usace.army.mil

Online comments may be made through the Public Comment Portal. The Public Comment Portal can be found on the project website:
https://www.nwp.usace.army.mil/Locations/Willamette-Valley/System-Evaluation-EIS/

COMMENT PERIOD CLOSES: JUNE 28, 2019

Project Background

The U.S. Army Corps of Engineers (USACE), Portland District manages a complex system of **13 interrelated dams and reservoirs, riverbank protection projects,** and **hatchery programs** within the Willamette Valley System (WVS) to balance the priorities of the region as a whole. Together, the dams in the system are operated for the following purposes, which vary depending on the dam: flood risk management, hydroelectric power, irrigation, navigation, water quality, fish and wildlife, industrial and municipal water supply, and recreation.

The most recent NEPA evaluation for **operations and maintenance (O&M)** in the Willamette Valley System was an Environmental Impact Statement (EIS) completed in 1980. USACE is developing a new EIS because:

- Operations have been modified
- Several Willamette Valley fish species have been listed as threatened under the Endangered Species Act (ESA), requiring structural improvements for fish passage and temperature control
- New information on environmental impacts in the WVS has become available

The **benefits and trade-offs** will be analyzed through the development of alternatives and analysis of potential environmental impacts of continued O&M of the WVS.

Authorized Project Purposes

Dam & Reservoir	Flood Control	Irrigation	Navigation	Hydropower	Fish & Wildlife	Water Quality	Recreation	Water Supply
Detroit	✓	✓	✓	✓	✓	✓	✓	✓
Big Cliff				✓			✓	✓
Green Peter	✓	✓	✓	✓	✓	✓	✓	✓
Foster	✓	✓	✓	✓	✓	✓	✓	✓
Cougar	✓	✓	✓	✓	✓	✓	✓	✓
Blue River	✓	✓	✓	✓*	✓	✓	✓	✓
Hills Creek	✓	✓	✓	✓	✓	✓	✓	✓
Lookout Point	✓	✓	✓	✓	✓	✓	✓	✓
Dexter				✓			✓	✓
Fall Creek	✓	✓	✓		✓	✓	✓	✓
Dorena	✓	✓	✓		✓	✓	✓	✓
Cottage Grove	✓	✓	✓		✓	✓	✓	✓
Fern Ridge	✓	✓	✓		✓	✓	✓	✓

*Although hydropower is an authorized purpose of Blue River Dam & Reservoir, hydropower facilities have not been developed there to date.

Foster

Green Peter

Purpose and Need

"The purpose and need is continued operations and maintenance of the Willamette Valley System (WVS) in accordance with authorized project purposes; while meeting Endangered Species Act (ESA) obligations to avoid jeopardizing the continued existence of listed species."

EXAMPLES OF AREAS THAT WILL BE EVALUATED IN THE EIS FOR THE PROPOSED ACTION AND ALTERNATIVES INCLUDE:

- Air Quality
- Cultural Resources
- Economics
- Environmental Justice
- Fish and Wildlife
- Recreation
- Social Considerations
- Tribal Interests
- Vegetation
- Wetlands
- Water Quality

Dexter

Alternatives Development

NEPA requires federal agencies to study, develop, and describe a reasonable range of alternatives for their proposed actions.

- The EIS will evaluate the environmental impacts from a range of alternatives and provide a comparative analysis of the alternatives
- Only the alternatives that will achieve the purpose and need for the proposed action will be evaluated

What is an alternative?

One or more **measures, strategies,** or **programs** functioning together to address the purpose and need statement.

What is a measure?

A **feature** or **activity** that addresses one or more objectives.

Measures are:
- **Temporal** - activity may happen at a specific time and/or over a specific duration
- **Dimensional** - can come in different sizes, scales, designs, or materials
- **Location-based** - can be implemented at one or more geographic sites

Measures are:
- **Non-structural activity:** such as a change in operations, a policy, practice or (a different) way of doing something or managing resources that does not require construction but has a measurable impact
- **Structural feature:** requires construction or assembly on-site

As the proposed action is O&M of the system, **alternatives will be primarily composed of non-structural measures.**

Example Measures:
- Modification of flow targets based on new research
- Modification of operations for changing temperatures to meet temperature targets
- Expansion of Control Points – improve measurement of unregulated flow and improve real time flood management

How will the Corps screen measures?

Does the measure meet purpose and need?

Does the measure meet project objectives?

Other screening criteria:
- Technical feasibility
- Unacceptable environmental impacts
- Implementation risk
- Dam safety

How will the Corps develop alternatives for this project?

1. **Define problems and opportunities**
2. **Develop measures that address the purpose and need for the project** — WE ARE HERE
3. **Refine and screen measures**
4. **Develop alternatives to address each strategy**
5. **Analyze alternatives**
6. **Apply alternative selection criteria and finalize**

PROJECT PURPOSE	PRELIMINARY OBJECTIVES
Flood Risk Management	• Maintain current flood risk level • Bank Revetments- Maintain current levels of erosion reduction and flood risk management
Hydropower	• Maintain operational flexibility & opportunity to produce hydropower • Maintain emergency power pools until they are needed
Bank Protection	• Continued O&M of WVS bank protection projects • Modify to improve habitat attributes for F&W
ESA-listed F&W	• Reduce project effects sufficiently to avoid jeopardizing ESA-listed species or adversely modifying critical habitat
Non-ESA F&W	• Provide benefits as part of a balanced operational strategy across authorized purposes and to address national Corps environmental stewardship goals
Harvest Hatchery Mitigation	• Meet mitigation commitments, reduced as mitigation purpose addressed with improved fish access to habitat above dams
Conservation Hatchery Support	• Produce and release hatchery Chinook to meet ESA goals for reintroduction and to provide a ESA-species safety net
Recreation	• Provide recreational opportunity as part of balanced operational strategy across authorized purposes • Prioritize Detroit, Foster, and Fern Ridge reservoir elevations
Instream Water Quality	• Provide instream water quality for attainment of State water quality standards as part of balanced operational strategy across authorized purposes • Operate to provide flows for ESA-listed fish • Operate to meet minimum flow targets • Operate to meet water temperature targets • Operate to meet TDG targets
Water supply (Ag, M&I)	• Manage reservoir storage and releases during the conservation season to meet authorized purposes for water supply

QUESTIONS TO CONSIDER WHEN PROVIDING INPUT TO USACE

- How do the operations of the Willamette Valley System impact you or resources that are important to you?
- What resources should be evaluated in the EIS?
- What are some of the challenges that you see with system operations?
- What opportunities are there for improving system operations?
- Propose an idea for a solution/measure for improvements to system operations.
- What issue or challenge would your proposed opportunity/solution address?

WAYS TO COMMENT

Mailed comments may be sent to:
U.S. Army Corps of Engineers,
CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946

Emailed comments may be sent to:
willamette.eis@usace.army.mil

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COMMENT PERIOD CLOSES: JUNE 28, 2019

Operating the Willamette Valley System

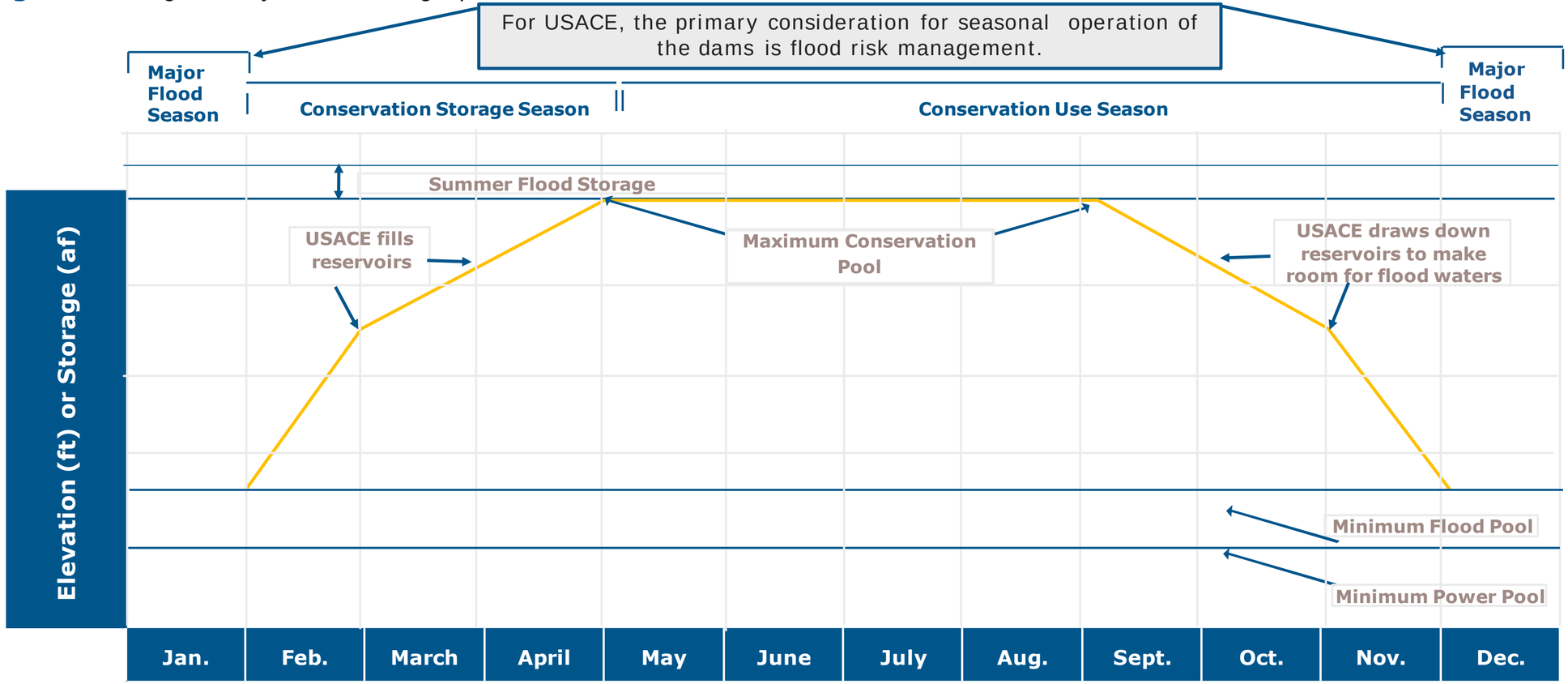
USACE developed a **water control diagram** for the operation of each dam, reflecting the balancing of project purposes when operating the various dams.

USACE releases river flows from the reservoirs to meet a variety of purposes, including water quality, water supply, and fish and wildlife needs (including flow requirements for endangered species).

Typical seasonal operations are shown in the **rule curve**, which is the maximum elevation USACE should keep a reservoir at during the year. Each reservoir has its own specific **water control diagram** but it generally follows the graphic below.

Typical Seasonal Operations

Season	Timing	Operation
Major Flood	Nov/Dec- Jan	Reservoirs are maintained at **minimum flood pool** elevation to provide storage capacity for flood risk management.
	Feb- May	Conservation filling period is February through early May. During the refill period, space in the reservoirs is filled gradually and typically reach **maximum conservation pool** by mid-April to mid-May
		Reservoirs are maintained at maximum conservation pool elevation to provide for: irrigation, recreation, power production, and meeting minimum flow for fish. In late summer, reservoirs are gradually drafted (drawn down) to regain capacity for flood risk management.



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ESA and NEPA

Under the **Endangered Species Act (ESA)**, federal agencies like USACE are required to consider effects of their proposed actions on **threatened and endangered species** in a project area.

The **US Fish and Wildlife Service (FWS)** and the **National Marine Fisheries Service (NMFS)** administers the ESA and lists **threatened and endangered species**. FWS and NMFS (collectively, the **Services**) work with other federal agencies to protect threatened and endangered species and their habitats.

Under **NEPA**, federal agencies are required to consider the potential impacts of their proposed actions. This includes impacts on **ESA-listed species** and their habitats.

Since the last consultation with the **Services** in 2008, USACE has been actively taking steps to address impacts on **ESA-listed species**. Building on this progress, USACE will consider additional actions to address effects of operations and maintenance of the Willamette System on endangered species through this new EIS.

Once a draft EIS is completed, and the preferred alternative is identified, USACE will consult with the **Services** as required by the **ESA**. USACE will submit a biological assessment describing the proposed federal action based on the draft EIS preferred alternative, and effects on **ESA-listed species** and their habitat. The **Services** will prepare biological opinions for species affected by the proposed action. Results of the consultation will be incorporated into the final EIS.

Aquatic T&E Species in the Willamette River Basin

- Bull trout
- Upper Willamette River spring chinook salmon
- Upper Willamette River winter steelhead

Bull Trout

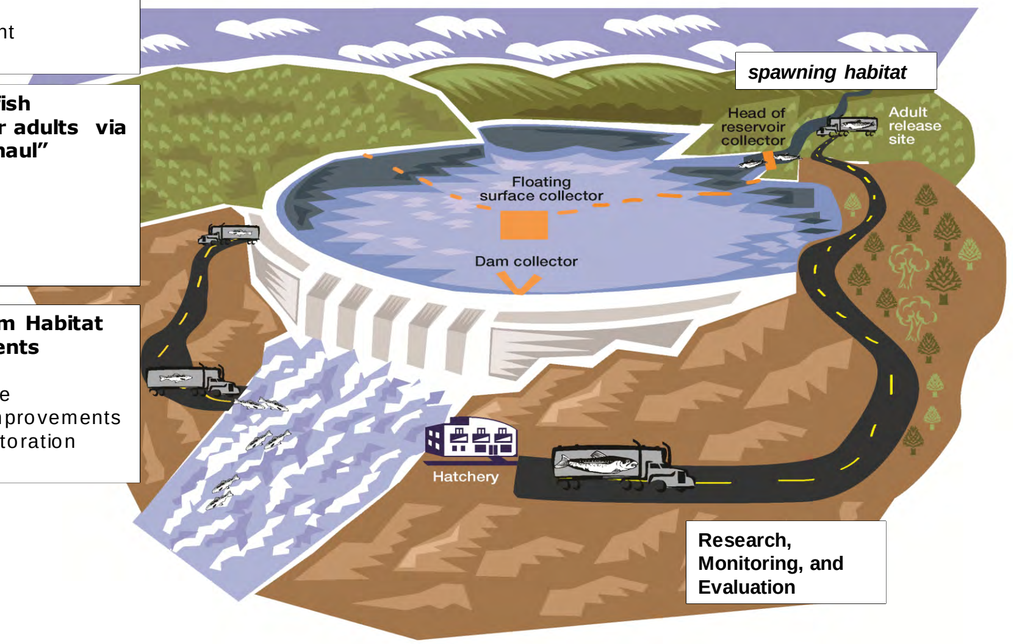
Upper Willamette River spring Chinook salmon

2008 Willamette BiOp Actions: A Life-Cycle Approach

Evaluate Feasibility of Downstream Fish Passage Facilities
- Cougar
- Lookout Point
- Detroit

Upstream fish passage for adults via "trap-and-haul"
- Cougar
- Minto
- Foster
- Dexter
- Fall Creek

Downstream Habitat Improvements
- Flow
- Temperature
- Hatchery improvements
- Habitat Restoration Projects



The four dams pictured are primary locations identified for fish passage improvements. These dams are located in the North and South Santiam, McKenzie and Middle Fork Willamette River sub-basins.

QUESTIONS TO CONSIDER WHEN PROVIDING INPUT TO USACE

- What resources should be evaluated in the EIS?
- What challenges do you see with system operations?
- What ideas do you have to improve system operations for:
  -ESA-listed species,
  -other native fish and wildlife,
  -hatchery management?

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ESA and NEPA

QUESTIONS TO CONSIDER WHEN PROVIDING INPUT TO USACE

- What resources should be evaluated in the EIS?
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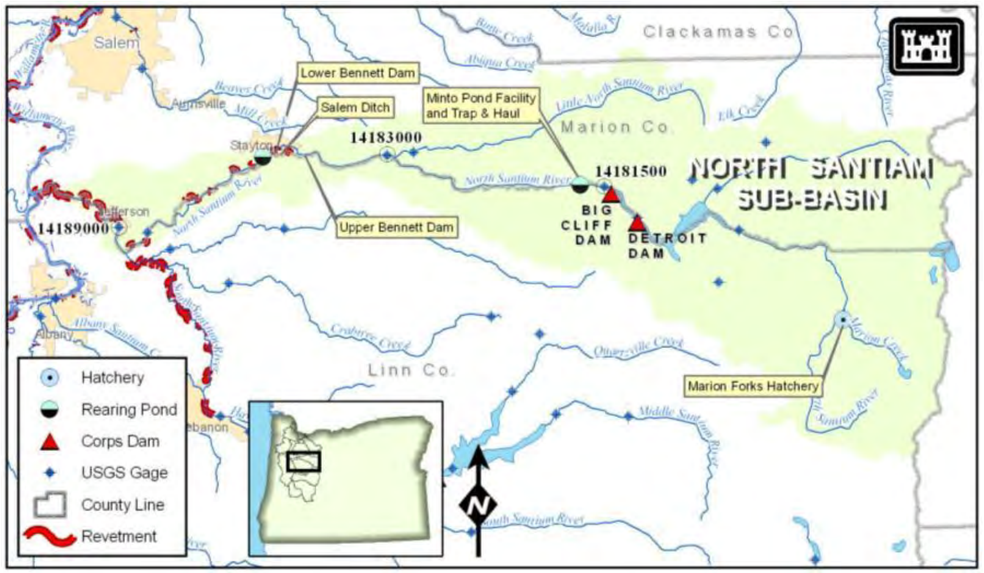
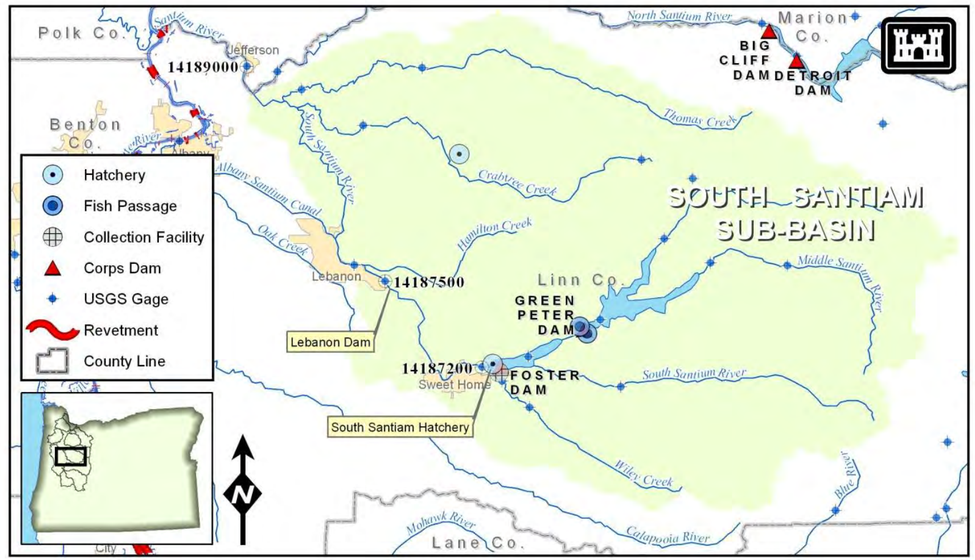
COMMENT PERIOD CLOSES: JUNE 28, 2019

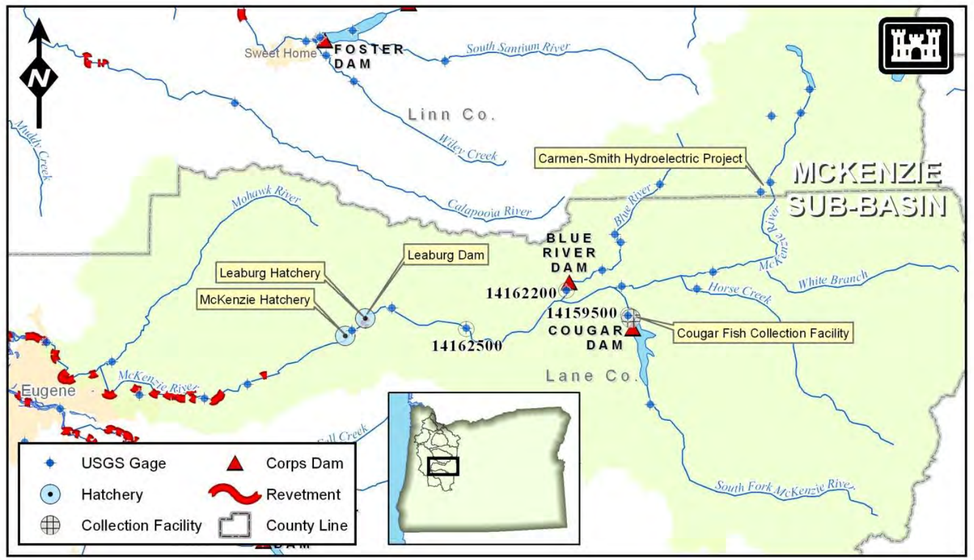
North Santiam Subbasin



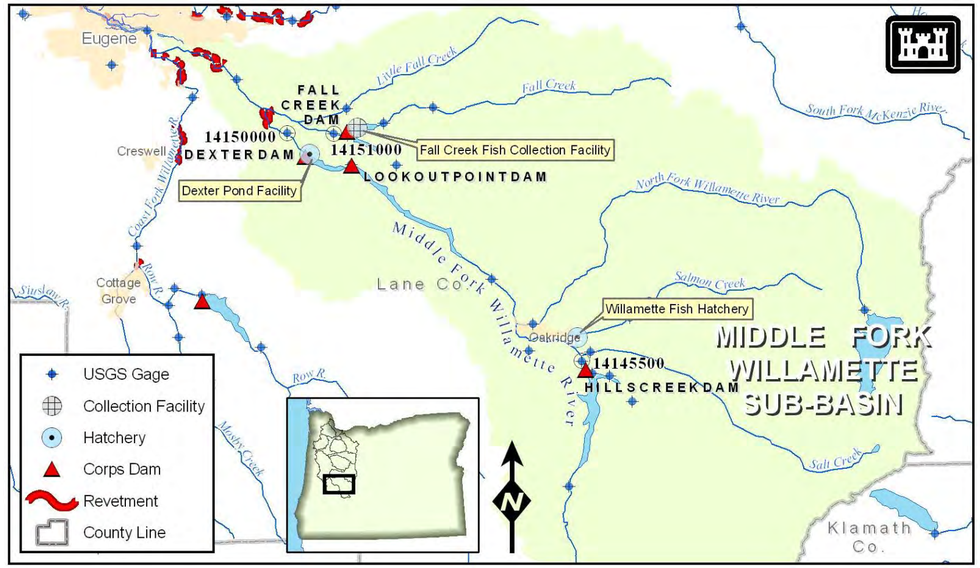
South Santiam Subbasin



McKenzie Subbasin



Middle Fork Willamette Subbasin



Attachment E: Public Scoping Meeting Presentation

WILLAMETTE VALLEY SYSTEM OPERATIONS AND MAINTENANCE ENVIRONMENTAL IMPACT STATEMENT

Public Scoping Meeting Presentation

Mike Turaski, Project Manager
Dustin Bengtson, Deputy Operations Project Manager
Rich Piaskowski, Fish Biologist
Suzanne Hill, Environmental Resources Specialist

June 2019

US Army Corps of Engineers ®
Portland District

OBJECTIVE OF THE PUBLIC SCOPING MEETINGS

Provide information about:

- Willamette Valley System Operations
- Development of the EIS
- Integration of the NEPA and ESA consultation processes
- Public Engagement Opportunities

Provide an opportunity for the public to:

- Interact with Corps Staff
- Comment on the Scope of the EIS
- Get engaged at the earliest opportunity in the development of the EIS

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WELCOME AND PRESENTATION OVERVIEW

- Welcome
- Overview of the Willamette Valley System Operations
- Endangered Species Act Consultation Overview
- Willamette Valley System Operations and Maintenance Environmental Impact Statement (EIS) Overview

WILLAMETTE VALLEY SYSTEM OVERVIEW

WILLAMETTE VALLEY HISTORY

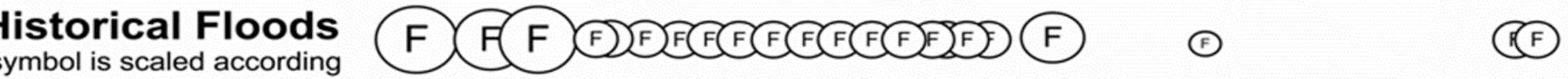
1936- Congress passed Flood Control Act authorizing Corps to survey flood problems in the Willamette Basin

1938- Flood Control Act provided for the first seven dams and storage reservoirs

1940- Corps began construction of Fern Ridge and Cottage Grove dams

1950 and **1962** Flood Control Acts authorized additional structures

1969- Blue River Dam was completed



Historical Floods
(symbol is scaled according to flood magnitude)

Historical Events

1850-1895: Early Settlement

Settlers arrive via Oreon Trail.

Steamboats become main source of transportation in Willamette Valley.

Corps of Engineers begins navigation improvements in 1868 (snag removal, construction of wing dams, closing side channels).

Floodplain largely avoided by settlers; some logging & patches of agriculture

1895-1932: Settlement Expansion

Navigation improvements continue.

Large-scale timber harvest along floodplain & uplands.

Some expansion of agriculture on to floodplain

1932-1972 Development

13 flood control dams constructed

Extensive bank protection revetments constructed.

Agriculture & suburban communities expand onto historic floodplain.

1970s-1995 Continued Development

Much of Willamette stabilized by flood control dams & revetments

Migration rates & avulsion frequency decrease

Expansion of urban developments onto historical floodplain

WILLAMETTE VALLEY PROJECT – 13 MULTI-PURPOSE DAMS

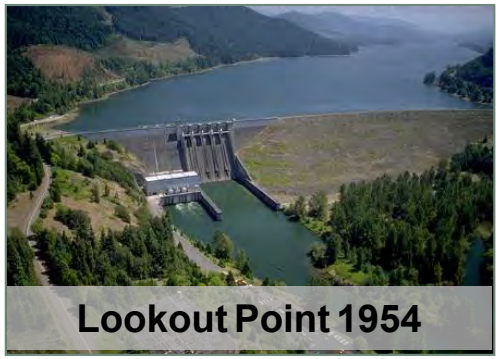
Fern Ridge 1941

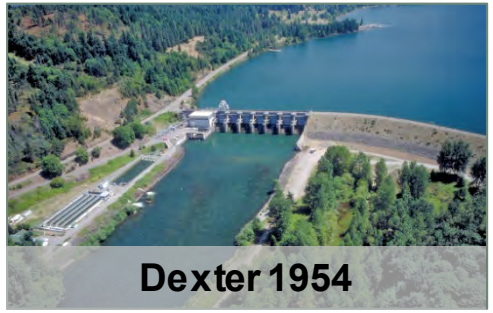
Cottage Grove 1942

Dorena 1949

Detroit 1953

Big Cliff 1953

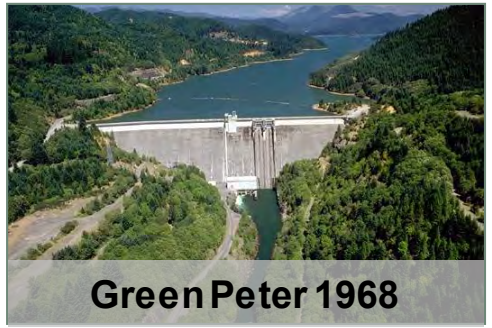

Lookout Point 1954

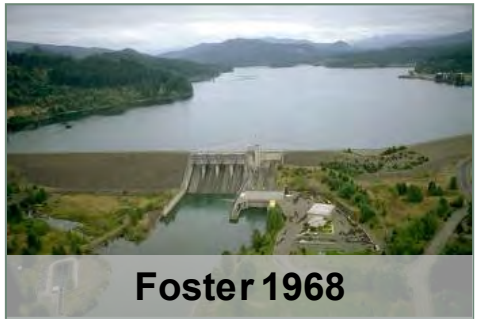

Dexter 1954

Hills Creek 1961

Cougar 1963

Fall Creek 1965


Green Peter 1968


Foster 1968

Blue River 1969

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WILLAMETTE VALLEY PROJECT

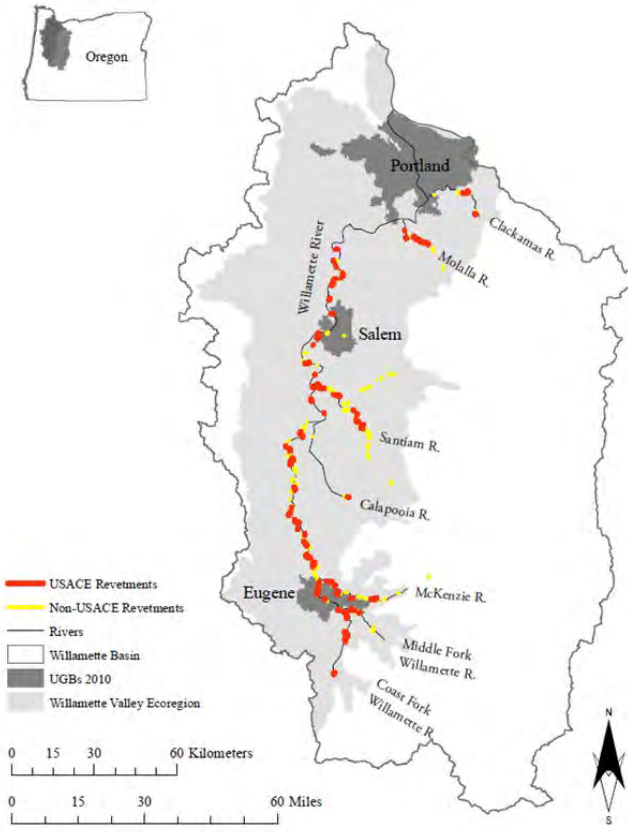
13 Reservoirs

- 11 Multiple-purpose
- 2 Re-regulating
- 8 hydropower

5 Fish Hatcheries

Willamette Bank Protection Program

- 100 miles of revetments
- Mainstem and tributaries



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AUTHORIZED PURPOSES

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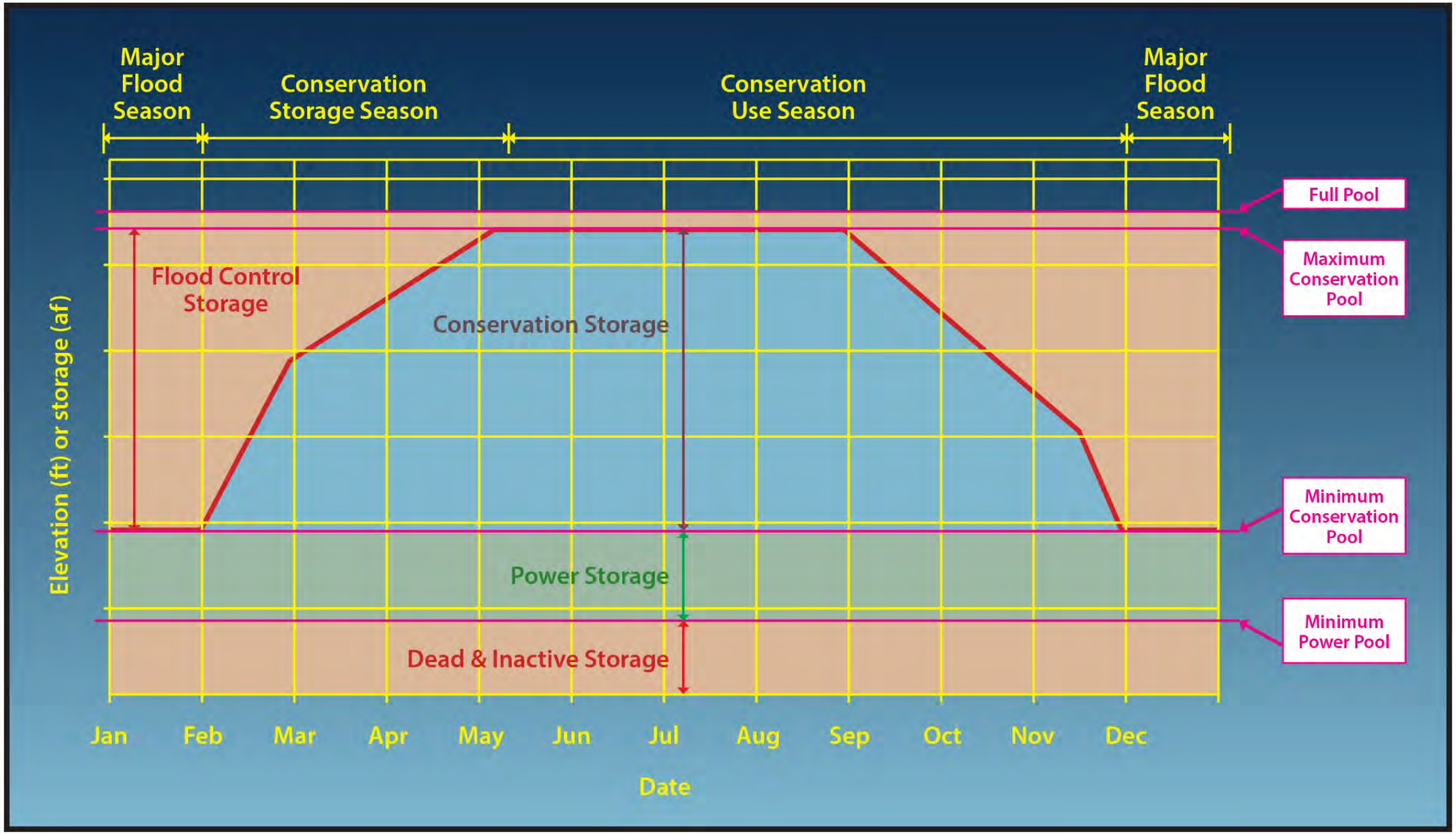
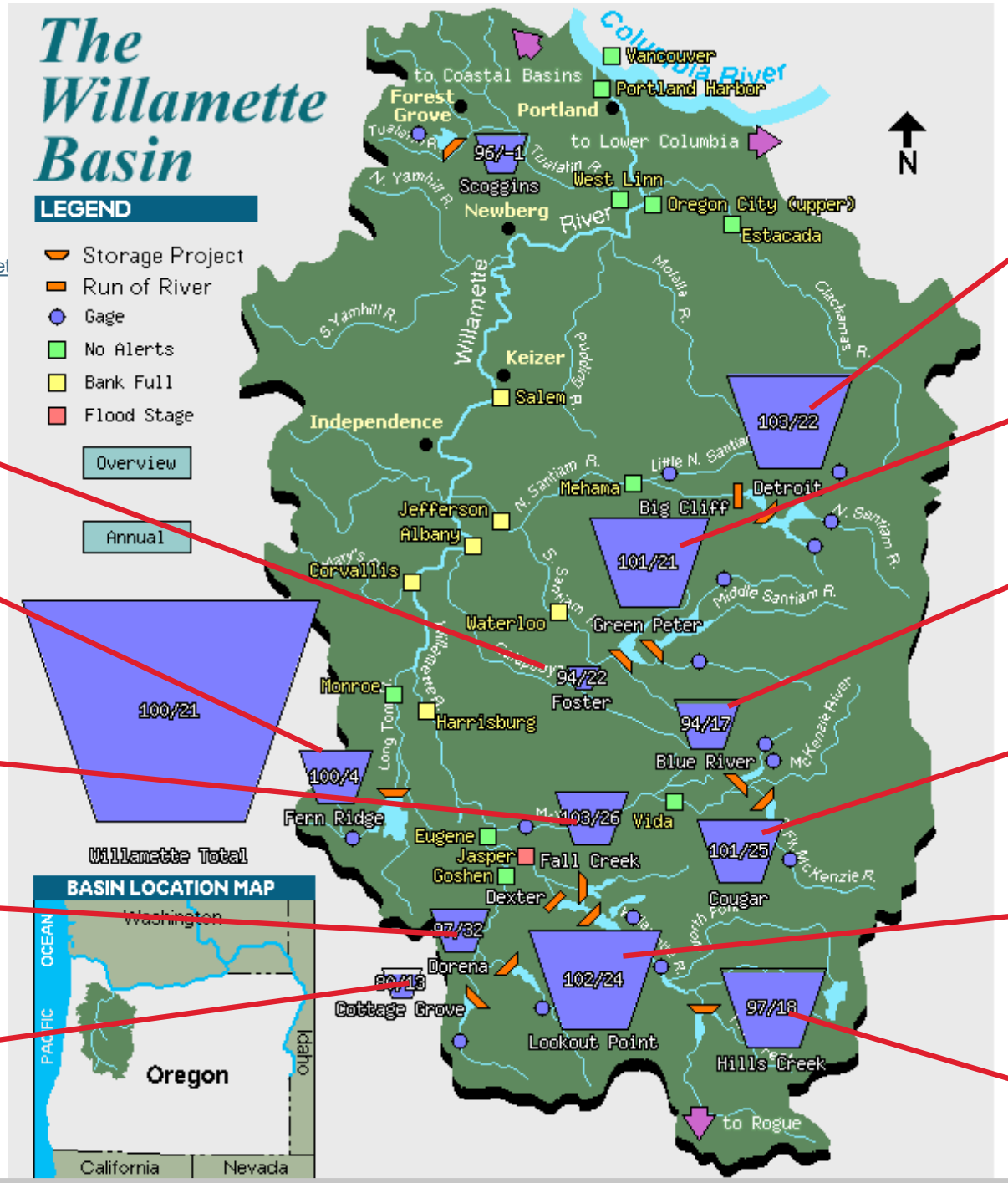

Major Flood Season
Conservation Storage Season
Conservation Use Season
Major Flood Season
Full Pool
Maximum Conservation Pool
Minimum Conservation Pool
Minimum Power Pool
Flood Control Storage
Conservation Storage
Power Storage
Dead & Inactive Storage
Elevation (ft) or storage (af)
Jan
Feb
Mar
Apr
May
Jun
Jul
Aug
Sep
Oct
Nov
Dec
Date

STATUS AS OF
(1430 HRS, 12 APR 2019)

https://nwp-wmlocal2.nwp.usace.army.mil/nwdp/nwp_teacup/www/willamet



Legend –
- 75% – 90%
- 90% – 100%
- > 100%

Foster
ELEV: 635.7 (1300Apr12)
+/-WCD: 5.1 (1300Apr12)
OUT: 21269 (1315Apr12)
IN: 19700 (1300Apr12)

Fern Ridge
ELEV: 373.5 (1230Apr12)
+/-WCD: 0.6 (1230Apr12)
OUT: 2915 (1245Apr12)
IN: 2245 (1230Apr12)

Fall Creek
ELEV: 831.8 (1300Apr12)
+/-WCD: 16.9 (1300Apr12)
OUT: 5590 (1315Apr12)
IN: 5054 (1230Apr12)

Dorena
ELEV: 830.9 (1300Apr12)
+/-WCD: 13.7 (1300Apr12)
OUT: 7314 (1300Apr12)
IN: 6652 (1200Apr12)

Cottage Grove
ELEV: 784.6 (1300Apr12)
+/-WCD: 4.0 (1300Apr12)
OUT: 1599 (1315Apr12)
IN: 1297 (1200Apr12)

Detroit
ELEV: 1566.0 (1300Apr12)
+/-WCD: 19.0 (1300Apr12)
OUT: 5340 (1300Apr12)
IN: 8064 (1100Apr12)

Detroit
ELEV: 1566.0 (1300Apr12)
+/-WCD: 19.0 (1300Apr12)
OUT: 5340 (1300Apr12)
IN: 8064 (1100Apr12)

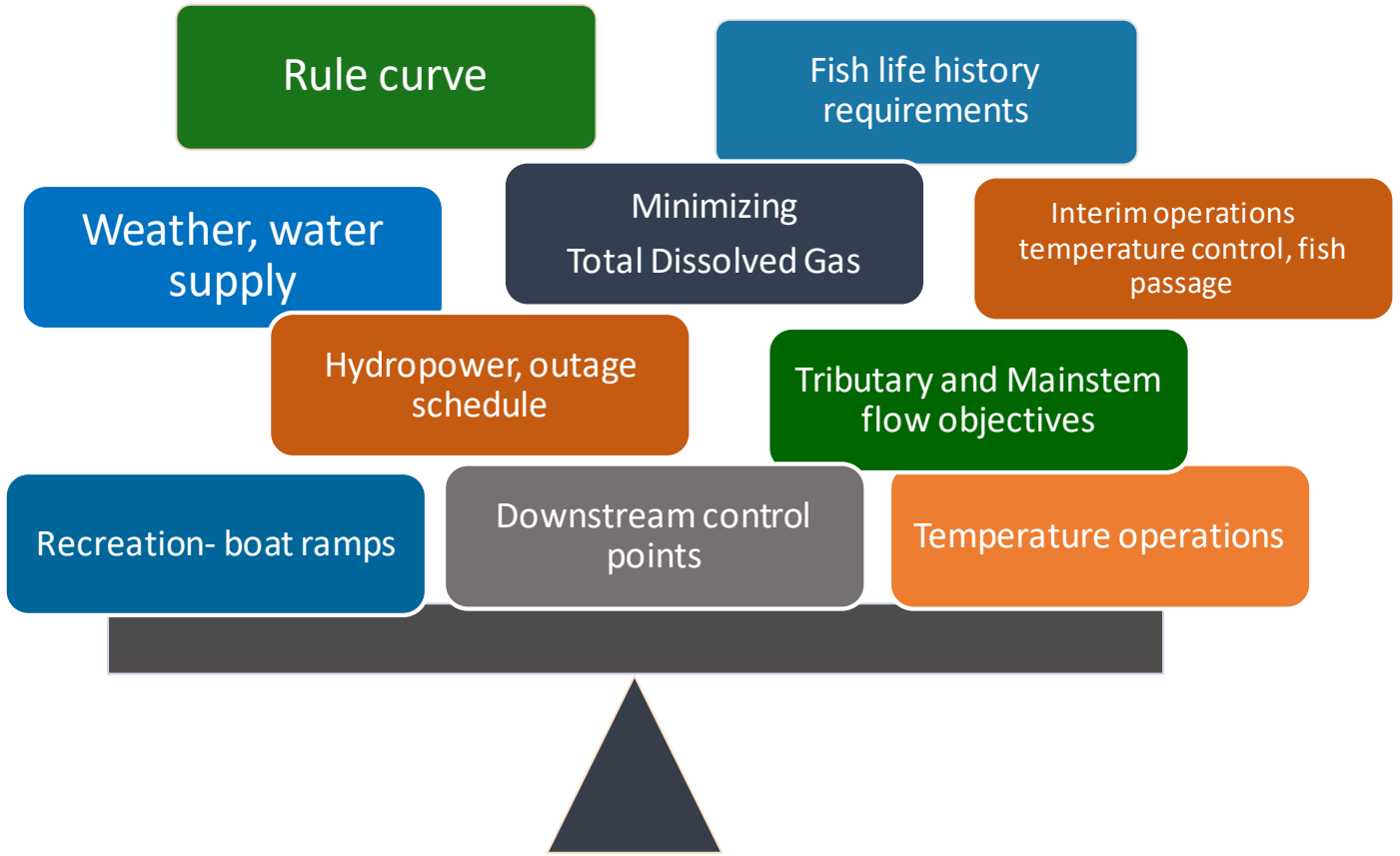
Blue River
ELEV: 1344.9 (1200Apr12)
+/-WCD: 16.2 (1200Apr12)
OUT: 3428 (1245Apr12)
IN: 2431 (1200Apr12)

Cougar
ELEV: 1691.3 (1305Apr12)
+/-WCD: 30.5 (1305Apr12)
OUT: 3820 (1315Apr12)
IN: 4548 (1215Apr12)

Lookout Point
ELEV: 927.7 (1309Apr12)
+/-WCD: 19.5 (1309Apr12)
OUT: 13480 (1200Apr12)
IN: 14394 (1100Apr12)

Hills Creek
ELEV: 1538.8 (1310Apr12)
+/-WCD: 14.0 (1310Apr12)
OUT: 4519 (1320Apr12)
IN: 4857 (1300Apr12)

BALANCING DEMANDS



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ENDANGERED SPECIES ACT OVERVIEW

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ESA- LISTED FISH IN THE WILLAMETTE BASIN

Anadromous Species

National Marine Fisheries Service

Upper Willamette River Spring Chinook salmon

Upper Willamette River winter steelhead

- *Adults spawn in tributaries of Willamette River*
- *Juveniles migrate to ocean for part of their life*
- *Return to same stream where they were born*

Resident Species

U.S. Fish and Wildlife Services

Bull trout

Resident fish spend entire lifecycle in fresh water

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The Willamette Basin

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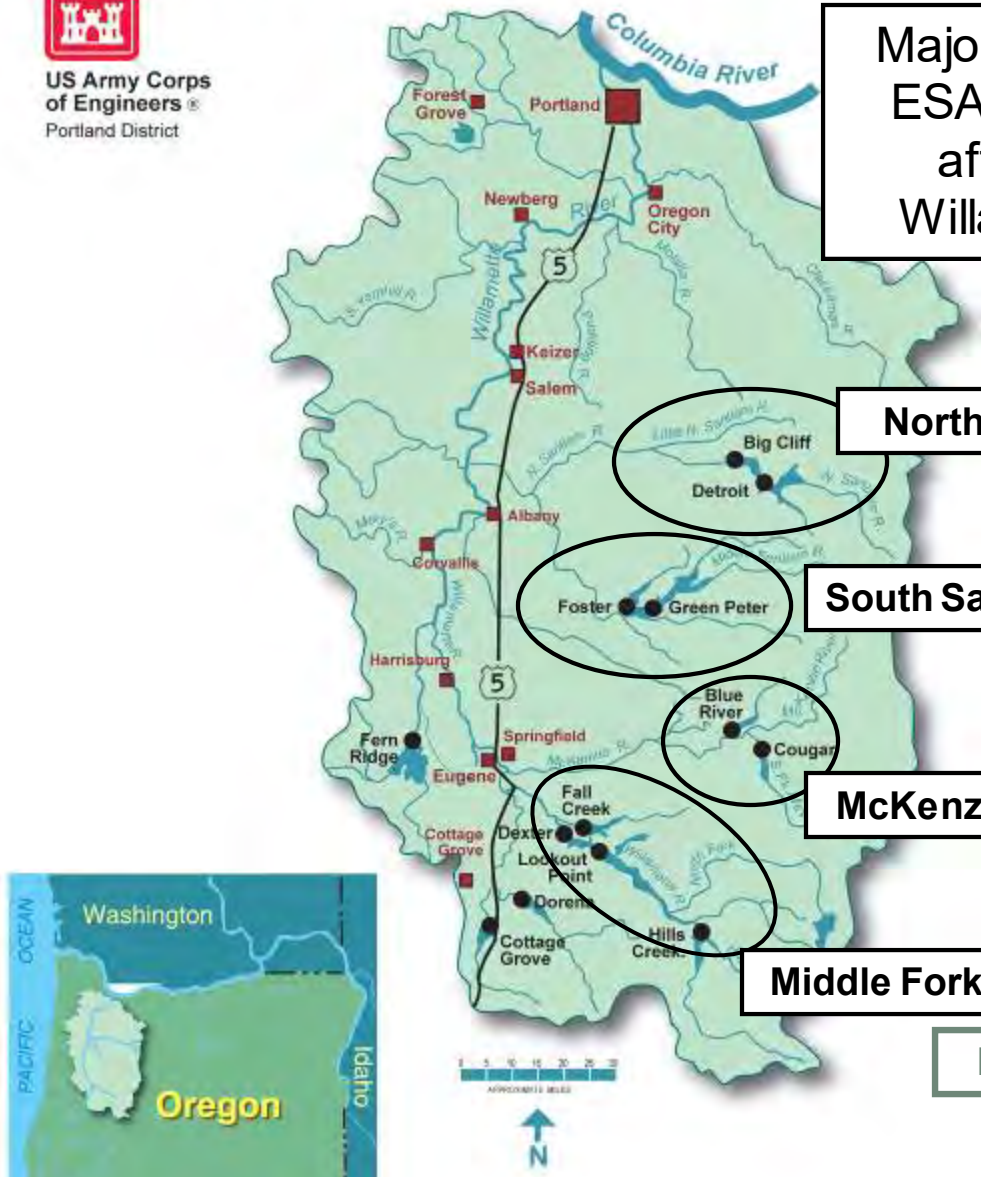
Major populations of ESA-listed species affected by the Willamette Project



North Santiam — Chinook; Steelhead

South Santiam — Chinook; Steelhead

McKenzie — Chinook; Bull trout

Middle Fork — Chinook; Bull trout

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PRIMARY EFFECTS OF WILLAMETTE PROJECT ON FISH

Habitat isolation/disconnectivity

–Dams blocked access to spawning habitat (i.e., no fish passage)

- In some basins 90% of spawning habitat upstream of dams

Effects on remaining spawning and rearing habitat located downstream of dams

–flow availability and physical habitat

–hatchery fish interacting with wild fish

–Water quality (temperature, dissolved gas)

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WILLAMETTE PROJECT BIOLOGICAL OPINIONS: HISTORY OF CONSULTATION UNDER THE ESA

Federal Action Agencies prepare Biological Assessments (BA) describing effects of actions on ESA-listed fish

NMFS and USFWS issue Biological Opinions ("BiOps") that tell Action Agencies how to reduce impacts

Two biological opinions (NMFS and USFWS) issued on July 11, 2008

– **2008 Biological Opinions cover through 2023**

ESA coverage will be updated as part of this BiOp

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FISH PASSAGE AND FLOW MANAGEMENT IMPROVEMENTS

Adult Fish Collection Facilities improvements: Cougar, Detroit, Foster, and Fall Creek Dams
Juvenile Fish Passage improved: spill at Foster and Fall Creek dams
Flow management: ramping rates, minimum flow targets, temperature operations
Hatchery reforms and Hatchery Genetic Management Plans (HGMPs)

Minto Adult Fish Collection Facility - 2013

Foster Spill Weir for downstream fish passage - 2018

Operations to improve downstream flows and water quality - 2000

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ENVIRONMENTAL IMPACT STATEMENT OVERVIEW

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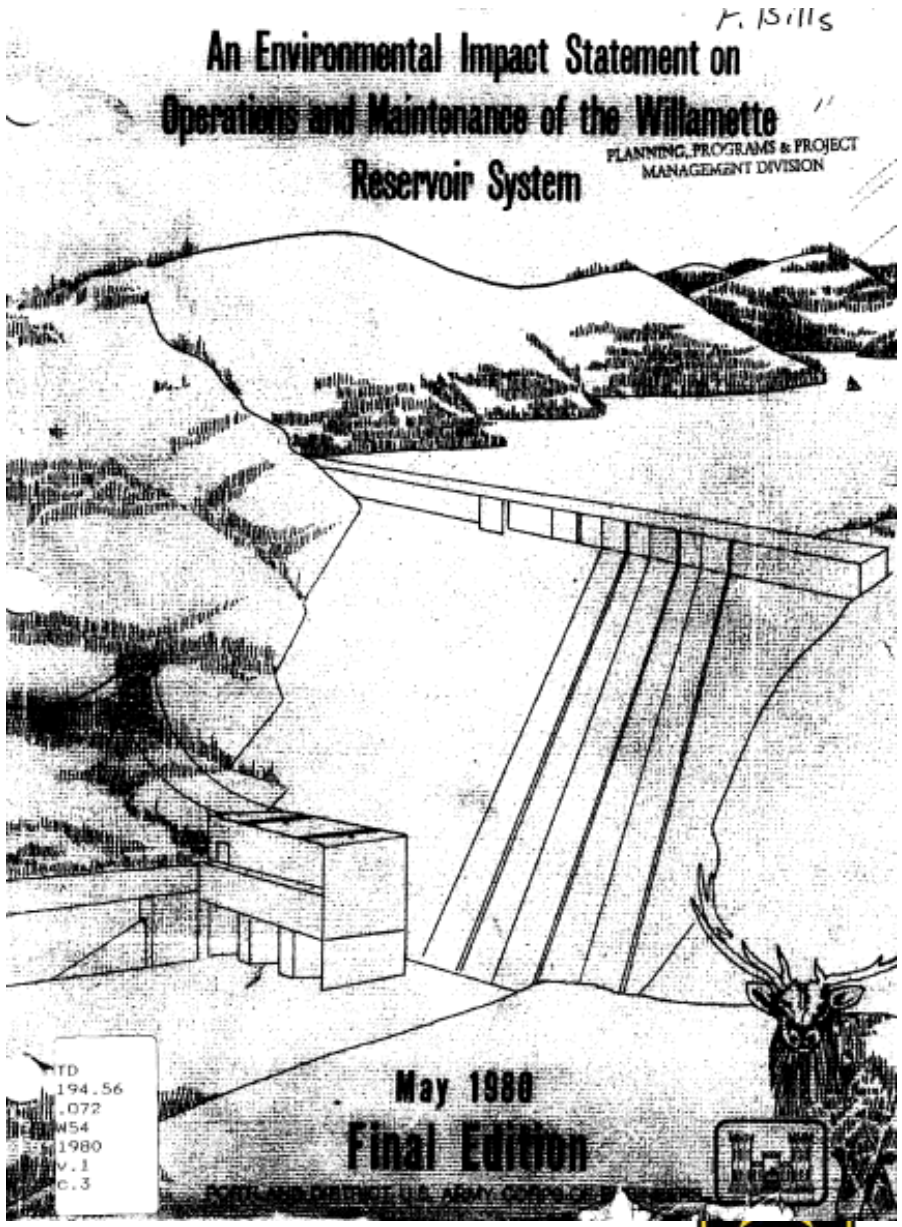
WHY IS THE CORPS PREPARING AN ENVIRONMENTAL IMPACT STATEMENT ?

System-wide evaluation of environmental impacts from operation and maintenance was last conducted in 1980. Since 1980:

- Operations have been modified and structural improvements have been made.
- New information available on the environmental impacts of operating and maintaining the system
- Large amount of new information gained regarding Endangered Species Act (ESA) listed species since the 2008 biological opinion, primarily obtained from the research, monitoring, and evaluation (RM&E) program that the Corps has implemented.



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PURPOSE AND NEED

“The purpose and need is continued operations and maintenance of the Willamette Valley System (WVS) in accordance with authorized project purposes; while meeting Endangered Species Act (ESA) obligations to avoid jeopardizing the continued existence of listed species."

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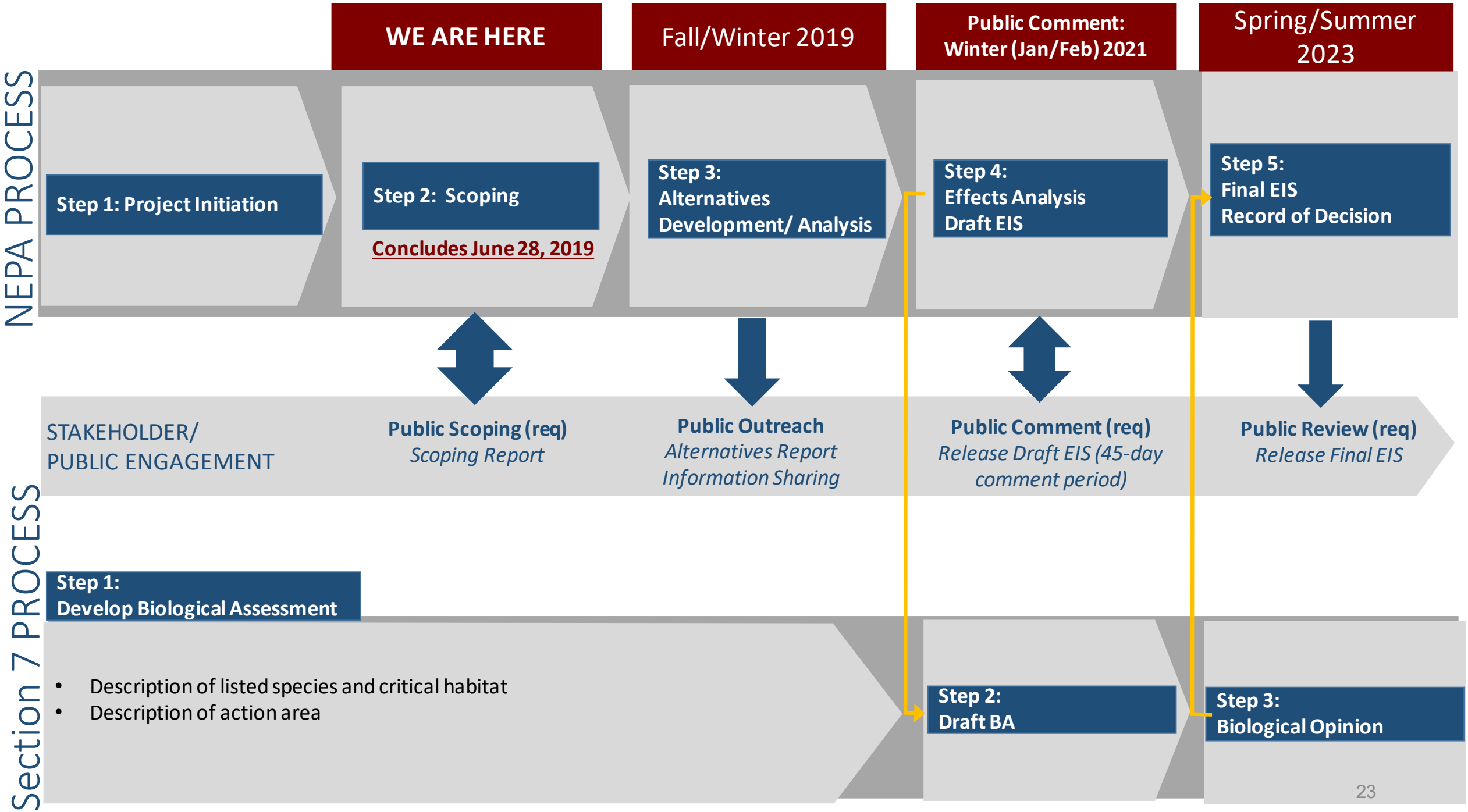
WE ARE HERE
Fall/Winter 2019
Public Comment: Winter (Jan/Feb) 2021
Spring/Summer 2023
NEPA PROCESS
Step 1: Project Initiation
Step 2: Scoping
Concludes June 28, 2019
Step 3: Alternatives Development/ Analysis
Step 4: Effects Analysis Draft EIS
Step 5: Final EIS Record of Decision
STAKEHOLDER/ PUBLIC ENGAGEMENT
Public Scoping (req)
Scoping Report
Public Outreach
Alternatives Report
Information Sharing
Public Comment (req)
Release Draft EIS (45-day comment period)
Public Review (req)
Release Final EIS
Section 7 PROCESS
Step 1: Develop Biological Assessment
• Description of listed species and critical habitat
• Description of action area
Step 2: Draft BA
Step 3: Biological Opinion

HOW DOES THIS EIS RELATE TO OTHER ONGOING CORPS ACTIONS IN THE WILLAMETTE VALLEY?

The Corps has a few proposed actions that are currently under review in the NEPA process:

- Willamette Basin Review Feasibility Study and Environmental Assessment, evaluating reallocation of conservation storage
- Cougar Downstream Passage Environmental Assessment
- Detroit Downstream Passage and Temperature Control Environmental Impact Statement

- These proposed actions will continue to move forward on their current timeline
- May be included in the “no action” alternative in the WVS EIS.

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HOW TO COMMENT

At a scoping meeting, like today

- Map Your Comment
- Comment Brochure

Email: willamette.eis@usace.army.mil

Mail: U.S. Army Corps of Engineers, CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946

Public Comment Portal (geographic based online comment tool). Link on project website:

https://www.nwp.usace.army.mil/Locations/Willamette-Valley/Evaluation/

Comment Period Ends June 28, 2019

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PUBLIC COMMENT PORTAL

Related Links

Willamette Valley
Biological Opinions (BiOp)

External Links

Federal Register Notice of Intent
Endangered Species Act
National Marine Fisheries Service
Citizen's Guide to NEPA

Submit comment:

U.S. Army Corps of Engineers,
CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946

Public Comment Portal
(Optimized for Firefox)

willamette.eis@usace.army.mil

E-mail if you would like to be added to our distribution list for updates.

Comments are due by June 28, 2019.

Willamette Valley System Environmental Impact Statement

The Portland District, U.S. Army Corps of Engineers intends to prepare an Environmental Impact Statement to address the continued operations and maintenance of the Willamette Valley System in accordance with authorized project purposes; while meeting Endangered Species Act obligations to avoid jeopardizing the continued existence of listed species.

The Corps will serve as the lead federal agency for purposes of the National Environmental Policy Act. Read an article about the project here.

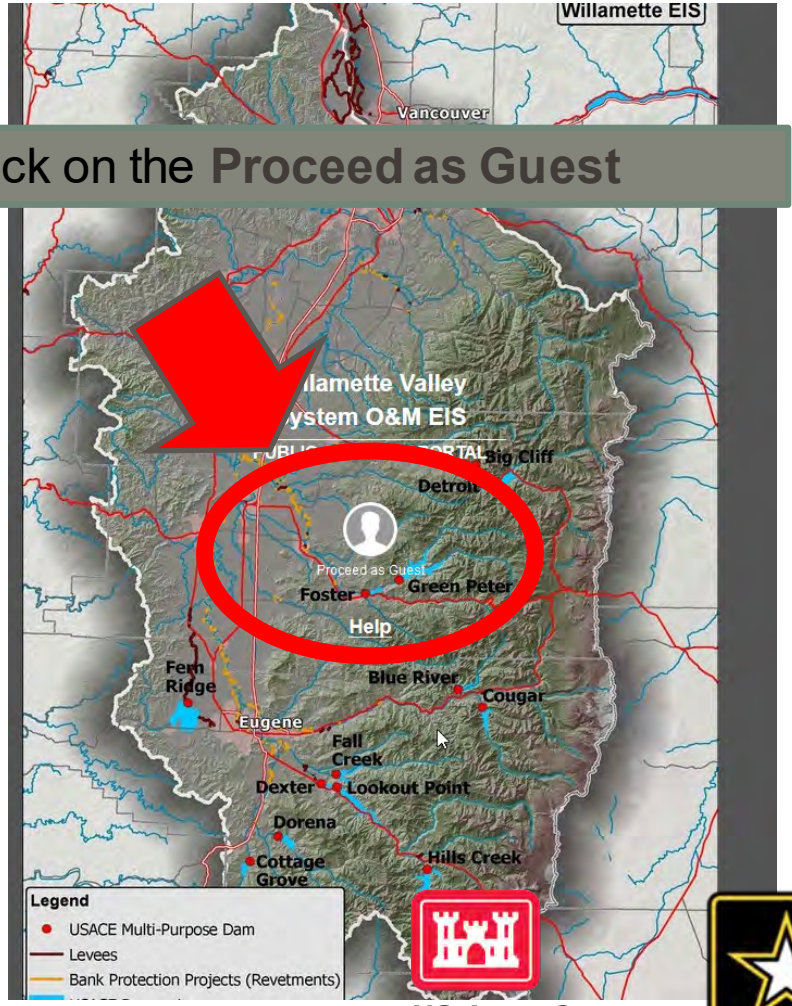
Click on the **PUBLIC COMMENT PORTAL** link on the project website

Cottage Grove Dam and Reservoir sits on the Coast Fork of the Willamette River, south of Eugene, Oregon. Cottage Grove is one 13 dams and reservoirs in the Willamette Valley System and the Corps' continued operations and maintenance of the facility will be evaluated in the system-wide Environmental Impact Statement slated to kick-off this spring.

Background

The Corps operates and maintains 13 multipurpose dams and reservoirs in the Willamette River Basin in Oregon, and hatchery programs.

Click on the **Proceed as Guest**



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Portland District

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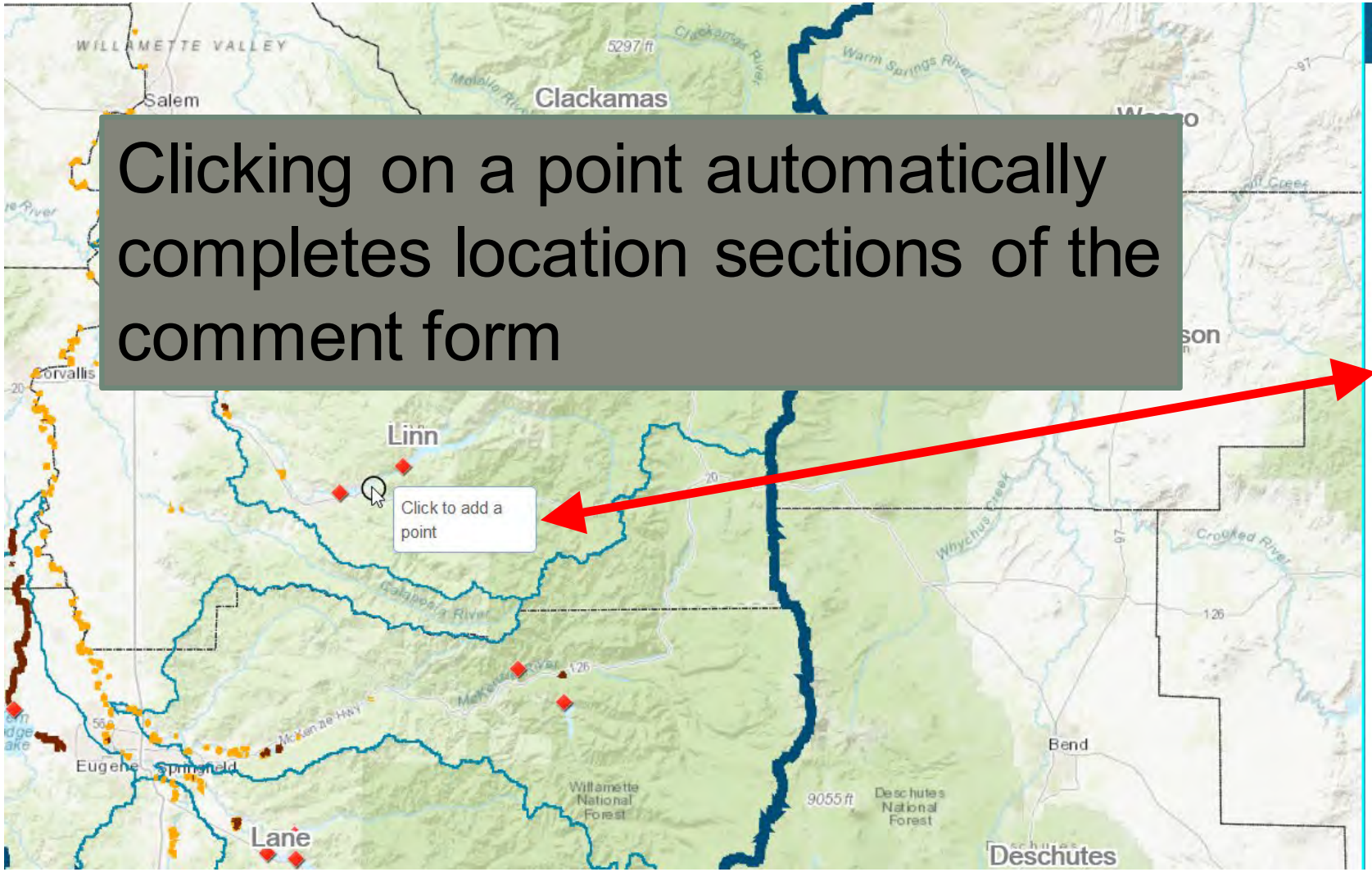
PUBLIC COMMENT PORTAL



Clicking on a point automatically completes location sections of the comment form

Comments

COMMENTS

Comment Name (required)

Give your comment a name

Location for Comment (required)

General geographic location for your comment

44800-44898 Old Hufford Dr, Foster, Oregon, 97345

Project Purpose (required)

Choose the Corps' Project Purpose for your comment

Select...

Organization

If affiliated with an organization

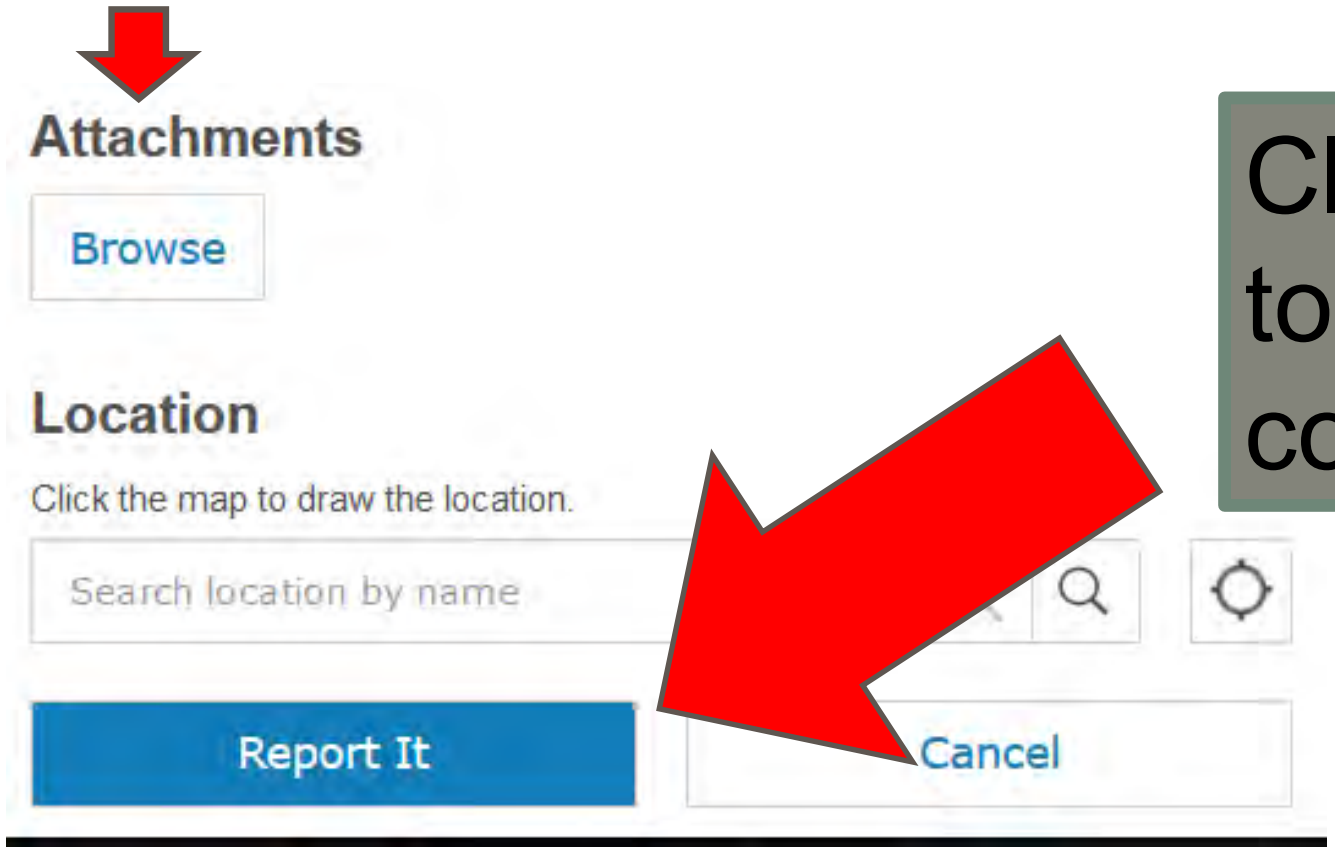
Name (Will Not Be Publicly Viewable)

Your name

Portland District

PUBLIC COMMENT PORTAL

You may add attachment, photos, studies, etc….



Click “Report It” to submit your comment

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FOR MORE INFORMATION

EIS Website: https://www.nwp.usace.army.mil/Locations/Willamette-Valley/Evaluation/

Willamette Valley Website: https://www.nwp.usace.army.mil/Locations/Willamette-Valley/

About the Corps (Portland District web site): www.nwp.usace.army.mil

Portland District Water Management Reservoir Regulation and Water Quality Section http://www.nwd-wc.usace.army.mil/nwp/wm/

Videos of the Willamette system: http://www.youtube.com/user/PortlandCorps

Water Data (DBQuery): http://www.nwd-wc.usace.army.mil/dd/common/dataquery/www/

River Flow (real time and forecasted)
water.weather.gov and https://www.nwrfc.noaa.gov/rfc/

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Thank You!

Please visit the stations to learn about:

NEPA Process

Alternatives Development

System Operations

Endangered Species Act Consultation

US Army Corps of Engineers ®

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HOW TO COMMENT

At a scoping meeting, like today

- Map Your Comment
- Comment Brochure

Email: willamette.eis@usace.army.mil

Mail: U.S. Army Corps of Engineers, CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946

Public Comment Portal (geographic based online comment tool). Link on project website:

https://www.nwp.usace.army.mil/Locations/Willamette-Valley/Evaluation/

Comment Period Ends June 28, 2019

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Attachment F: Public Comment Brochure

Name (First, Last)

Organization

City, State

Email

☐ Please check if you would like to receive email notifications about this project.

Comment. Please use this space to provide comments to the Corps.

PUBLIC COMMENT PERIOD CLOSING DATE: JUNE 28, 2019

US Army Corps of Engineers®
Portland District

The Willamette Valley System Operations and Maintenance Environmental Impact Statement (EIS)

Public Comment Brochure

PUBLIC COMMENT PERIOD CLOSING DATE: JUNE 28, 2019

The Portland District, U.S. Army Corps of Engineers intends to prepare an Environmental Impact Statement to address the **continued operations and maintenance of the Willamette Valley System** in accordance with authorized project purposes; while meeting Endangered Species Act obligations to avoid jeopardizing the continued existence of listed species.

Visit the project website to find the link to submit a comment through the **Public Comment Portal**. You can also submit a comment by filling out this **brochure**, or by sending your comment via **mail** or **e-mail**.

Where We Are in the NEPA Process

Scoping Public Comment Period

Scoping is the earliest opportunity for the public to provide input regarding the "scope" of the issues to be evaluated in the EIS. The Corps is seeking input on:

- How does the system impact you?
- What challenges do you see with system operations?
- What opportunities/solutions are there for improvement?
- What resources are you concerned about, natural, cultural, socioeconomic…?

Please use this brochure to provide your input. Other ways to comment are:

Email

willamette.eis@usace.army.mil

Public Comment Portal

located on the project website at:
https://www.nwp.usace.army.mil/Locations/Willamette-Valley/System-Evaluation-EIS/

Mail

U.S. Army Corps of Engineers,
CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946

What Are You Interested in?

Is your comment about a:

☐ Challenge/Issue

☐ Opportunity/Solution

☐ Resource *(e.g. water quality, biological resource, economic, socioeconomic?)*

☐ Other

Please choose the Corps' project purpose(s) that is the closest fit for the topic of your comment.

Project Purpose:

☐ Flood Risk Management

☐ Fish and Wildlife

☐ Water Supply (Irrigation)

☐ Water Supply (M&I)

☐ Hydropower

☐ Water Quality

☐ Recreation

☐ Navigation

Questions to Consider When Filling Out the Comment Form

If your comment is about a *Challenge or Issue*, please consider the following questions:

- Please provide a description of the challenge/issue.
- How does this issue/challenge affect you or resources that you care about?
- Are the specific details or information about the challenge that you would like share with the Corps?
- What suggestions might you have for the Corps to address the challenge/issue?
- Other comments on the challenge or issue?
- Are there studies/data/resources that you can share with the Corps regarding your challenge/issue? *If so, please list or attach.*

If your comment about an *Opportunity or Solution* for the Corps, please consider the following questions:

- What issue or challenge would your proposed opportunity/solution address?
- Please provide a general description of your proposed solution.
- Does the proposed solution involve an operational change? *Please Describe.*
- Does the proposed solution involve or a structural change? *Please Describe.*
- Describe how to implement your proposed solution. *Include information about, timing, frequency, and duration.*
- Other comments on the purpose of the proposed solution and/or its intended benefits?
- Are there studies/data/resources that you can share with the Corps regarding your proposed solution? *If so, please list or attach.*

If your comment is about a *Resource* that should be considered in the EIS, please consider the questions below:

- Provide a general description of the resource.
- What are your concerns related to the resource?
- Where does the resource occur? Basin-wide? Or specific location(s), please list?
- What information should the Corps be aware of related to this resource?
- Other comments regarding the resource?
- Are there studies/data/resources that you can share with the Corps regarding the resource? *If so, please list.*

Attachment G: Public Scoping Meeting Handout on Using the Public Comment Portal

Using the Public Comment Portal
Step 1: Click on the link on the project website

https://www.nwp.usace.army.mil/Locations/Willamette-Valley/System-Evaluation-EIS/

Willamette Valley System Environmental Impact Statement

Related Links

Willamette Valley Biological Opinions (BiOp)

External Links

Federal Register Notice of Intent
Endangered Species Act
National Marine Fisheries
Citizen's Guide to NEPA

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Submit comment:

U.S. Army Corps of ers,
CENWP-PME-E
ATTN: Suzanne
P.O. Box 2946
Portland, OR 97208-294

Public Comment Portal
(Optimized for Firefox)

ace.army.mil

E-mail us if you would like to be added to our distribution list for updates.

Comments are due by June 28, 2019.

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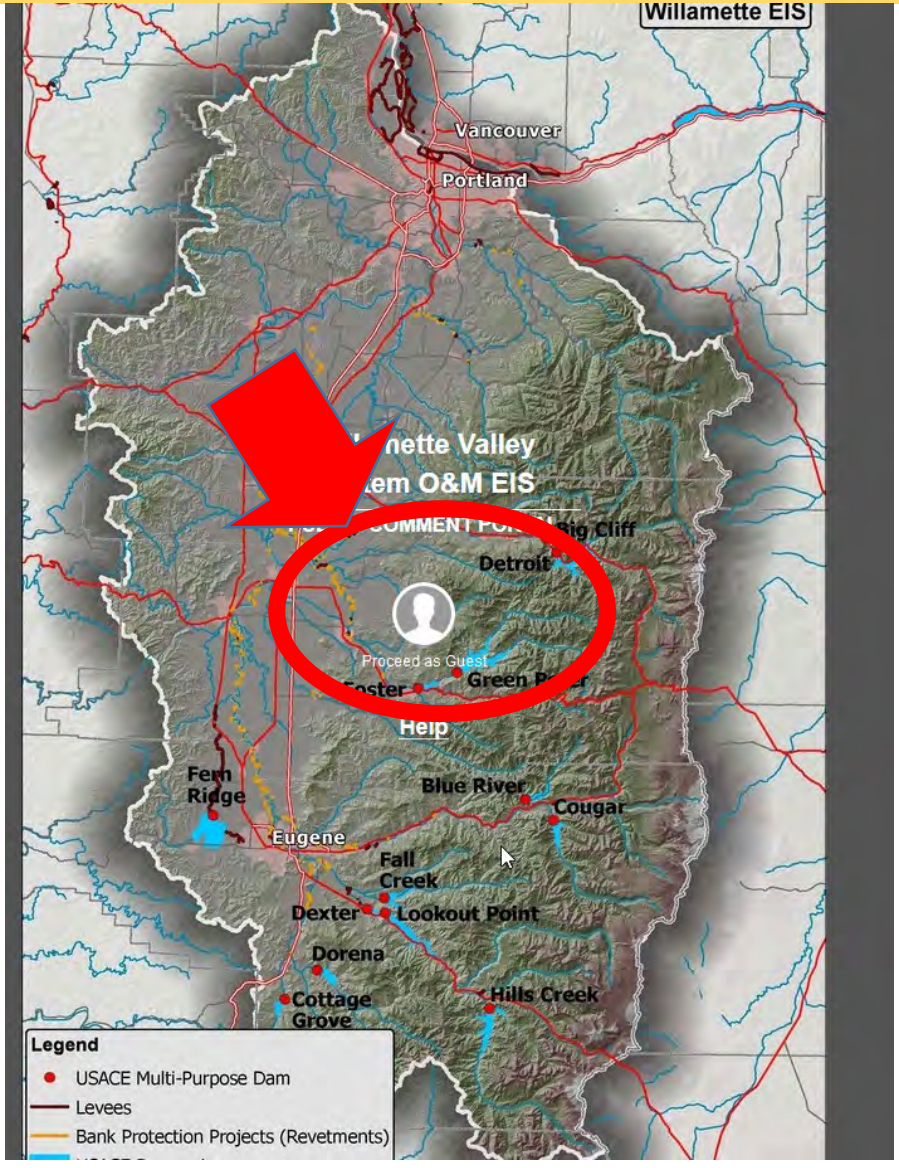
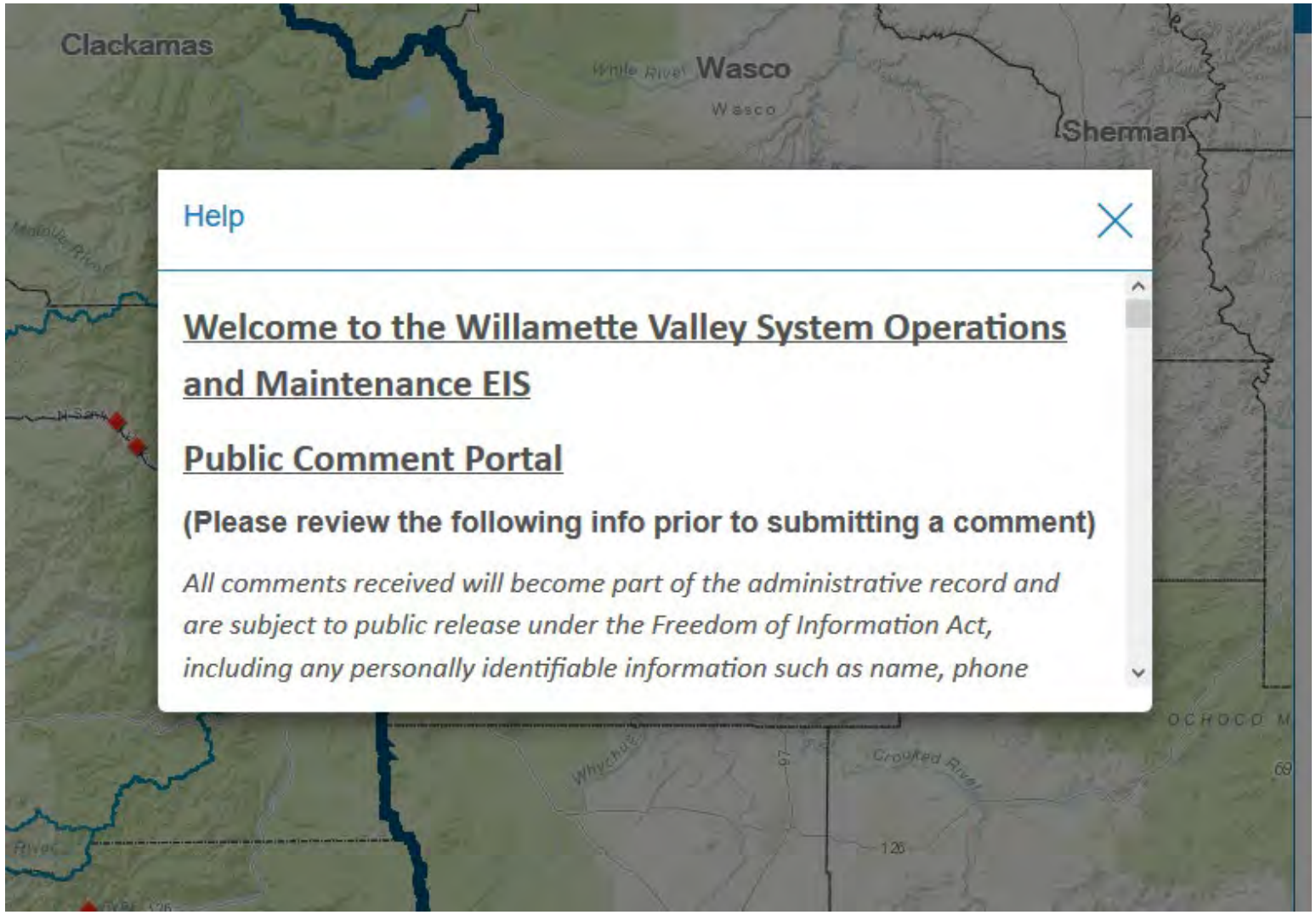
Background

The Corps operates and maintains 13 multipurpose dams and reservoirs in the Willamette River Basin in Oregon, and hatchery programs.

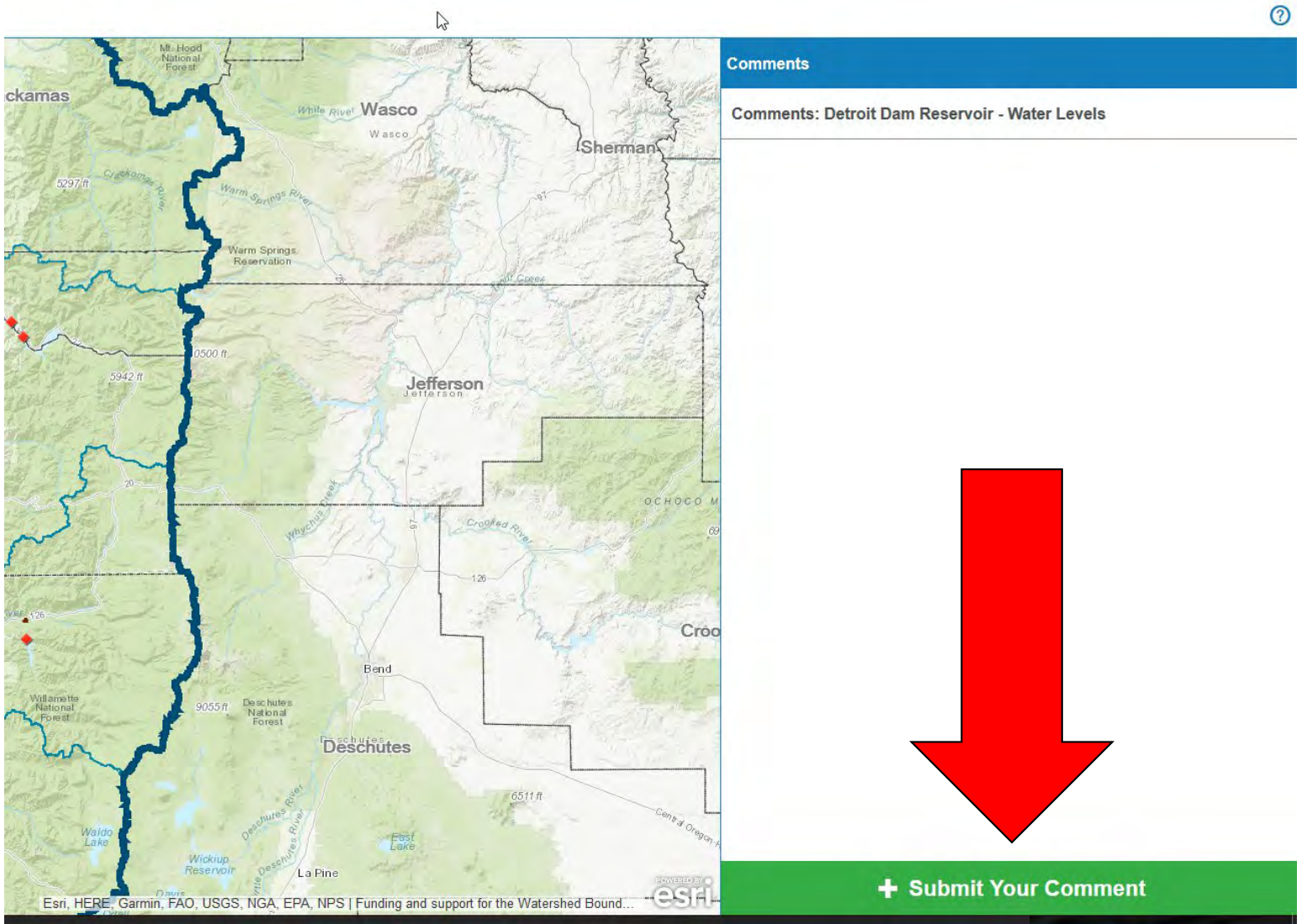
Using the Public Comment Portal
Step 2: Click on “Proceed as Guest”



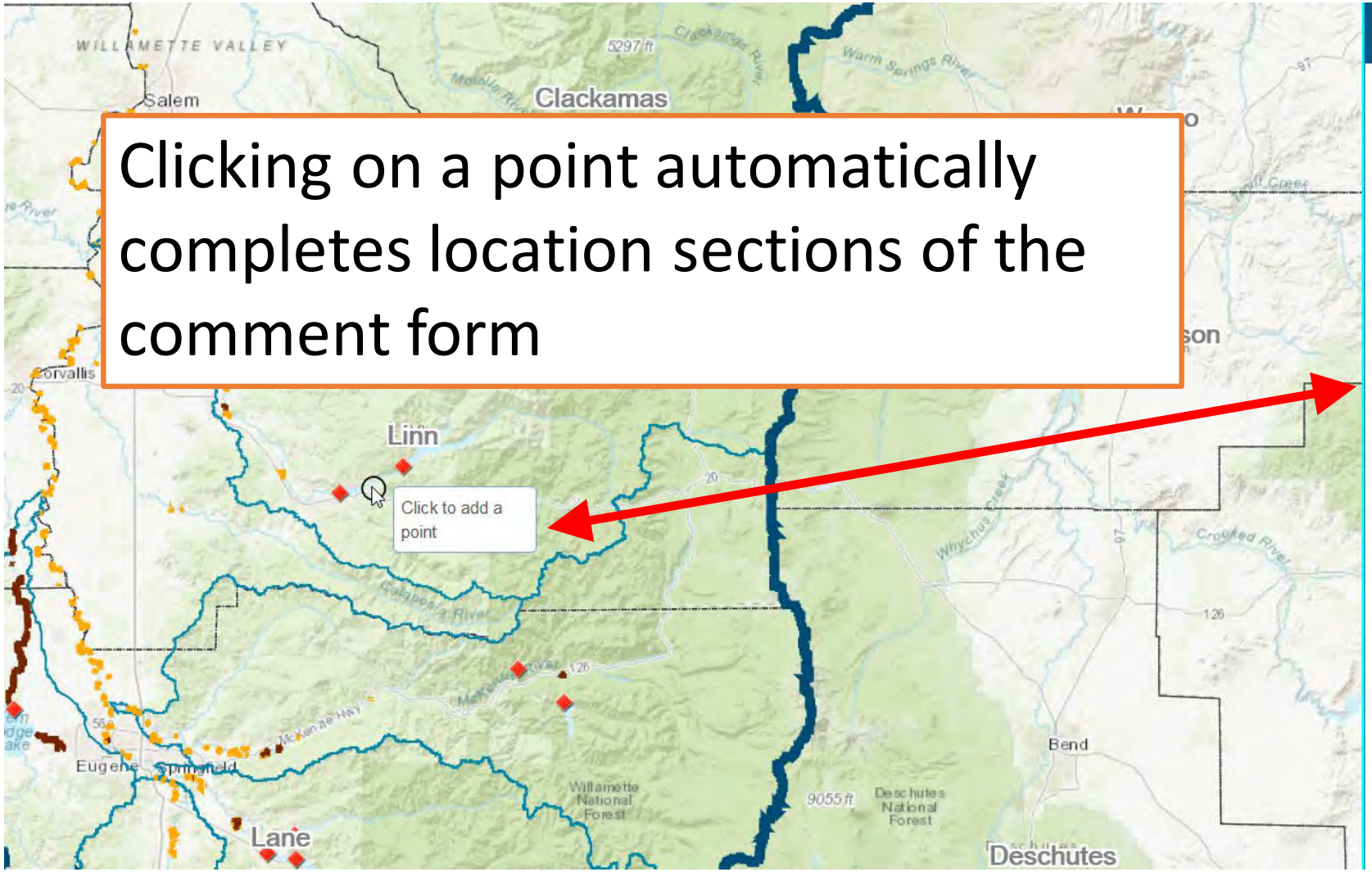
Using the Public Comment Portal
Step 3: Review the information in the Help Box



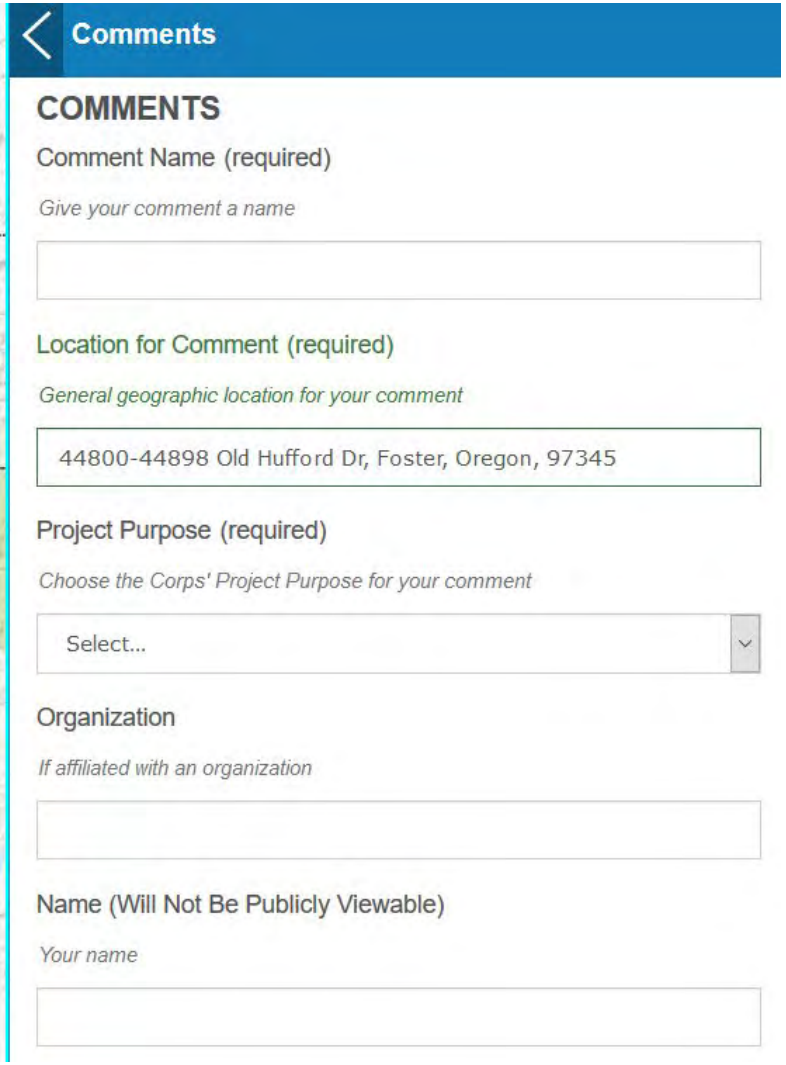
Using the Public Comment Portal
Step 4:Click on Submit Your Comment



Using the Public Comment Portal
Step 5:Complete the Form

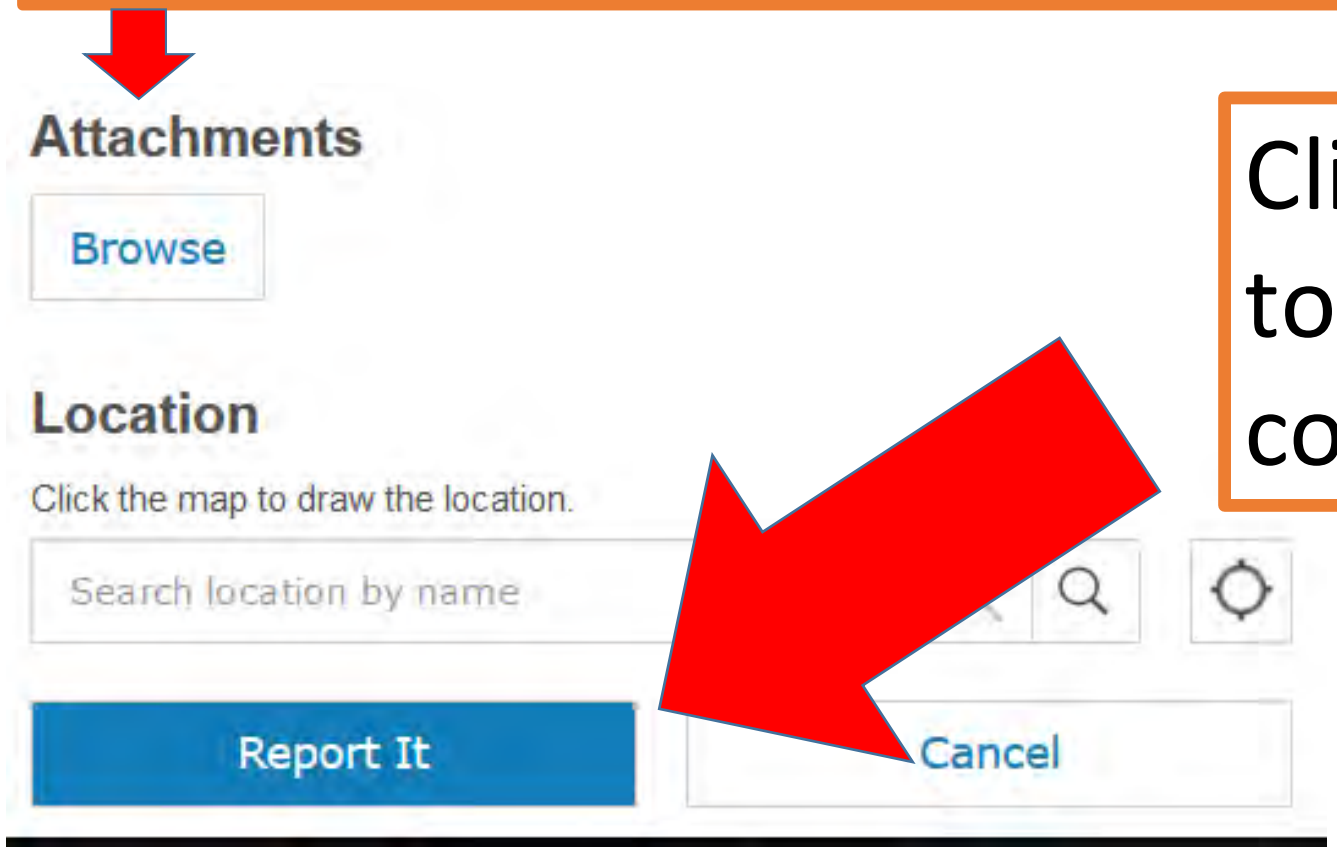


Clicking on a point automatically completes location sections of the comment form



Using the Public Comment Portal
Step 5:Complete the Form

You may add attachment, photos, studies, etc....



Click “Report It” to submit your comment

Attachment H: Scoping Informational Brochure

US Army Corps of Engineers®
Portland District

Willamette Valley System Operations and Maintenance Environmental Impact Statement (EIS)

Scoping Informational Brochure

June 2019

National Environmental Policy Act (NEPA) Overview

The Corps is initiating the preparation of an Environmental Impact Statement (EIS) to address the continued operations and maintenance of the Willamette Valley System (WVS). The WVS consists of 13 multipurpose dams and reservoirs, riverbank protection projects, and hatchery programs in the Willamette River Basin in Oregon.

The EIS will be prepared in accordance with the National Environmental Policy Act (NEPA). NEPA requires federal agencies to prepare an EIS for any major federal action that may significantly affect the human environment. The most recent system-wide evaluation for the operations and maintenance of the WVS was an EIS completed in 1980. Since 1980:

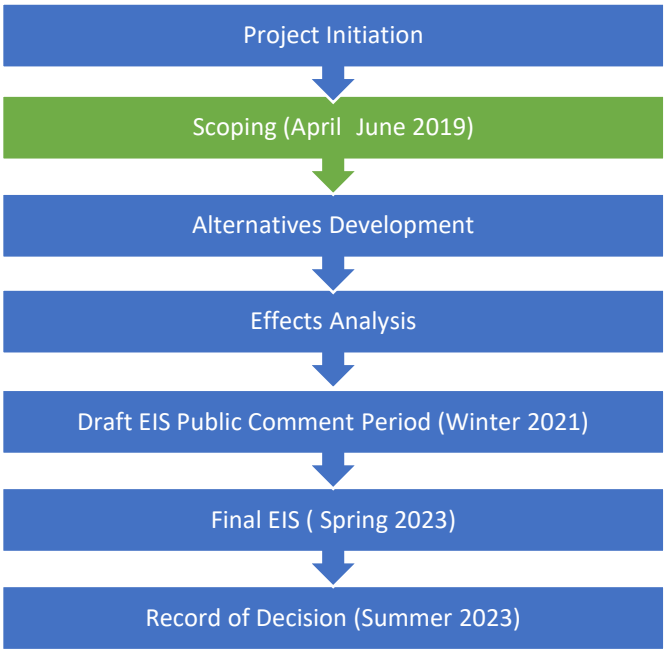
- Operations have been modified and structural improvements for fish passage and temperature control have been implemented to address effects of the WVS on Endangered Species Act (ESA) listed species.
- There is new information relevant to the environmental impacts of operating the WVS, specifically information related to impacts to ESA-listed species.

We are Here: Scoping

Scoping is the earliest opportunity for the public to provide input regarding the "scope" of the issues to be evaluated in the EIS. The Corps is seeking input on:

- How does the system impact you?
- What challenges do you see with system operations?
- What opportunities/solutions are there for improvement?
- What resources are you concerned about: natural, cultural, socioeconomic…?

Comments received during scoping will help the Corps focus the scope of issues evaluated in the EIS and define/refine action alternatives to be evaluated in the EIS. Attachment 1 is a figure that describes how the Corps will make decisions regarding the scope of this EIS.



Public Comment Period Closes June 28, 2019

Purpose and Need for the Proposed Action

The purpose and need is continued operations and maintenance of the Willamette Valley System (WVS) in accordance with authorized project purposes; while meeting Endangered Species Act (ESA) obligations to avoid jeopardizing the continued existence of listed species.

TABLE 1. AUTHORIZED PROJECT PURPOSES

Dam & Reservoir	Detroit	Big Cliff	Green Peter	Foster	Cougar	Blue River	Hills Creek	Lookout Point	Dexter	Fall Creek	Dorena	Cottage Grove	Fern Ridge
Flood Control	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓	✓
Irrigation	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓	✓
Navigation	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓	✓
Hydropower	✓	✓	✓	✓	✓	✓	✓	✓	✓				
Fish & Wildlife	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓	✓
Water Quality	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓	✓
Recreation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Water Supply	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Alternatives

As part of the NEPA process, the Corps will be developing alternatives that meet the purpose and need for the proposed action. Components of the proposed action and alternatives may include:

- Dam and reservoir operations and maintenance
- Water control manual updates
- Refinement and implementation of 2015 Configuration/Operation Plan (COP) recommendations. The COP is an alternatives study for implementation of the 2008 Biological Opinion.
- Hatchery program commensurate with fish passage conditions and to address effects on ESA-listed species.

NEPA requires that a no action alternative be evaluated in the EIS. For this EIS, "no action" is represented by "no change" from current management direction or level of management intensity. Within the Willamette Valley System, the Corps has a few proposed actions that are currently under review in the NEPA process:

- Willamette Basin Review Feasibility Study and Environmental Assessment, evaluating reallocation of conservation storage
- Cougar Downstream Passage Environmental Assessment

- Detroit Downstream Passage and Temperature Control Environmental Impact Statement

It is anticipated that the Corps will have completed review under NEPA for these actions at the writing of the draft EIS, in which case these proposed actions would represent the no action alternative. Attachment 1 is a figure that describes how the Corps will make decisions regarding what activities will be included in the scope of this EIS.

Cooperating Agencies

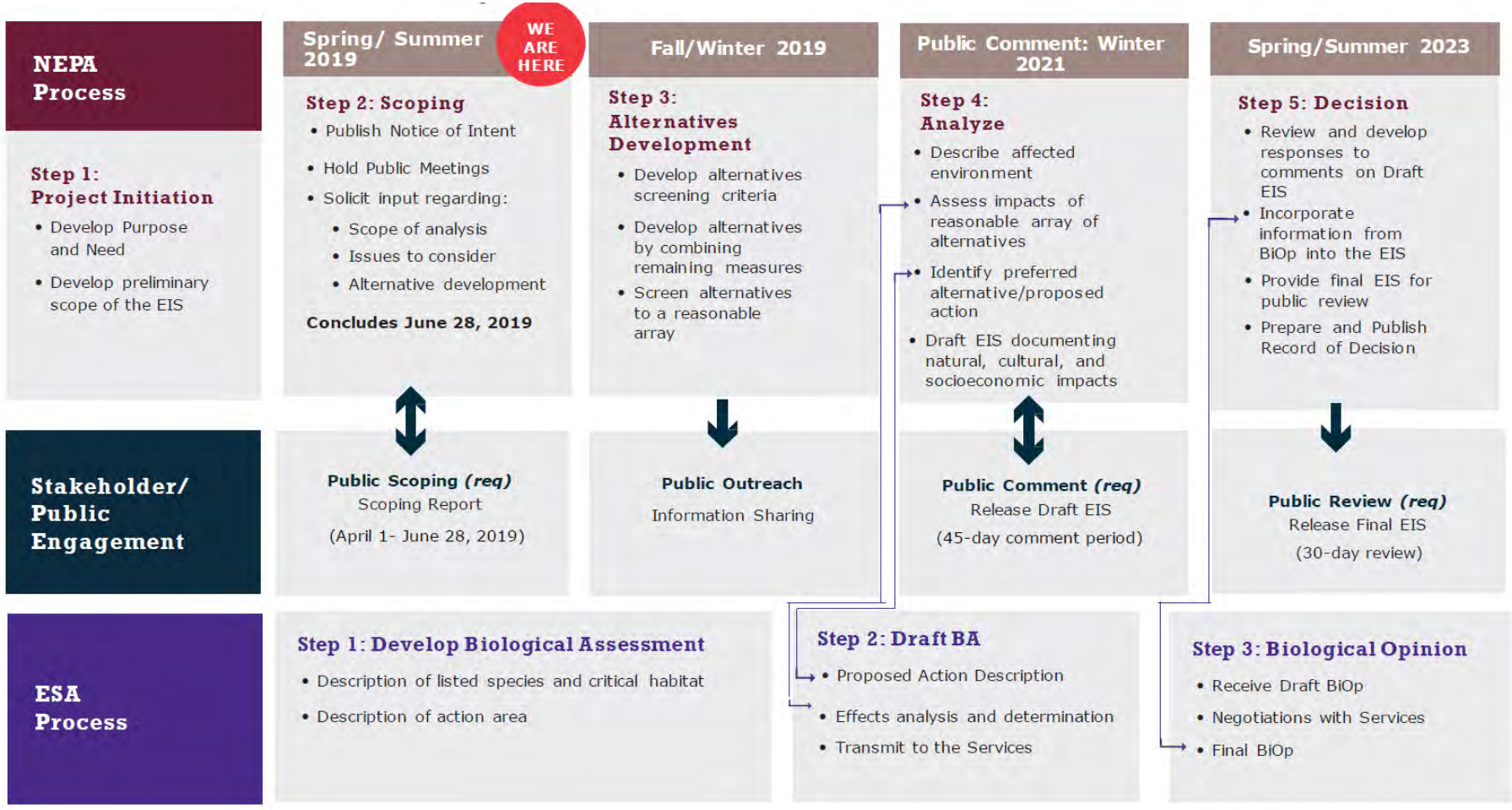
The Corps has invited Tribal, Federal, and State agencies to participate as cooperating agencies in the preparation of the EIS. Agencies are invited to participate because they have special expertise with respect to an environmental issue, and/or they have jurisdiction by law. The following tribes, federal and state agencies have accepted the Corps' invitation to participate as a cooperating agency:

- Confederated Tribes of the Grand Ronde
- National Marine Fisheries Service
- U.S. Fish and Wildlife Service
- Bureau of Reclamation
- Bonneville Power Administration
- Oregon Department of Fish and Wildlife
- Oregon Department of Agriculture
- Oregon Department of Environmental Quality
- Oregon Water Resources Department

NEPA and ESA Consultation Process

The Corps will be integrating the NEPA process and the ESA consultation processes, which will provide multiple opportunities for public input on the proposed action through the NEPA process.

FIGURE 1. NEPA AND ESA PROCESS



Willamette Valley System

The Willamette Valley System is comprised of thirteen (13) multipurpose dams and reservoirs, riverbank protection projects in the Oregon's Willamette River Basin, and hatchery programs. Each individual dam plays a specific role in synchronized water management system that provides flood risk management, hydropower generation, irrigation, navigation, recreation, fish and wildlife, water supply, and water quality on the Willamette River Basin and many of its tributaries as far north as Portland, Oregon. Authorized project purposes of each of the multipurpose dams are provided in Table 1.

Water Control Diagram

The Corps developed a water control diagram for the operation of each dam and reservoir. The water control diagram is a water year based depiction of the authorized or allocated space in the reservoir and a multi-purpose rule curve that balances flood risk management with conservations needs. The diagram includes specific elevation levels such as maximum pool, full pool, and the flood pool levels, filling rates to reach maximum conservation pool, and fall draft rates to meet the winter flood pool. Storage components are identified, such as power pools, conservation pool, flood storage, exclusive summer flood storage. It also specifies primary and secondary flood pools where applicable.

The water control diagram and the associated operational goals, limitations and requirements are outlined in the individual dams' **water control manuals**.

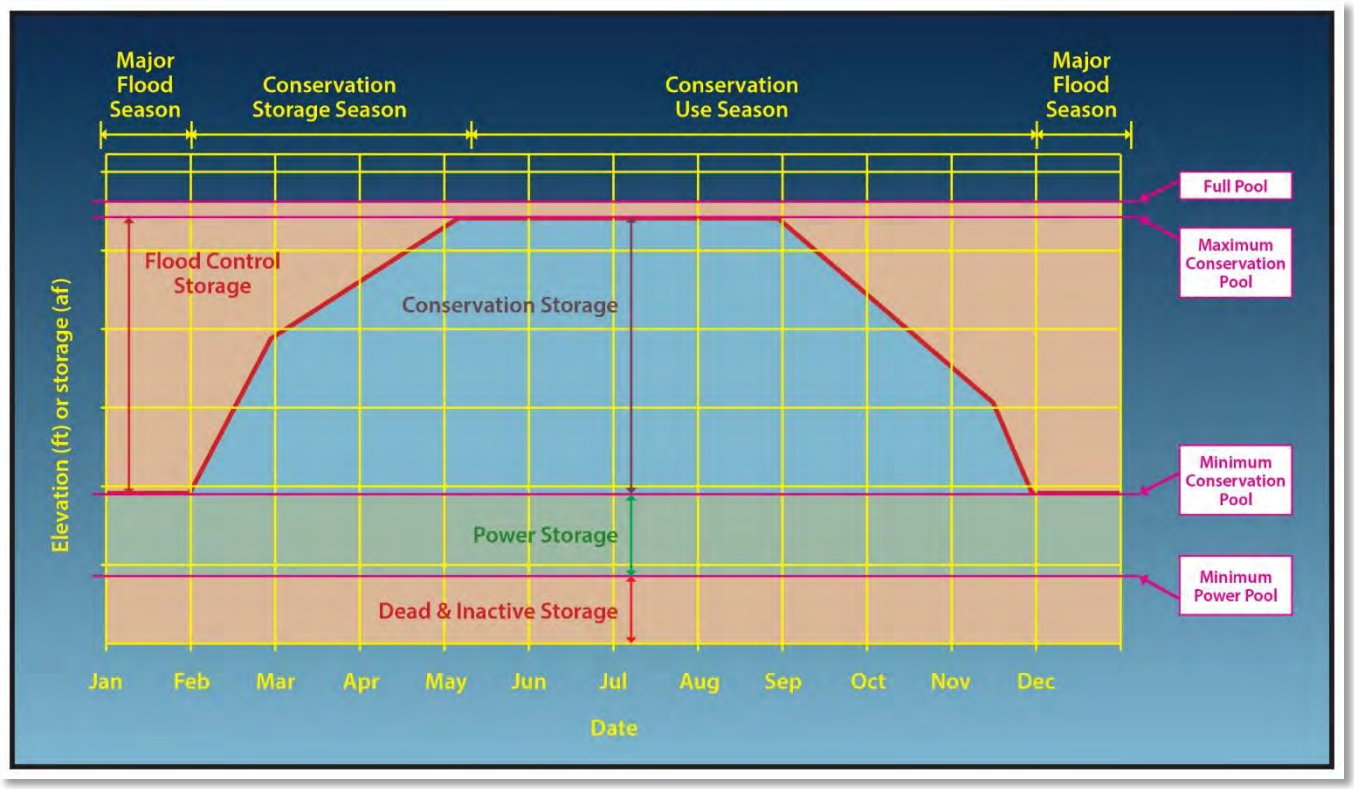


FIGURE 2. TYPICAL WATER CONTROL DIAGRAM

Flood Risk Management

The Corps' flood risk management mission is to reduce economic and environmental damage and prevent loss of life from flooding. The Willamette Valley system utilizes storage dams and reservoirs, operated to balance inflow and outflow to meet project authorized purposes. System water managers operate the system to make the best use of flood space (capacity in the reservoirs for inflows), and flood storage (the actual volume of water stored in a reservoir) over the **major flood season**. The system is generally operated in a coordinated manner to minimize flood risk in the lower Willamette Basin, as well as the tributaries below the dams. The dams are operated during flood events to meet flood regulation goals at control points. The furthest downstream control point in the Willamette System is at Salem. Control points are shown in Attachment 2.

In addition to the storage reservoirs, the system includes riverbank protection structures in the middle and lower basin. These structures were congressionally authorized and federally constructed for the control of floods or the prevention of erosion at various locations along the Willamette River and its tributaries. These structures include rip rap revetments, steel pile bulkheads, timber bulkheads, drift barriers, and earthen embankments.

Fish and Wildlife

The WVS affects native fish and wildlife in several ways. Construction and operation of dams, reservoirs, and revetments altered river hydrology, reduced sediment movement, simplified river channels, changed downstream water temperatures, and blocked access to habitat for migrating fish. Creation of reservoirs also provides new habitat for some species, and release of reservoir stored water during summer increases summer aquatic habitat downstream for many species.

ESA Consultation - The National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service (USFWS) provided Biological Opinions (BiOps) in 2008 on the effects of continued operations and maintenance of the WVS on ESA-listed species. The NMFS BiOp concluded that the proposed action would cause jeopardy to the Upper Willamette River Chinook and winter-run steelhead, and therefore included a "reasonable and prudent alternative" (RPA). The USFWS BiOp concluded that the proposed action did not cause jeopardy to the ESA-listed bull trout and Oregon chub (formerly ESA-listed) as long as the RPA from the NMFS BiOp was implemented. Measures in the RPA included improving flow and water quality, fish passage, hatchery management, and habitat restoration. Currently, complex actions at two dams are part of separate NEPA review: downstream fish passage at Cougar, and temperature control as well as downstream fish passage at Detroit Dam. Additionally, fish passage at Lookout Point is part of an ongoing research effort.

Fish Passage - The NMFS 2008 RPA included the following specific priority actions for implementation, with dates shown for those which have been completed:

- Upstream Passage Improvements (complete Cougar adult trap facility (2010), replace/improve Minto (2013), Foster (2014), Dexter, and Fall Creek adult fish collection facilities (2018).
- Downstream Fish Passage (Cougar, Detroit, and Lookout Point).
- Temperature Control (Detroit).

Hatcheries –When the WVS was planned and constructed during the 1940-60s, state and federal fisheries managers preferred implementation of hatcheries to maintain fish for harvest, as fish passage was deemed infeasible for WVS high head dams. Hatchery practices have impacted the wild productivity and health of native fish in the Willamette Basin. The NMFS 2008 RPA included several actions to reduce these effects, including preparation of Hatchery Genetic Management Plans, recently approved by NMFS. In addition to providing harvest opportunity, WVS hatcheries now also aide in the reintroduction of spring Chinook salmon above WVS dams.

Water Quality

Historically, severe water quality problems, caused by sewage and industrial discharges created anoxic conditions and bacterial loads unsuitable for aquatic biota and contact recreation. The Flood Control Act of 1950 authorized water quality as a purpose of the dams and reservoirs in the Willamette Valley. Historically, flow releases during the conservation season provided a pollution abatement benefit downstream of the reservoirs, and this benefit continues today.

Since 1950 laws such as the Clean Water Act have been passed and water quality concerns have evolved. Current water quality challenges related to the operation of the dams are primarily related to temperature and total dissolved gas. In-stream flow targets for fish were addressed as part of the NMFS 2008 BiOp.

Temperature

Water temperature is an important water quality parameter, as it affects the chemical and biological characteristics of water, metabolic rates of aquatic organisms, and the sensitivity of these organisms to pollution, parasites and disease. The typical operation of the Willamette Valley dams has created downstream water temperatures that are unnatural; cooler than normal throughout the summer and warmer than normal throughout the fall. Altered water temperatures below the dams have been identified as one of the limiting factors preventing the recovery of ESA-listed spring Chinook salmon and winter steelhead in the Willamette Basin.

The 2008 Biological Opinions from NMFS and USFWS identified measures for addressing temperature in the Willamette Basin. The Corps in coordination with NMFS, USFWS and the Oregon Department of Environmental Quality (ODEQ), have set temperature targets in select sub-basins. Operational temperature management strategies have been developed for for Cougar, Detroit/Big Cliff, Lookout Point/Dexter, and Fall Creek:

- **Cougar Dam** was retrofitted with a selective withdrawal tower to aid in meeting downstream water temperature goals for the purpose of ESA listed species. Cougar Dam is the only project in the Willamette Valley Project with selective withdrawal capabilities to manage downstream water temperatures.

- **Detroit Dam** discharge is reregulated by Big Cliff Dam, which is located just downstream. As a multipurpose dam, Detroit is operated to provide downstream temperature control by blending flow released over the spillway with flow released through deep outlets, the turbines or regulating outlets. Mixing takes place in Big Cliff Reservoir before water is passed downstream through Big Cliff Dam.
    - *Structural temperature control management at Detroit is currently being evaluated in a separate EIS.*
- **Lookout Point Dam** is operated to provide interim temperature control by blending flow released over the spillway with flow released through the deep outlets, the turbines or regulating outlets. Mixing takes place in Dexter Reservoir before water is passed downstream through Dexter Dam.
- Operational water temperature is informally conducted at **Fall Creek Dam** using a combination of the fish horns and regulating outlets. The main objective for the Fall Creek temperature management is to attract adult fish back to the fish facility located at the base of Fall Creek Dam.

Total Dissolved Gas

Past water quality monitoring indicates that the operation of Willamette Valley Project dams can produce Total Dissolved Gas (TDG) that exceed Oregon water quality standards under certain operating ranges. Elevated levels of TDG are created by the entrainment of air in spill releases (either through regulating outlets or spillways) that plunge deep into the stilling basin and river channel downstream of a dam. An increase in TDG supersaturation can be harmful to fish. For this reason, ODEQ has established water quality standards for TDG.

The amount of TDG generated through dam operations is highly dependent on the amount of water discharged, the dam outlets used to pass water, and the water temperatures observed during a particular operation. To reduce high levels of TDG, the general operating guidance is as follows:

- Discharge water through the powerhouse to reduce/dilute the TDG generated from use of the spillways or regulating outlets.
- Under high flows, distribute the discharge over as many spillbays as possible with a uniform pattern, rather than putting all discharge through one bay.
- TDG generated at the high-head peaking projects may be reduced when passed through the downstream re-regulating dam. Using the powerhouse to further reduce/limit TDG from being passed downstream is possible, unless maintenance limits turbine use. Whenever possible, maintenance is timed so as to be least harmful to ESA-listed fish below the projects.

Hydropower

Of the 13 dams in the Willamette system, eight produce hydropower. The operation of these dams for power can be classified as either base load, peaking, or reregulation. The eight hydropower dams are:

- Detroit (peak) and Big Cliff (reregulation) on the North Santiam River
- Green Peter (peak) and Foster (reregulation) on the South Santiam River
- Cougar (base) on the South Fork McKenzie River
- Lookout Point (peak), Dexter (reregulation), and Hills Creek (base) on the Middle Fork Willamette River.

Hills Creek and Cougar Dams are base load projects and are typically on-line all of the time and are not used for peaking. During line interruptions and transmission maintenance outages, Hills Creek Dam can become the sole source of power for residents in the community of Oakridge, Oregon.

Lookout Point, Detroit, and Green Peter are used for peaking purposes with their respective reregulation dams run similar to base load projects. Generation from peaking projects is generally meant to correspond with incidences of high energy use in the mornings and early evenings. The generation at the reregulation project is more uniform. The reregulation reservoirs are used to absorb the fluctuations in flows from their upstream storage projects and release flows at a more uniform level. Table 2 includes the project type, location and the nameplate capacity of each project. The nameplate capacity is the maximum rated output of the generator and is commonly expressed in megawatts (MW).

All projects with hydropower facilities include exclusive **storage** space for power generation during critical power production periods. This storage is relatively small, and is between the **minimum conservation pool** and the **minimum power pool** elevations. Drafting into this storage is limited to special power requirements and is generally kept full to increase the hydraulic head for power generation.

TABLE 2. TOTAL NAMEPLATE CAPACITY (MW) FOR THE 13 WVS POWER PROJECTS

Project Name	Type	Location	Total Nameplate Capacity (MW)
Detroit	Peaking	North Santiam River	115
Big Cliff	Re-Regulation	North Santiam River	18
Green Peter	Peaking	South Santiam River	92
Foster	Re-Regulation	South Santiam River	23
Lookout Point	Peaking	Middle Fork Willamette River	120
Dexter	Re-Regulation	Middle Fork Willamette River	17.3
Hills Creek	Baseload	Middle Fork Willamette River	30
Cougar	Baseload	McKenzie River	28.8
		Total	**444.1**

Bonneville Power Administration (BPA) markets and transmits the power produced by the Corps' hydropower plants. Operation of the power facilities at the projects is a highly coordinated effort between the Corps and BPA. Daily generation schedules are made by the Corps, after discussions with the head scheduler for BPA. The close coordination between the Corps and BPA allows for additional flexibility in project operations when the need arises for power and non-power emergency operations.

Recreation

Within the Willamette Valley System, the Corps cooperates with the U.S. Forest Service, Oregon State Parks**, Oregon Department of Fish and Wildlife**, Bureau of Land Management, and counties including Linn, Lane, and Marion, to build and manage a system of water-related recreation facilities. Recreation is a project purpose at all of the Corps' reservoirs and along most of the reaches downstream of the dams. The **conservation pool** is largely used to fulfill the Corps' recreation mission as a number of the reservoirs are heavily used for recreational purposes during the **conservation season**.

Water Supply

The Willamette Valley System has a combined conservation storage capacity of approximately 1,590,000 acre-feet, which is currently allocated to Joint Use.

In the state of Oregon, water law distinguishes between diverting water for storage, and releasing water from storage for use; each requires a different water right. In Oregon, the right to store water conveys ownership of the stored water. The **U.S. Bureau of Reclamation** (Reclamation) has held two Oregon water storage rights on behalf of the federal government for all conservation storage since construction of the 13 dams was completed. These state water rights that allow the federal government to store water are designated exclusively for irrigation. Of the 1,590,000 acre-feet of conservation storage, approximately 77,000 acre-feet of stored water (roughly five percent of total conservation storage) is currently contracted through Reclamation for irrigation. Reclamation may enter into irrigation contracts up to 95,000 acre-feet of stored water per year as established under the 2008 BiOp.

Willamette Basin Review Feasibility Study

The Willamette Basin Review Feasibility Study was re-initiated in 2015 with the goal of reallocating conservation storage for the benefit of ESA-listed fish (F&W), agricultural irrigation (AI), and municipal and industrial (M&I) water supply, while continuing to fulfill other project purposes. The study analyzed current water uses in the basin for F&W, M&I, and AI and proposed a combined conservation storage reallocation and water management plan that would provide the most public benefit within the policies and regulations of the Corps and the state of Oregon. The non-federal sponsor for the feasibility study is the Oregon Water Resources Department (OWRD).

The feasibility study is an ongoing effort and the Corps is currently in ESA consultation with NMFS on the proposed reallocation. If completed and approved prior to the drafting of this EIS, it would be represented in the No Action Alternative (i.e. current management direction).

Navigation

While currently there is no commercial navigation traffic in the upper Willamette River, navigation is an authorized purpose of the system. The original authorization by Congress for navigation stipulated a minimum flow of 5,000 cubic feet per second (cfs) between Albany and the Santiam River, and 6,500 cfs downstream to Salem to provide navigation depths of 6 feet and 5 feet respectively. These authorized flows are maintained during the conservation season by releasing water stored in the Corps' reservoirs. Augmenting downstream flows at Albany and Salem will continue to be important in the future for water quality and fishery purposes. The water quality and fishery strategies for the Willamette River were based on the navigation flow requirements originally established at Albany and Salem.

How To Comment:

Mail	Email	Online
U.S. Army Corps of Engineers, CENWP-PME-E ATTN: Suzanne Hill P.O. Box 2946 Portland, OR 97208-2946	willamette.eis@usace.army.mil	Public Comment Portal (link on project website): https://cenwp.maps.arcgis.com/apps/CrowdsourceReporter/index.html?appid=62723471dc7444f8a7256aa59f79926a

All comments received will become part of the administrative record and are subject to public release under the Freedom of Information Act, including any personally identifiable information such as name, phone numbers, and addresses.

Comment Period Closes June 28, 2019

For More Information:

Willamette Valley: https://www.nwp.usace.army.mil/Locations/Willamette-Valley/

Willamette Valley System Operations and Maintenance EIS:
https://www.nwp.usace.army.mil/Locations/Willamette-Valley/Evaluation/

Cougar Downstream Passage EA: https://www.nwp.usace.army.mil/Locations/Willamette-Valley/Cougar/

Detroit Downstream Passage and Temperature Control EIS:
https://www.nwp.usace.army.mil/Willamette/Detroit/fish-passage/

Willamette Basin Review Feasibility Study: https://www.nwp.usace.army.mil/willamette/basin-review/

About the Corps (Portland District website): https://www.nwp.usace.army.mil

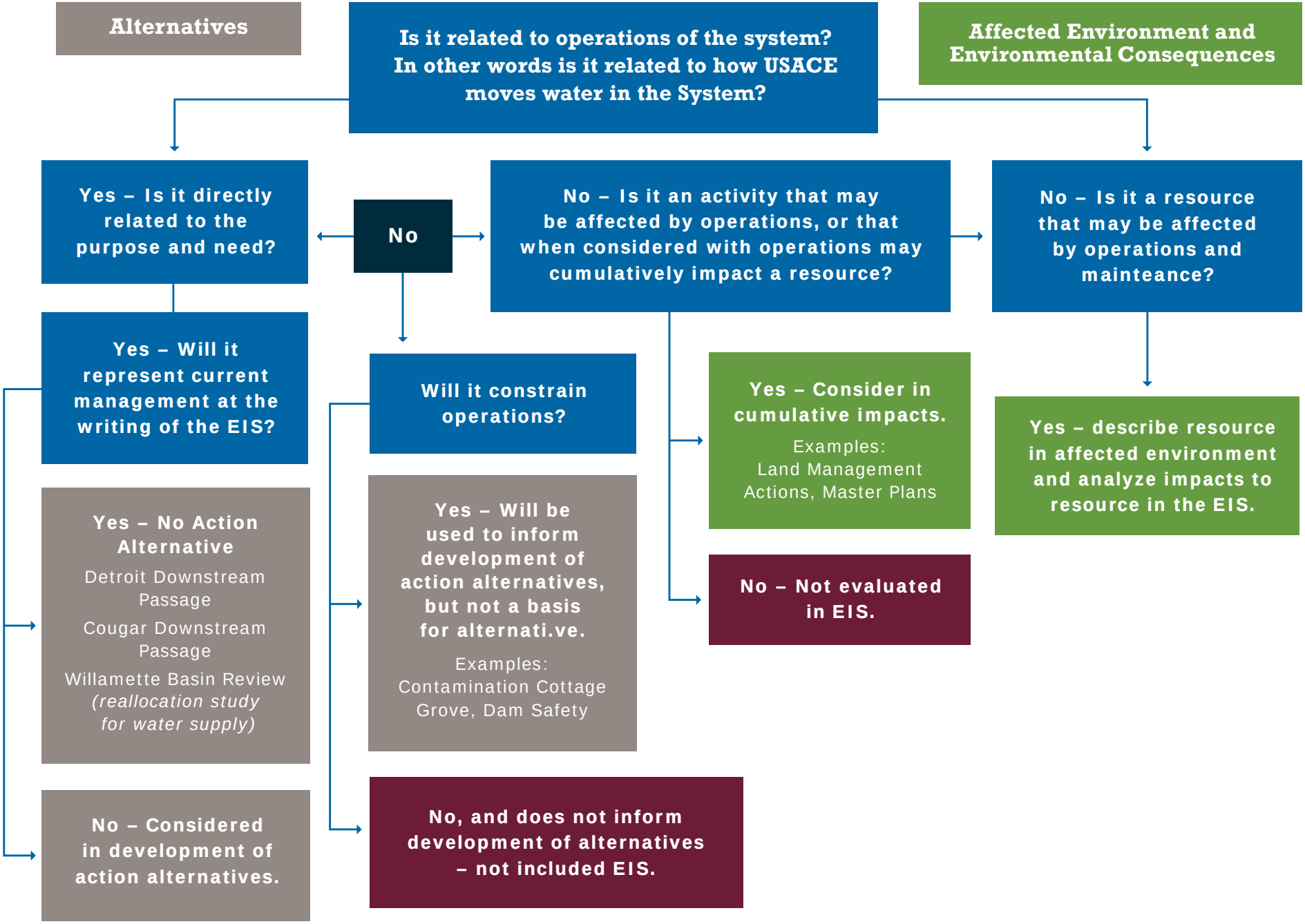
Portland District Water Management Reservoir Regulation and Water Quality Section http://www.nwd-wc.usace.army.mil/nwp/wm/

Videos of the Willamette system: http://www.youtube.com/user/PortlandCorps

Water Data (DBQuery): http://www.nwd-wc.usace.army.mil/dd/common/dataquery/www/

River Flow (real time and forecasted):
https://water.weather.gov and https://www.nwrfcoaa.gov/rfc/

How is the Corps making decisions regarding the "scope" of the EIS?



The Willamette River Basin

US Army Corps of Engineers ®
Portland District

Columbia River
Portland
Tualatin
Tualatin R.
N. Yamhill R.
Oregon City
River
Willamette Falls
Molalla R.
Clackamas R.
5
S. Yamhill R.
Willamette
Pudding R.
Salem
Little N. Santiam R.
N. Santiam R.
Big Cliff
Minto
Detroit
N. Santiam R.
Albany
S. Santiam R.
Mary's R.
Middle Santiam R.
Marion Forks
South Santiam
Green Peter
Foster
Willamette River
Long Tom R.
Calapooia R.
5
McKenzie River
Blue River
Fern Ridge
McKenzie
McKenzie R.
Leaburg
Cougar
Eugene
S. Fk. McKenzie R.
Fall Creek
Dexter
Lookout Point
N. Fork Middle Fork R.
Willamette R.
Dorena
Willamette
Cottage Grove
Hills Creek
Hills Creek

Dams
- With Hydropower
- Without Hydropower
- Re - Regulating

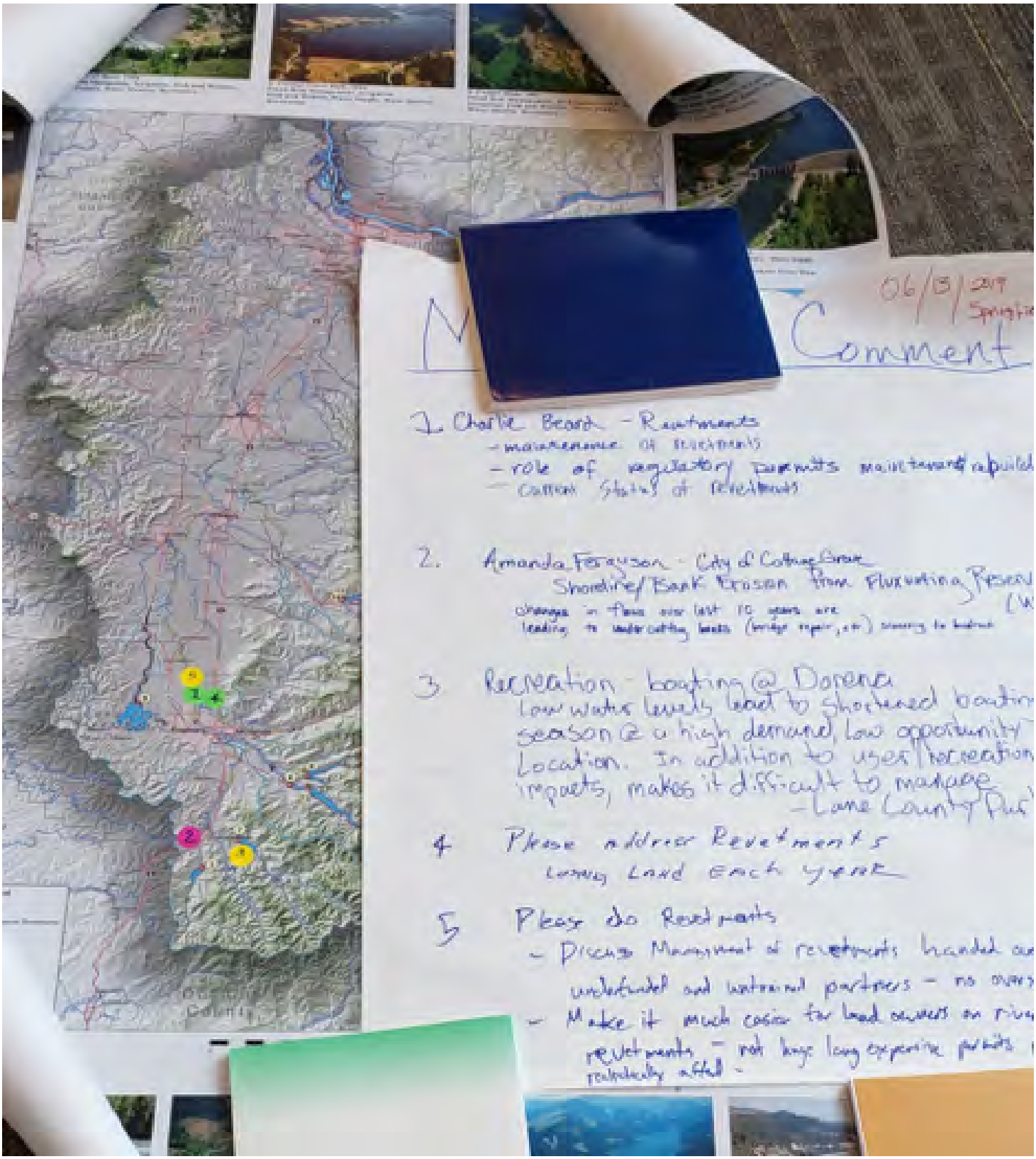
Fish Facilities
- Adult Collection
- Hatchery
- Control Point (approximate location)

0 5 10 15 20 25 30
APPROXIMATE MILES

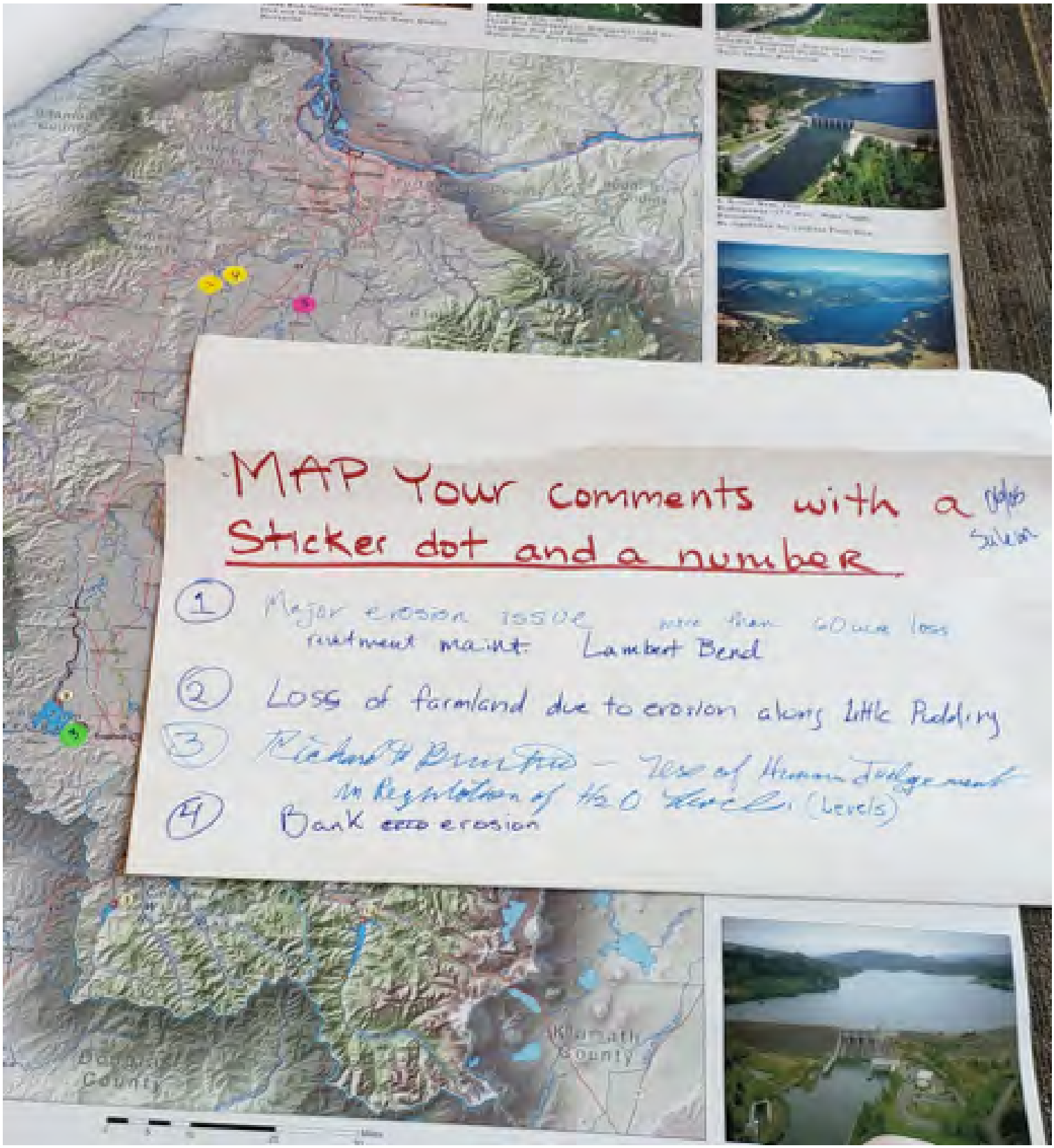
N

Attachment I: Public Scoping Meeting Comments Received via Map

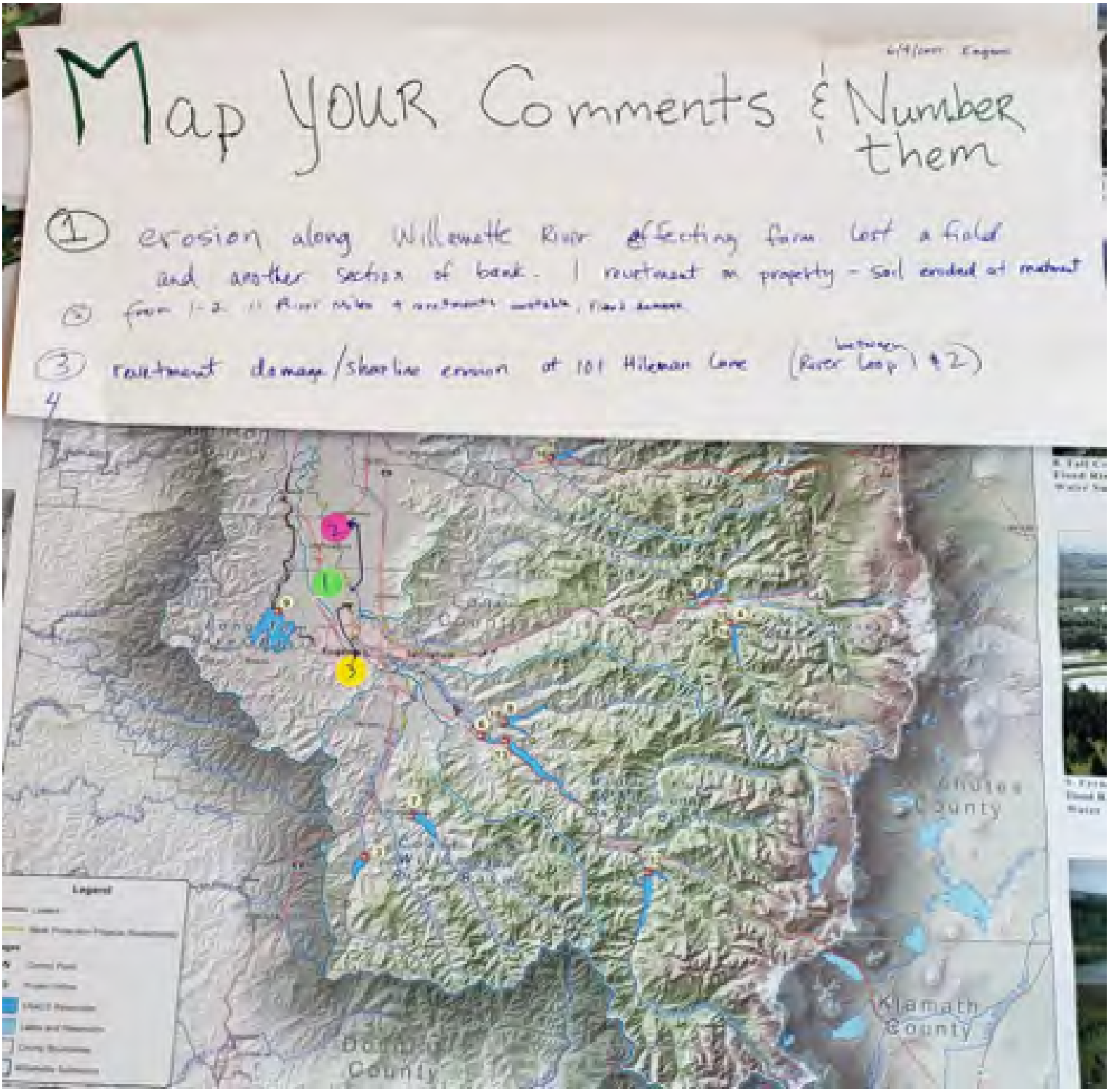
Springfield



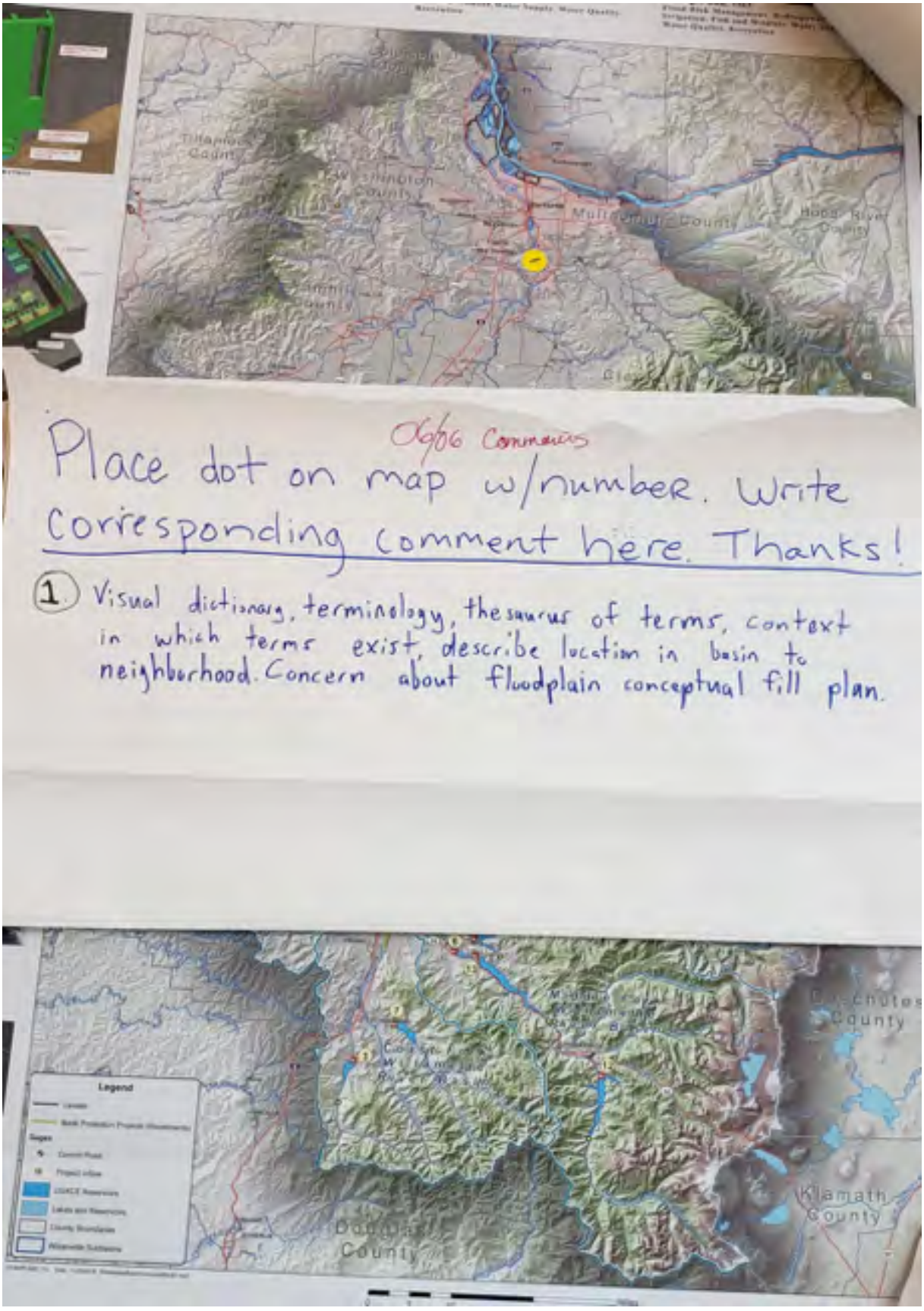
Salem


MAP Your comments with a Sticker dot and a number
1 Major erosion issue
Lambert Bend
2 Loss of farmland due to erosion along Little Pudding
3
4 Bank erosion
Klamath County

Eugene


Map YOUR Comments & Number them
1 erosion along Willamette River affecting farm. Lost a field and another section of bank. | revetment on property - soil eroded at revetment
2 from 1-2 ... River miles + revetments unstable, flood damage
3 revetment damage/shoreline erosion at 101 Hileman Lane (River Loop 1 & 2)
4
Douglas County
Klamath County
Legend

Portland



Place dot on map w/number. Write corresponding comment here. Thanks!

06/06 Comments

1. Visual dictionary, terminology, thesaurus of terms, context in which terms exist, describe location in basin to neighborhood. Concern about floodplain conceptual fill plan.

Corvallis

The Salt Creek (Yamhill) in stream dams make it difficult to grow streamside vegetation (flooded in winter / dry in summer) Polk SWCD & OSU Ext are working to figure out how to address.

Great that Long Tom WC & City of Monroe are removing dams @ Monroe → fish passage & improved water quality

3. Analyze draw-downs of more reservoirs where possible to benefit out-migrating ESA-listed fish. Analyze how the reservoirs impact bull trout where they are present. Look at operations to benefit fish that could impact the rule curves, including placing fish flow needs as a priority after flood control.

Attachment J: Public Comments Received

From:	Liz VanLeeuwen
To:	Hill, Suzanne CIV USARMY CENWP (USA)
Subject:	[Non-DoD Source] RE: Testimony to the U.S. Army Corps of Engineers-Willamette Valley Systems Operation and Management EIS
Date:	Tuesday, June 04, 2019 2:23:27 PM

To: Suzanne Hill, CIV US Army CENWP(USA)

6/3/2019

RE: U.S. Army Corps of Engineers-Willamette Valley Systems Operation and Maintenance EIS

Greetings:

It is my understanding that your agency is seeking input on how to better manage our stored water supply in the West. Having lived some 60 years of my adult life on a farm bordered by the Willamette River at Irish Bend in Linn County, OR, I have seen the effects of a number of floods and releases of stored water. In my opinion, the needs listed below are things I hope you will petition the U.S. Congress to authorize action on. If you succeed, you will have solved several important issues.

Oregon needs more major water storage capacity to save more of the spring snowmelt and the winter rains. The plus side of catching more of this precious liquid is multiple:

- *reduce flooding, soil erosion and other damages;*
- *mitigate the annual contest over who gets water in the summer and fall:*
  - *the cities for their multiple needs*
  - *farmers –the producers of our food and fiber*
  - *the fish*
  - *the water recreationalists*

Increased major water storage is also a real plus because of the opportunity for increased non-polluting electricity.

In addition to major water storage, the US Corps needs to authorize and do channel maintenance in the rivers which have been listed as navigable so they actually are

navigable. Channel maintenance would also address the serious problem of eroding banks due to gravel and debris that have blocked or partially blocked the main channel.

Why do I think my opinion is viable? Because I am a farmer and producer who has been involved in Oregon natural resource policy for many years. I also served from 1981 to 1999 (18 years) as Linn County's elected State Representative to the Oregon Legislature. Since then I have been repeatedly elected to the Linn County Soil and Water Conservation District Board. I am an active and long term Farm Bureau member.

I respectively ask you to seriously consider this appeal not only on my behalf but for many of the people I have represented over the years.

Liz (Elizabeth) VanLeeuwen

27070 Irish Bend Lp., Halsey, OR 97348
541-369-2544

Sent from Mail for Windows 10

[Non-DoD Source] Willamette EIS CENWP–PME–E

SEVERSON Joe * OSMB <Joe.Severson@oregon.gov>

Tue 6/25/2019 1:53 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>; Hill, Suzanne CIV USARMY CENWP (USA) <Suzanne.Hill@usace.army.mil>;

Cc:BELLEQUE Janine * OSMB <Janine.BELLEQUE@oregon.gov>;

Suzanne Hill
Attn: CENWP–PME–E

Thank you for the opportunity to participate in the development of the scope of the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) for the Willamette Valley System (WVS).

The Oregon State Marine Board (OSMB) is an advocate for recreational boating safety, navigation and access pursuant to Oregon Revised Statues chapter 830 and Oregon Administrative Rules chapter 250. The Boating Facilities Program provides engineering services, technical assistance and grant funding for public recreational boating access facilities.

The Oregon State Marine Board comments are made in part based on a comprehensive review of the cumulative impact on recreational boating activities, public boating facilities, waterway rules, safety, conflict and congestion within the WVS. Additionally, our comments will focus on the impacts to floating structures and boat ramps in the WVS in relation to modifications to flow for temperature control operations by the Corps.

According to National Marine Manufacturing Association boating in Oregon is a $1.7 billion industry (2016). The Willamette Valley System (WVS) offers numerous recreational boating opportunities and a wide variety of recreational boating activities. Many recreational boating activities have historical use in the WVS. Recreational boating facilities in the WVS are relatively older and not designed for low flow or lowered water elevations. Modifications to operations that impact flow would have the potential to expose boat ramp toe. The toe of the boat ramp is the lower end of the ramp and extends below the design low water elevation to provide a hard surface for the trailer to travel on during launch and retrieval. Toe elevations of a launch ramp have a direct effect on the period of serviceability of the launch ramp for boaters. It is important to carefully evaluate any changes or modifications to the historic water fluctuations for the water body to ensure usability of the launch ramp. Please note that many boat ramps are old and design low water elevation was different 20-50 years ago. Many ramp toes have been significantly damaged by power loading. OSMB asks that the Corps evaluate how modifications to operations, including flow, sedimentation accumulation, and scour will impact public boating facilities, economic impacts to local areas, and recreational boating activities on the rivers, reservoirs and lakes within the WVS.

Floating structures are increasing on rivers in the WVS. The Willamette River between river mile 30 and river mile 50 is commonly known as the Newberg Pool. In the past 20 years, for example; the number of floating structures in the Newberg Pool has doubled, growing to over 375 floating structures. Floating structures were permitted and designed with specific water depths, flow and elevations in part to address ESA permitting requirements. Modifications to operations that impact flow would have the potential to have adverse impacts on existing and future floating structures. Existing floating structures may not comply with current ESA dock

guidelines and future floating structures would be expected to be located into deeper water, extending them farther out into the river. This would create an extreme impact to public use of that waterway for navigation, safety and recreation. As an example; the National Marine Fisheries is requiring floating structures to be located in 15 feet of water at ordinary low water elevations in the lower Willamette River section. In some cases this would place a floating structure 400 feet from shore and further into the river. This is a very serious concern for safety, navigation and the public use of the waterway. OSMB asks that the Corps evaluate how modifications to operations that determine flow, temperature control and water elevations will impact existing permitted and future permitted floating structures in the WVS.

The public waters in the Willamette Valley System are heavily used by all recreational boaters. As a result OSMB recommends that the Corps carefully evaluate how any modifications to operations and maintenance of the WVS will impact boating facilities and floating structures; including the historical and current recreational boating activities for safety, navigation and future ability to permit, repair, or replace boating facilities and floating structures. The Oregon State Marine Board would like to remain informed on this planning process.

Thank you for this opportunity to comment.

Joe Severson, GISP
Oregon State Marine Board
Planning and GIS Coordinator
Boating Facilities Program
503.378.2629

Rob Bignall | Willamette Salmon Steelhead Recovery Coalition
Sherwood, Oregon | Northwest Guides and Anglers Association
Rob.bignall@gmail.com | X Please send email notifications about this project

1. **Mitigation:**
   a. Given the constraints to hatchery production identified in the draft HGMPs, what is the Corps' mitigation obligation at present?
   b. How does the Corps expect this obligation to change over the timeframe for the analysis period?

Rob Bignall
Sherwood, Oregon
Rob.bignall@gmail.com

Willamette Salmon Steelhead Recovery Coalition
Northwest Guides and Anglers Association
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1. **Research & Monitoring:** Funding of R&M has been unpredictable in the recent past. Will the Corps commit to requesting and allocating the funds necessary to sustain sufficient R&M needs?

Rob Bignall | Willamette Salmon Steelhead Recovery Coalition
Sherwood, Oregon | Northwest Guides and Anglers Association
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1. **Volitional vs. Non-Volitional Downstream Passage:** With the exception of Fall Creek and the Lookout Point drawdown proposal (which was not implemented), the Corps has only proposed or proceeded with non-volitional downstream passage projects.
   a. Given the difficulties with similar fish collection projects including the Pelton Round Butte project on the Deschutes River and the Lewis River project, why does the Corps expect the proposed fish collection projects will be successful?
   b. Has the Corps analyzed whether the flows and effective forebay sizes of Detriot and Cougar will yield sufficient collection efficiencies to support the agency's claims?
   c. Has the Corps analyzed the impact of copepod-related morbidity of volitional vs. non-volitional passage routes?
   d. Why did the Corps exclude the volitional bypass pipe proposal from the NEPA analysis of the Cougar project?
   e. Non-volitional proposals require continued funding for maintenance and operations. What are the projected ongoing costs associated with these proposals?

Rob Bignall
Sherwood, Oregon
Rob.bignall@gmail.com

Willamette Salmon Steelhead Recovery Coalition
Northwest Guides and Anglers Association
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1. **Cougar Downstream Passage:** A prototype fish collector was evaluated at Cougar with results indicating that the collection efficiency of juvenile downstream migrants was quite low.
   a. Why does the Corps expect the current design to be more successful?
   b. What are the expected collection efficiencies?
   c. Will the collection rate be significantly superior to volitional routes via reservoir drawdowns that have been evaluated in the past?
   d. The Corps noted that drawdowns and passage through the diversion tunnel may not be feasible due to structural issues. Could these infrastructural issues be resolved through redesign or engineering?

Rob Bignall | Willamette Salmon Steelhead Recovery Coalition
Sherwood, Oregon | Northwest Guides and Anglers Association
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1. **Lookout Point Downstream Passage:** The Corps previously proposed and analyzed through NEPA drawdown operations at Lookout Point to assist in juvenile downstream passage, and this proposal was strongly supported by the wildlife management agencies.
   a. Why did the Corps fail to proceed with implementation of the proposed action?
   b. Will drawdown operations at Lookout Point be analyzed?

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Rob.bignall@gmail.com

Willamette Salmon Steelhead Recovery Coalition
Northwest Guides and Anglers Association
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1. **Flows:**
   a. How will flow targets be defined? (We need to consider more than the minimum needs of listed fish and look at all flow needs for all species of fish and wildlife.)
   b. How will the ongoing reallocation process inform the development of alternatives in this process? (The biological and habitat needs of all fish and wildlife species need to be defined first before dividing up the reservoir storage space. Also, fish shouldn't be part of a "share the pain" approach in shortage years - at least not the ESA-listed fish.
      i. If it will be integrated, then how does the fact that NMFS determined the proposed reallocation would result in jeopardy get resolved in advance of the Systems analysis without derailing the proposed timeline for this process and the formulation of the next BiOp?
      ii. Will flow targets for fish (or at least the listed fish) be met even in shortage years?
   c. Doesn't it make more sense to postpone reallocation and make it part of the new BiOp/EIS process? The EIS/BiOp process is bound to consider and produce significant new information that will inform reallocation, including an updated flow dataset for flow modeling (v. the dataset ending in 2008). The EIS/BiOp process also could result in changes to some of the fixed constraints assumed in reallocation, including rule curves and available storage pools.
   d. Will the EIS consider and propose administrative structures for contracts to protect water released for fish from diversion downstream under "live" flow water rights?

Rob Bignall | Willamette Salmon Steelhead Recovery Coalition
Sherwood, Oregon | Northwest Guides and Anglers Association
Rob.bignall@gmail.com | X Please send email notifications about this project

1. **Rule Curves:**
   a. In the O&M analysis, will the Corps review and/or remodel the rule curves?
   b. Will the analysis include consideration of run of the river, delayed refill, or drawdowns to facilitate juvenile downstream passage and support recovery efforts?

Rob Bignall | Willamette Salmon Steelhead Recovery Coalition
Sherwood, Oregon | Northwest Guides and Anglers Association
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1. **Hydropower:** At the February 22, 2019 event, Corps and BPA representatives indicated that the agencies are considering alternatives for hydropower production at Cougar dam and for the Willamette Project to assist in downstream passage and necessary recovery measures.
   a. What modifications to hydropower operations are the agencies evaluating?
   b. Are the agencies considering eliminating peaking power?
   c. Are the agencies considering modifying power operations to provide downstream volitional passage routes for listed fish (i.e. turning turbines off and performing drawdowns during peak migratory periods)?
   d. Will the Corps consider operational changes or removal for the non-flood control reregulating dams (Big Cliff and Dexter) in order to assist with fish passage and recovery efforts?

Rob Bignall | Willamette Salmon Steelhead Recovery Coalition
Sherwood, Oregon | Northwest Guides and Anglers Association
Rob.bignall@gmail.com | X Please send email notifications about this project

1. **Authority:** The 2008 Biological Opinion RPA required the Corps to identify where the agency lacks the authority to accomplish the required measures and to seek Congressional authorization where necessary to complete the mandated actions.The Corps has made previous claims that the agency lacks the legal authority or authorization to fully and substantively evaluate and/or implement specific measures or recovery actions.
    a. How will the Corps address the different authorities that often result in operational conflicts for the projects in its analysis?
    b. Will the Corps consider operational and maintenance changes that may impact the fulfillment of authorized purposes (other than flood control and human health/safety) if such operations will assist with meeting ESA recovery obligations?
    c. Please identify the specific recovery actions that the Corps may implement, but where the agency lacks sufficient legal authority. Does the agency intend to seek Congressional authorization to complete the actions identified? What is the agency's anticipated timeline for doing so?

Rob Bignall | Willamette Salmon Steelhead Recovery Coalition
Sherwood, Oregon | Northwest Guides and Anglers Association
Rob.bignall@gmail.com | X Please send email notifications about this project

1. **Timeline:** The Corps is significantly behind in initiating and completing the recovery measures identified in the 2008 BiOp, especially as they relate to downstream passage.
   a. Why has the agency failed to meet the timelines outlined?
   b. Why has the agency failed to initiate the required actions relating to downstream passage in the Middle Fork Willamette as required?
   c. How can the agency assure Congress and the public that future timelines will be met?

Rob Bignall
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Willamette Salmon Steelhead Recovery Coalition
Northwest Guides and Anglers Association
X Please send email notifications about this project

1. **Interim actions undertaken during the formulation of the Systems EIS and new Biological Opinion:**
   a. The Corps has stated that a new BiOp will not be finalized until at least 2023. What specific actions from the 2008 BiOp RPA will the Corps undertake in the interim?

Rob Bignall | Willamette Salmon Steelhead Recovery Coalition
Sherwood, Oregon | Northwest Guides and Anglers Association
Rob.bignall@gmail.com | X Please send email notifications about this project

1. **COP II**
    a. How will the COP II report inform the alternative development and NEPA analysis?

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

JUN 2 7 2019

REGIONAL
ADMINISTRATOR'S
DIVISON

U.S. Army Corps of Engineers, CENWP-PME-E
Attn: Suzanne Hill
P.O. Box 2946
Portland, Oregon 97208-2946

Dear Ms. Hill:

The U.S. Environmental Protection Agency has reviewed the U.S. Army Corps of Engineers Notice of Intent to Prepare an Environmental Impact Statement for the Willamette Valley System Operations and Maintenance (EPA Project Number 19-0023-COE). Our review of the NOI was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The Willamette Valley System consists of 13 multipurpose dams and reservoirs, riverbank protection projects in the Willamette River Basin in Oregon and hatchery programs to mitigate for effects of the project on fish habitat. The EIS will evaluate the impacts of continued operations and maintenance of the Willamette Valley System.

Our attached comments and recommendations include the topics and issues we believe warrant consideration and analysis during the development of the EIS. Overall, the EPA encourages the development of an EIS that evaluates and compares a full range of reasonable alternatives and discusses the direct, indirect, and cumulative impacts of the proposed action.

Thank you for this opportunity to comment. If you have questions about our comments, I can be reached at (206) 553-6322 or peterson.erik@epa.gov.

Sincerely,

Erik Peterson, NEPA Reviewer
Policy and Environmental Review Branch

Enclosure

U.S. Environmental Protection Agency Scoping Comments for the Willamette Valley System Operations and Maintenance Environmental Impact Statement

U.S. Environmental Protection Agency Scoping Comments for the Willamette Valley System Operations and Maintenance Environmental Impact Statement

Purpose and Need

We recommend the EIS include a statement of the purpose and need for the proposed project, consistent with the implementing regulations for NEPA.[1] We encourage the Corps to involve interested agencies and stakeholders in the development of the purpose and need statement to the extent possible.

Range of Alternatives

Consistent with the purpose of the NEPA,[2] the EPA encourages selection of alternatives that protect, restore and enhance the environment. We support lead agencies' efforts to identify and select alternatives which maximize environmental benefits, and, avoid, minimize, and/or otherwise mitigate environmental impacts. We further note our support for actions that restore natural processes and recommend that you consider an EIS alternative which maximizes opportunities to restore natural hydrologic, geomorphic, and, biological processes.

Toxics

Common toxic contaminants found in river systems include pollutants like polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), polybrominated diphenyl ethers (PBDEs, or flame retardants), dichloro-diphenyl-trichloroethane (DDT) and other legacy pesticides, mercury, current use pesticides, pharmaceuticals and personal care products and trace elements. Contaminants can impair water quality, affect aquatic organisms like insects and salmon and resident fish and impair environmental and human health.

We recommend that the EIS include impacts of reservoir operations and management on the mobilization and transformation of inorganic mercury and methylmercury in the planning area. Such an analysis could include the impact of reservoir stratification, food web dynamics/fish stocking, vegetation management, nutrient loading and water-level fluctuations on methylmercury production and bioaccumulation. We also recommend the EIS analyze how reservoir operations might be altered to potentially reduce methylmercury production and bioaccumulation.

Water Quality

Water quality standards

We recommend that the EIS disclose relevant water quality standards, including the State's numeric standards, narrative standards, designated uses and antidegradation provisions. We also recommend that the EIS identify and disclose the current water quality of water bodies likely to be impacted by the project, the nature of the potential impacts, and the specific discharges and pollutants likely to impact those waterbodies.

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[1] 40 CFR 1502.13
[2] 40 CFR 1500.1

We recommend analysis of the potential effects of current and proposed system operations and maintenance on surface water temperatures; total dissolved gas; pH, dissolved oxygen, sediment quantity (sediment transport throughout the basin) and quality, nuisance algae and related parameters and the potential for the alteration to the fate and transport of toxics, such as inorganic mercury and methylmercury.[3]

We recommend using models to analyze temperature, dissolved oxygen and nuisance algae dynamics in reservoir and downstream waters.

Impaired waters and Total Maximum Daily Loads

Section 303(d) of the Clean Water Act requires states to identify waterbodies that do not meet water quality standards and to develop Total Maximum Daily Loads for those waters to meet established water quality criteria and associated beneficial uses.

We recommend the EIS describe relevant Total Maximum Daily Load allocations, the water bodies to which they apply, and associated water quality standards and pollutants of concern. Water bodies with approved TMDLs that remain impaired should be identified.

We recommend the EIS identify waterbodies potentially affected by the project that are listed as impaired on the State of Oregon's most current EPA-approved 303(d) list. If additional pollutant loading is predicted to occur to a 303(d)-listed stream because of the project, we recommend that the EIS include measures to control existing sources of pollution to offset additional loading. We recommend the EIS describe existing restoration and enhancement efforts for those impaired waters, how the proposed project will coordinate with on-going protection efforts, and any mitigation measures that will be implemented to avoid further degradation of impaired waters.

The revision to the 2006 Willamette River Basin Mercury TMDL includes consideration of how reservoir operation and management can influence mercury cycling. We recommend that the Corps utilize information from the Willamette River Basin Mercury TMDL revision process in the EIS, including for example, the Mercury TMDL Development for the Willamette River Basin (Oregon) Technical Support Document.[4]

Anti-degradation

Anti-degradation provisions of the Clean Water Act apply to those waterbodies where water quality standards are currently being met. In certain high-quality waters, the anti-degradation provisions prohibit degrading water quality unless it is determined that allowing lower water quality is necessary to accommodate important economic or social development in the area in which the waters are located. In high quality waters that constitute an outstanding national resource, water quality must be maintained and protected.[5] We recommend that the EIS describe how the Clean Water Act antidegradation requirements will be met.

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[3] For a list of all WQS and designated uses that apply to the Willamette Basin, please see Oregon Administrative Rules Section 340 Subsection 041, including statewide and basin-specific WQS, designated use tables and maps, and toxics tables in that Subsection.

[4] Accessed online 6/26/19 at: https://www.oregon.gov/deq/FilterDocs/wbmtmdl042019mm.pdf

[5] 40 CFR Section 131.12

Drinking water

Since dam operations and maintenance may impact drinking water, we recommend that the EIS identify any public or private drinking water sources for communities within the project area, activities that could potentially affect drinking water wells or source water areas, potential contaminants that may result from the proposed project and mitigation measures that would be taken to protect drinking water sources. We further recommend that the EIS include an analysis of the different project alternatives' influence on harmful algal blooms in drinking water (cyanobacteria and cyanotoxins).

Water temperature

We recommend that the EIS analyze the effects of current system operation on temperature regimes and include alternatives that allow for the exploration of different dam operations and maintenance scenarios and their effects on current and predicted future water temperature in the basin.

Within the water temperature analysis, we recommend that the EIS address how dams and their reservoirs can affect thermal patterns in the following ways:

- Dams can increase maximum temperatures by holding waters in reservoirs, especially in shallow areas near shore;
- Reservoirs, due to their increased volume of water, can be more resistant to temperature changes resulting in reduced diurnal temperature variations and prolonged periods of warm water. In this way, dams can reduce temperature variation from summertime cold fronts and delay the natural cooling that takes place in the late summer-early fall, thereby potentially harming summer and late summer-fall salmonid migration runs;
- Reservoirs can inundate alluvial river segments, thereby diminishing the groundwater exchange between the river and the riverbed (i.e., hyporheic flow) that cools the river and provides cold water refugia during the summer; and
- Dams can significantly reduce the river flow rate, thereby causing juvenile migrants to be exposed to high temperatures for a much longer time than they would under a natural flow regime.

We note that the EPA has developed a methodology to help identify cold-water refugia within riverine landscapes and this may be a good resource during EIS development.[6]

Total dissolved gas

Given the potential for elevated levels of total dissolved gas to harm fish, we recommend that the EIS consider measures to reduce high levels of TDG. We support the Corps' inclusion of the following methods for reducing TDG levels in the scoping informational brochure and recommend the EIS evaluate the each of the alternatives relative ability to effectively implement TDG impact reduction methods, including but not limited to the following:

- Discharging water through the powerhouse to reduce/dilute the TDG generated from use of the spillways or regulating outlets;

[6] Torgersen et al. 2012. Primer for Identifying Cold-Water Refuges to Protect and Restore Thermal Diversity in Riverine Landscapes. EPA 910-C-12-001

- Under high flows, distributing the discharge over as many spillways as possible with a uniform pattern, rather than putting all discharge through one bay; and
- Understanding that TDG generated at the high-head peaking projects may be reduced when passed through the downstream re-regulating dam. Using the powerhouse to further reduce/limit TDG from being passed downstream, unless maintenance limits turbine use. Whenever possible, timing maintenance to be least harmful to fish listed as threatened or endangered under the Endangered Species Act downstream of the projects.

Sediment

We recommend the EIS describe the alternatives' effects on sediment loads in the reservoirs, including sediment characteristics and location, and, transport of sediment throughout the affected watershed. Sediment analysis should include assessment of physical characteristics (e.g., grain size) and chemical characteristics (e.g., contaminants).

Aquatic Resources, Wetlands and Riparian Areas

The Clean Water Act Section 404(b)(1) Guidelines are applicable to the specification of disposal sites for discharges of dredged or fill material into waters of the United States through the civil works program of the U.S. Army Corps of Engineers.[7] The Guidelines are the substantive environmental criteria used to review proposed discharges of dredged or fill material into navigable waters inside the territorial sea baseline, and proposed discharges of fill material into the territorial sea.[8] Though no Clean Water Act 404 permit is issued for discharges associated with Corps civil works projects, we recommend that the administrative record for the project demonstrate and document compliance with the Guidelines.

Under the Section 404(b)(1) Guidelines, "no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences."[9] Identification of the Least Environmentally Damaging Practicable Alternative (LEDPA) is achieved by performing an alternatives analysis that estimates the direct, secondary, and cumulative impacts to jurisdictional waters resulting from each alternative considered. Project alternatives that are not practicable and do not meet the project purpose are eliminated from the analysis. An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in the context of the overall project purpose.[10] The administrative record should be sufficiently detailed to identify the LEDPA.

Under the Section 404(b)(1) Guidelines, discharges of dredged or fill material are not permitted if they will cause or contribute to significant degradation of the waters of the United States.[11] The potential for significant degradation is evaluated through multiple factual determinations that assess the severity of direct, secondary, and cumulative impacts.

The Guidelines establish specific approaches to evaluate effects on:

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[7] 40 C.F.R. § 230.2(a)(2)
[8] 40 C.F.R. § 230.2(b)
[9] 40 C.F.R. § 230.10(a)
[10] 40 C.F.R. § 230.10(a)(2)
[11] 40 C.F.R. § 230.10(c)

- human health or welfare, including but not limited to effects on municipal water supplies, plankton, fish, shellfish, wildlife, and special aquatic sites;
- the life stages of aquatic life, other wildlife dependent on aquatic environment including the transfer, concentration, and spread of pollutants or their byproducts outside of the disposal site through biological, physical, and chemical processes;
- aquatic ecosystem diversity, productivity and stability. Such effects may include, but are not limited to, loss of fish and wildlife habitat or loss of the capacity of a wetland to assimilate nutrients, purify water, or reduce wave energy; and
- recreational, aesthetic, and economic values.

Geomorphology and Hydrologic Connectivity

We recommend that the EIS discuss, and – the extent possible – estimate, the potential for reduced ecosystem functions from a potentially less dynamic floodplain downstream. Consider for example, the alternatives' influence on future side-channel habitat and organic material/nutrient transport.

Tribal Interests

To demonstrate consistency with Executive Order 13175 - Consultation and Coordination with Indian Tribal Governments, we recommend the EIS include information on tribal consultation. We recommend describing tribal consultation in terms of four general phases: identifying affected tribes, notification, tribal input, and follow-up.

Public Involvement

The EIS should show evidence that the basic steps for effective public involvement have been taken. These steps include the following:

- Plan and budget for public involvement activities;
- Identify the interested and affected public;
- Consider providing technical or financial assistance to the public to facilitate involvement;
- Provide information and outreach to the public;
- Conduct public consultation and involvement activities;
- Review and use input and provide feedback to the public; and
- Evaluate public involvement activities

For more information, we recommend resources from the International Association for Public Participation.[12]

Air Quality

We recommend the EIS evaluate and disclose the following air quality related topics:

- Air quality implications from power production. Each alternative will fit differently into the energy production portfolio of the Northwest. The EIS should consider the emissions associated

[12] Accessed online 6/25/19: http://www.lap2.org/

with the various configurations, and articulate assumptions about how and from where power would be sourced in the absence of hydropower production;
- Air quality implications from transportation;
- Air emissions associated with maintenance dredging operations at the dams; and
- Air emissions associated with internal combustion engines used in conjunction with operation and maintenance.

Changes in Climate

We recommend that the EIS include a discussion of reasonably foreseeable effects that changes in the climate may have on the proposed project and the project area, including its effects on long-term infrastructure. Such an analysis could help inform the development of measures to improve the resiliency of the proposed project. If projected climatic changes could notably exacerbate the environmental impacts of the project, EPA recommends these impacts also be considered as part of the NEPA analysis.

Environmental Justice

The EPA has developed a website with considerations and key references for environmental justice and the NEPA.[13] We encourage your use of this website and note Section VIII, Disproportionately High and Adverse Impacts, in the March 2016 Report of the Federal Interagency Working Group on Environmental Justice and NEPA Committee, "Promising Practices for EJ Methodologies in NEPA Reviews."[14] We further highlight use of the following conditions[15] to help in the consideration of whether the project may contribute to adverse and disproportionate impacts to minority and low-income populations:.

- Exposure
    - exposure by minority populations and low-income populations to an environmental hazard that appreciably exceeds or is likely to appreciably exceed the risk or rate to the appropriate comparison group;
- Human health or environmental impact
    - to minority populations and low-income populations is above generally accepted norms;[16]
    - to minority populations and low-income populations exceeds or is likely to appreciably exceed the impact to an appropriate comparison group;
    - predominantly borne by minority populations or low-income populations;
    - occurs in minority populations and low-income populations affected by cumulative or multiple adverse exposures from environmental hazards; and
    - to minority populations and low-income populations is significant and adverse.

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[13] Accessed online 6/24/19 at: https://www.epa.gov/environmentaljustice/environmental-justice-and-national-environmental-policy-act

[14] Accessed online 6/21/19 at: https://www.epa.gov/sites/production/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

[15] Quoted from p. 45-46 of the Promising Practices report. Accessed online 6/24/19 at: https://www.epa.gov/sites/production/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

[16] 'Generally accepted norms' is used in "Appendix A, Text of Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, Annotated with Proposed Guidance on Terms" which is attached to CEQ's Environmental Justice Guidance Under the National Environmental Policy Act (1997).

Ecosystem Services

Salmon produce highly valued food products harvested in various commercial, subsistence, and personal-use fisheries across the North Pacific. Salmon are also a principle focus of the spiritual and cultural lives of diverse native communities throughout the planning area. Salmon and steelhead also provide many ecosystem supporting services. Salmon are the principal food item of many terrestrial and marine species and a source of marine-derived nutrients to lakes and streams. They also act as watershed engineers that structure streambed habitats and alter sediment composition during spawning. We recommend that these services be acknowledged in the EIS, accounted for using quantitative (where feasible) or qualitative means, and fully considered in decision making.

We encourage the assessment and integration of ecosystem services into agency decision making and that discussion in the EIS include the following elements:

- Identify and classify key ecosystem services in the location of interest, i.e., the affected environment;
- Assess the impact of the Federal action on ecosystem services relative to baseline;
- Assess the effect of the changes in ecosystem services associated with the Federal action; and
- Integrate ecosystem services analyses into decision making.

Cumulative Effects

Cumulative impacts result when the effects of an action are added to other effects on a resource at a place and within a time. The combination of these effects, and any resulting environmental degradation, should be the focus of the cumulative impact analysis. While impacts can be differentiated by direct, indirect, and cumulative, the concept of cumulative impacts accounts for all relevant disturbances since cumulative impacts result from compounding the effects of actions over time. Resources, ecosystems and communities should be characterized in terms of their response to change and capacity to withstand stresses. We recommend focusing on resources that are "at risk" or have the potential to be significantly impacted by the proposed project.

We recommend the EIS delineate and explain the reasoning behind geographic boundary decisions. We recommend using natural ecological boundaries to the extent possible. For example, for cumulative wetland impacts, a natural boundary such as a watershed or sub-watershed could be identified for the spatial scope, although an analysis at multiple geographic scales may also be appropriate. The EIS should also include a determination and explanation for the analyses' temporal scope. Trend data, where available, should be used to establish a baseline for the affected resources, project a reasonably foreseeable cumulative baseline for the affected resources, and to predict the environmental effects of the project when added to this baseline.

The EPA's Consideration of Cumulative Impacts in EPA Review of NEPA Documents provides guidance on the assessment of cumulative impacts.[17] The guidance states that to assess the adequacy of the cumulative impacts assessment, five key areas should be considered. In our review of the Draft EIS, we will assess whether the cumulative effects analysis adequately:

- identifies resources, if any, that are being cumulatively impacted

[17] Accessed online 6/21/19 at: https://www.epa.gov/sites/production/files/2014-08/documents/cumulative.pdf

- determines the appropriate geographic (within natural ecological boundaries) area and the time-period over which the effects have occurred and will occur
- looks at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern
- describes a benchmark or baseline
- includes scientifically defensible threshold levels

Level of Impact Indicators

To focus analysis on potentially significant environmental impacts, we suggest that it is helpful to utilize project-specific thresholds for level of impact. These thresholds can be applied to the EIS's analysis of environmental impacts. This style of analysis can be an effective strategy for meeting the intent of the Council on Environmental Quality NEPA regulations found at 40 CFR Part 1502.

We note that Washington State's Chehalis Basic Strategy SEPA Draft EIS Appendix I provides a potentially useful example of adverse long-term impact indicators.[18]

[18] Accessed online 6/14/19 at: http://chehalisbasinstrategy.com/wp-content/uploads/2016/09/Appendix-I-Adverse-Long-term-Impact-Indicators.pdf

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June 28, 2019

Colonel Aaron L. Dorf
Commander and District Engineer of the Portland District
U.S. Army Corps of Engineers, CENWP-PME-E
P.O. Box 2946
Portland, OR 97208-2946

RE: National Environmental Policy Act Scoping for the Willamette River System Operations Environmental Impact Statement

Dear Colonel Aaron L. Dorf:

The Columbia River Inter-Tribal Fish Commission (CRITFC) hereby responds to your solicitation for scoping comments on development of the Willamette River System Operations (WRSO) environmental impact statement (EIS).

CRITFC was created by and provides technical and policy coordination services to the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes and Bands of the Yakama Nation, and the Nez Perce Tribe. These four tribes possess rights they reserved by treaties with the federal government to take a fair share of those fish destined to pass their usual and accustomed fishing places in the interior Columbia River basin and its tributaries. Inherent in the right to take fish is the conservation and protection of the fishery resource. These reserved rights are not geographically limited to lands ceded to the United States. *See e.g., Seufert Bros. vs. United States,* 249 U.S. 194, *State v James,* 72 Wn.2d 746, 435 P.2d 521 (1967).

The treaties between the federal government and tribes create a federal trust responsibility under which the federal government maintains an affirmative obligation to safeguard the subject matter of federal treaties. Thus, federal agencies must use their authorities in a manner that will protect and enhance – not degrade – the fish species that underlie treaty fishing rights. This duty does not cease once a fish run becomes viable.

The *U.S. v. Oregon* and *U.S. v. Washington* cases also affirmed that Northwest tribes, by virtue of their treaties with the U.S. government, have co-management status on fisheries resources. In reserving the right to fish at all usual and accustomed places, tribes retained their authority to regulate the tribal fishery. State and federal government co-managers are therefore required to have meaningful consultation on actions that affect the treaty-protected fisheries resources. These actions include non-tribal fisheries, hatchery production, protection of the natural spawning environment, and protection on the downstream and upstream migration through the river.

At the direction and on behalf of its member tribes, CRITFC offers the following comments to help identify actions to be included in the suite of programmatic alternatives to avoid and minimize impacts on the tribal fishery resource and issues that must be considered in the impact analysis of those alternatives.

Cumulative Impact Requirement

The National Environmental Policy Act (NEPA) requires federal agencies to look at the cumulative impact of their action. 40 C.F.R. § 1508.25, 40 C.F.R.§1508.27.

> Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 CFR § 1508.7 2019.

The U.S. Army Corps of Engineers (USACE) needs to look at the cumulative impact of this and other on-going projects in the Willamette Basin to satisfy NEPA requirements. Since impacts to Pacific lamprey were not assessed in the current Willamette Basin Water Reallocation Environmental Assessment (EA), that project should be suspended and instead be subsumed into this EIS to fully address the effects of storage allocation and operations on lamprey and other aquatic species. The storage allocation and operations decisions are thoroughly intertwined and, currently, the Willamette Basin Water Reallocation EA is in violation of CEQ requirements by not evaluating the cumulative impact on lamprey.

An EIS for the Willamette Basin Water Reallocation Project is needed to better understand the impacts of that action, particularly on Pacific lamprey that are not even mentioned in that EA. Additional planning at the state level is needed before the federal approval of either storage allocation or storage operations decisions. The two matters should be considered together since operational limitations will affect storage allocation and vice versa. The EA is clear that allocation and operations affect one another. What is not clear is how these effects will occur and how they will be managed.

At the State level the unknowns of how enforcement will work, when and where the water will be drawn from, distribution of the drought plan, and distribution of instream flows is also unclear. There is the uncertainty of how the implementation of instream flow protections for fish and wildlife will work. Incorporating this project into the Willamette River System Operations EIS would present the opportunity to address the mitigation needs for lamprey and the opportunity to satisfy NEPA's cumulative impacts requirements.

Pacific Lamprey

Since 2008, the Columbia Basin Fish Accords lamprey projects, with guidance from the Tribal Pacific Lamprey Restoration Plan, have worked to address a variety of issues for Pacific lamprey in the Columbia Basin (CBFWA 2005; USFWS 2011; CRITFC 2011) including improving mainstem and tributary passage, providing regional abundance and distribution information, conducting

supplementation research (e.g. adult translocation and artificial propagation), describing lamprey population substructure, identifying high-value habitat types (e.g. migration, spawning, and rearing), providing tributary escapement estimates, and guiding contaminant and water quality research.

One of our greatest concerns is the impact the project will have on the Pacific lamprey in the Willamette Valley. Lamprey provide an important source of food for the tribes in the basin. The Commission's member tribes have harvested lamprey at Willamette Falls for millennia. Due to the near extirpation of lamprey in many locations within the Columbia River Basin upstream of dams and impediments to passage, Willamette Falls is one of the few remaining traditional harvest locations for the CRITFC member tribes. The cultural and traditional significance of Willamette Falls can not be overstated to maintaining ties to Pacific lamprey and providing lamprey for subsistence and ceremonial purposes. Some of the work CRITFC and its member tribes have conducted to conserve Willamette Basin lamprey populations can be found in The Tribal Pacific Lamprey Restoration Plan for the Columbia River Basin.[1] The Willamette Basin is one of the most prominent habitats for lamprey, with Willamette Falls as a significant historical fishing site. Additionally, within the basin, the largest proportion of lamprey in the Willamette Basin inhabit the Santiam River, a tributary that will be affected by this project. Diminished in the Columbia River, the Willamette is one of the last few basins for lamprey to thrive. It's also important to add that there has been a number of restoration projects done for the lamprey in the basin and without enough flow they may be all for naught.

There is ample information that can be considered about lamprey populations in USACE's study effort. Chapter 13 of the USFWS' Lamprey Assessment is dedicated to lamprey populations in the Willamette Valley and states:

> Water diversions and impoundments alter the quantity and timing of flow events, which may impact adult and juvenile lamprey migration cues, decrease spawning habitat availability, prevent access to backwater or side channel habitats, create low water barriers, and contribute to mortality if incubating eggs or burrowing larvae are dewatered or exposed to a high temperature or low oxygen environment (Clemens et al. 2017b). Some improvements to flow regimes have occurred in the Willamette Basin.[2]

Improving the passage environment for Pacific lamprey, at all life history stages, remains the highest priority for restoration within the Willamette Basin.

- *Improvements to passage by adult lamprey:* Increase focus on addressing known adult lamprey passage bottlenecks in fishway sections that are upstream of entrances (i.e. transition pools, serpentine weirs). Evaluation of historic telemetry data suggests this will enhance likelihood of improving overall dam passage efficiency and conversion to upriver dams (Keefer et al. 2013).
- *Development of alternative forms of passage:* Efforts to develop and improve alternative forms of passage should continue in parallel with passage improvements. This would include

[1] https://critfc.org/wp-content/uploads/2012/12/lamprey_plan.pdf.
[2] https://www.fws.gov/pacificlamprey/Documents/PacificLamprey_2018Assessment_final_02282019.pdf at page 165.

expansion of adult translocation efforts that aim to bypass the difficult migration corridor and release adults into high-value spawning habitat in strategic locations within the Willamette Basin.

- *Implementation of RM&E plan for larval/juvenile lamprey:* Strongly consider multiple approaches (e.g. PIT and acoustic tagging) to inform management decisions regarding juvenile lamprey passage improvements, in addition to the current strategy of developing a juvenile lamprey acoustic transmitter.

Pacific lamprey migration timing is influenced by a number of factors including water temperature and flow (Clemens et al. 2011, 2012). As temperatures increased, lamprey were observed holding overwinter in the mainstem Willamette River prior to resuming the spawning migration the following spring (Clemens et al. 2012). Testicular atresia of male lamprey has been observed in lamprey collected at Willamette Falls when temperatures exceeded 20°C. Lamprey may also respond to chemical cues from larval lamprey to guide their spawning migrations (Moser et al. 2015). Thus it is important that habitat and water quantity and quality are maintained in upstream tributaries where larval lamprey are observed to reside.

Water Quality

Another concern is how changes in Willamette River System Operations will affect water quality in the Willamette Basin. Shifting water flow will affect the water quality of the basin from dilution of pollutants to affecting water temperature and availability of dissolved oxygen for aquatic species. The quality of water disproportionately impacts juvenile lamprey, which spend up to seven years filter feeding in the silt and gravel of stream beds, making them particularly susceptible to toxics that settle in and out of the water. ESA-listed steelhead and chinook salmon are also vulnerable to water quality degradation and rely on flow objectives to dilute concentrations of toxics from municipalities, industry, and agricultural runoff.

Climate Change

Thoroughly considering the likely effects of climate change is essential to an accurate Willamette River System Operation EIS. Climate change was not thoroughly taken into consideration in the Willamette River Basin EA, which provides this EIS an opportunity to assess the impacts to the Willamete River Basin. The EIS should contend with the possibility that reservoirs may not adequately fill since tributaries, such as the North Santiam, are snowpack driven, which may be affected by climate change differently than rain-driven tributaries. Additionally, climate change will affect the local flows, including timing of flows, that are relied upon in the data to meet the BiOp objectives. The temperature of the water will also be affected by climate change and lamprey, steelhead and chinook salmon may require more live flow to keep Willamette tributaries at a habitable temperature. Overall, the inevitability of climate change impacts must be factored into this EIS.

Adequate Flows for Fish and Wildlife

Perhaps the greatest concern is that there is not enough live flow to sustain fish and wildlife to meet BiOp requirements year-round. Models from the Willamette River Reallocation EA show that BiOp

flow requirements are not consistently met, and in years of deficit and insufficient water availability, they are missed significantly. It would be wrong to assume that a water allocation decision in an EA that does not mention lamprey will in anyway override the needs of this species.

Tribal Cultural Resources

Archaeological and cultural sites are the evidence tribes and tribal members have to connect themselves to the past of their tribe and their ancestors. The National Historic Preservation Act recognizes historic properties of religious and cultural significance to tribes, 54 USC § 302706(a), those sites that may not have an archaeological component but possess deep tribal connections through use from time immemorial. Sometimes they are called Traditional Cultural Properties, however TCPs can be recognized for any cultural group whereas historic properties of religious and cultural significance can only be recognized relating to tribes. The Archaeological Resources Protection Act also recognizes these areas as sites that have religious or cultural importance, 16 USC § 470cc. These sites are often related to the gathering of the First Foods, those foods tribes have relied upon for their survival since the beginning of time and have deep cultural meanings. Hunting, fishing, gathering, and other cultural sites contribute to and connect the tribes to their homelands and their cultures which are based on this place.

The interests of tribes in the protection of cultural resources associated with the Willamette River are not limited to the information contained in the archaeological sites. Salmon and lamprey are tribal cultural resources that play an integral part of tribal religion, culture, and physical sustenance. Salmon and lamprey shaped the lives of the people who have lived here since time immemorial. The cultures, intertribal interactions, fishing technologies, and very religions of the Pacific Northwest tribes were all impacted and influenced by salmon and lamprey. These fish have been an important part of the economies of the region for thousands of years, from the ancient Indian trade routes to modern commercial fishing.

Specifically, salmon also play an important role in the ecosystem of the region, returning ocean nutrients to the rivers and streams where they were born, feeding wildlife and even the forests with their bodies. *Wy-Kan-Ush-Mi Wa-Kish-Wit,* the salmon's spirit, is sacred life. The salmon was provided a perfect world in which to thrive. For thousands of years the salmon unselfishly gave of itself for the physical and spiritual sustenance of humans.[3]

USACE will need to work closely with the member tribes of CRITFC and their cultural resources departments during their analysis of cultural resources. CRITFC may be able to assist in coordination with the tribes.

Hydro System Operations

The EIS should consider a range of system operations and improvements with the goal of improving fish passage and maximizing system survival. Alternatives should include the following operation changes:

[3] http://plan.critfc.org/2013/spirit-of-the-salmon-plan/about-spirit-of-the-salmon/.

- A spill/flow program optimized for salmon survival under existing water quality waivers; set spill/flow at optimal levels based on individual project characteristics to maximize juvenile survival. Such spill may be greater than current spill, but may not necessarily require spill to the gas caps.
- Modified reservoir operating elevations at specific projects for either permanent drawdown or seasonal drawdown.
- Use spill/flow operations during the summer to deal with downstream water quality issues.
- Altered flood control operations in low- and mid-range water years to guarantee flows downstream of projects.

Hydro System Structural Modifications

Alternatives reviewed under the EIS should include structural modifications to again improve fish passage and system survival. The modifications for lamprey passage measures discussed above should be considered.

- Install additional temperature structures at appropriate projects to reduce summertime thermal issues.
- Install surface passage structures/collectors at designated projects such as outlined at Detroit and Cougar dams.
- Improve adult passage at existing ladders. Add trap-and-haul facilities if adult ladders are infeasible or not cost-effective options
- Evaluate different smolt transport options of trucking or long distance piping to move fish around dams.

Off-site Mitigation

Inclusion of mitigation actions, such as those implemented through actions in the estuary and tributaries, as well as hatchery actions, is a requirement of the Northwest Power Act and must be included as part of the WRSO action so long as there are dams on the rivers; there is no system operation alternative that can alleviate the mitigation requirement. The alternatives in the EIS must therefore include an appropriate suite of tributary and estuary mitigation actions.

Mitigation funding plays a significant role in the economics of interior basin communities. Therefore, when analyzing the effects of tributary actions, the agencies will need to include analysis of the socio-economic benefit that mitigation funded tributary actions have on local communities, both tribal and non-tribal, and how those benefits change under the various alternatives.

Reservoir Ecology

The EIS will need to consider the effects of the existence and operation of the federal hydropower system on reservoir ecology. Before the dams, the Willamette River was just that – a river of free flowing water. The Willamette River system has turned these rivers into a system of connected reservoirs, bringing with it changes to the natural ecological river system, including invasive species, algae, seaweed, altered flood dynamics, sequestration of sediment, sand bars, water quality issues, and changes in temperature, to name a few. The WRSO EIS will need to evaluate the change in reservoir ecology associated with each alternative and how these changes affect fish and wildlife

resources. We encourage the agencies to consider alternative actions – including system operation and restoration actions – to address reservoir ecology and its impacts on the fishery resource.

Data and Metrics

The EIS should review and include a range of fish metrics and data, including project survival, reach survival, and delayed mortality. Alternative development and analysis in the EIS should consider at least reach, project, and SAR survival metrics. In addition to these metrics, the analysis should look to using various models and tools and not be completely dependent on the COMPASS model.

Conclusion

Thank you for the opportunity to comment. We look forward to working with USACE in carrying out the WRSO EIS processes.

Executive Director

WaterWatch of Oregon
Protecting Natural Flows in Oregon Rivers

June 27, 2019

VIA EMAIL

U.S. Army Corps of Engineers, CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946
Email: willamette.eis@usace.army.mil

Re: Willamette Valley System Evaluation EIS

Dear Ms. Hill:

WaterWatch of Oregon ("WaterWatch") is a nonprofit river conservation organization dedicated to protecting and restoring streamflow in Oregon for the benefit of fish, wildlife and people who depend on healthy rivers. Thank you for the chance to comment in the "scoping" phase of the above evaluation. We expect to join with a number of other conservation groups in submitting joint comments. We submit these brief additional comments to emphasize certain points and to make some additional comments that may be unique to our perspective.

1. Relationship to Willamette Basin Review. The so-called Willamette Basin Review (WBR) to "reallocate" storage space in reservoirs managed by the Corps should be delayed and merged into this process for further consideration. It does not make sense to allocate storage space in the reservoirs now when the Corps is about to embark on a comprehensive environmental review of the Willamette Valley Project (WVP) and when the National Marine Fisheries Service (NMFS) is about to prepare a new Biological Opinion regarding impacts of the WVP on salmon and steelhead listed as threatened under the federal Endangered Species Act (ESA). The anticipated additional analysis is almost certain to better inform how reservoir storage capacity should be allocated and managed. Reallocation should wait for that new information and analysis. The additional delay would be minimal relative to the overall timeline for reallocation (including time already invested) and could be used to implement important actions in anticipation of reallocation, such as creation of mechanisms to protect stored water released for fish from downstream diversions. Allowing reservoir reallocation to proceed on a separate and prior track also would represent an irreversible and irretrievable commitment of resources foreclosing formulation and/or implementation of reasonable and prudent alternatives

to be developed in the re-consultation with NMFS, which would violate a rule for implementing the ESA.

2. Species Considered. The system evaluation should consider impacts of the WVP on all specifies of fish, wildlife and plants, not just those already in trouble and therefore listed as threatened under the ESA. Operation of the WVP clearly impacts threatened Upper Willamette River Winter Steelhead and Upper Willamette River Spring Chinook. It also affects numerous other species, including cutthroat trout, Coho salmon (thought to be non-native to the area above Willamette falls but now naturally producing), lamprey, various species of amphibians and numerous species of plants. The National Environmental Policy Act (NEPA) requires consideration of impacts to all species.

3. Flow Modeling. The system analysis should include flow modeling using the most recent flow data and expected future impacts of climate change. (Our understanding is that modeling to date uses a flow dataset ending in 2008 and that a new dataset including flow data through 2018 is, or should soon be, available.) The modeling should evaluate flows under numerous different scenarios for operation of the reservoirs, including operations assuming full contracting of proposed reservoir allocations to agricultural irrigation and municipal and industrial use, and assuming all plausible scenarios for timing of releases to satisfy those contracts and all plausible scenarios for general locations of diversions and return flows.

4. Flow Scenarios. Our understanding is that the WVP has substantially altered flows below the dams relative to historic natural flows – winter and spring flows are reduced to prevent flooding and to store water for summer and fall; and summer and fall flows are increased because stored winter and spring flows are released then for use downstream and to empty the reservoirs for winter storage. The system analysis should examine the extent to which regulated flows could be shifted more toward the historic natural hydrograph and, if so, what impacts that would have – on fish and wildlife as well as flood risk. For example, we understand that summer flows may not be critical for fish and that the primary issue is water temperature for rearing. Thus, the analysis could examine the temperature impacts of reduced summer flows and whether those could be addressed by other means (more shading of a smaller stream channel, for example). Also for example, the EIS should look at the extent to which high winter and spring flows, and the variability of those flows, could be increased without unacceptable risk of harm downstream. This analysis should include an analysis for fish migration and population data to determine whether there is any correlation with variations from expected unregulated flow as opposed to just particular flow levels.

5. Rule Curves. To accommodate consideration of additional flow scenarios, the Corps should be willing to consider modifications to the rule curves for the dams. The rules curves are necessarily based on certain priorities and flow assumptions. The system analysis

should examine those priorities and flow assumptions. Thus, it should also reexamine the rule curves. Doing that would help ensure that a full range of alternatives is considered.

6. FEMA Flood Insurance. The Corps should consider how future flood control needs will be impacted by the 2016 biological opinion of NMFS regarding the Federal Emergency Management Agency's flood insurance program in Oregon. This analysis should be reflected in analysis of potential flow scenarios and rule curves – because flood risks at different flow levels may change in the future if flood insurance policies change.

7. Minimum Storage and Power Pools. The system analysis should evaluate alternatives that do not reserve water in reservoirs for power pools and minimum storage. That could make more water available to meet downstream flow needs and better allow reservoir "drawdown" to aid fish migration.

8. Impacts of Fish Hatcheries. The Corp and its partners fund and/or operate fish hatcheries to make up for impacts of the dams. The potential detrimental impacts of these hatcheries on wild fish and the natural ecosystem should be analyzed along with expected benefits. If the hatcheries are found to have significant negative impacts, proposed alternatives should include measures to prevent those impacts from exceeding benefits.

9. Guidance for Other Regulatory Authority. The system analysis should consider whether the Corps has regulatory authority that could be used to help mitigate for impacts of the Corps' dams in the Willamette Basin. For example, the Corps has regulatory authority over removal from, and fill of, waterways. The Corps should consider whether that authority could be better used to prevent removal-fill activities that exacerbate impacts of the Corps' dams – activities such as new dams (large and small) that block access to fish habitat or detrimentally impact flows and/or water quality. The authority could be used anywhere in the basin, not just on tributaries below the Corps' dams.

10. Protecting Instream Flows. The system analysis should consider alternatives for protecting stream flows for the benefit of fish and wildlife. For example, the Corps could consider transferring portions of its water-storage rights to instream water rights. (Note: this is different from creating instream water rights for the use of stored water.) The system analysis also should consider strategies for protecting stored water released for instream use from being diverted downstream.

11. Impacts of Other Infrastructure. Our understanding is that the WVP included infrastructure in addition to dams to attempt to control flooding – "revetments" and the like. The environmental impact of these structures should be considered in the analysis and proposed

alternatives should consider ways to reduce any detrimental impacts from these structures on fish and wildlife.

12. Impacts of Recreational Fishing. The system analysis should consider impacts of recreational fishing on listed fish and whether the Corps should regulate fishing at its reservoirs and other property in a way that better protects listed fish.

Thank you for considering our comments.

Very truly yours,

Brian Posewitz

Brian Posewitz
Staff Attorney

[Non-DoD Source] Willamette System EIS Public Comment

Chione, Andrew <chionea@oregonstate.edu>

Sat 6/15/2019 4:16 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

To whom it may concern,

Thank you for the opportunity to comment on the EIS for the ACOE project in the Willamette River watershed.

The current operation of the dams run by ACOE in the Willamette Watershed is not working to keep wild, native spring chinook and winter steelhead from plummeting towards extinction.

After the required purpose of flood control, fish conservation should be prioritized with flow management. Consider altering the rule curves to benefit needed flows for ESA-listed fish. Consider more than the minimum required flows for fish, especially in low water years. When the spring chinook spawn, their redds can be dessicated by further reductions in flows. Please reduce the possibility of this happening as much as possible. Consider drawdowns on more reservoirs to flush native, juvenile fish downstream rather than sending them through turbines. Consider using both resevoir drawdowns and fish collectors to preserve the diverse life-history timing of native fish species. With the decline of hydropower value and the dire situation of ESA-listed fish species in the Willamette watershed, native fish conservation should be prioritized over hydropower.

Look into doing habitat mitigation in Willamette tributaries like the Yamhill River that provide habitat for winter steelhead and spring chinook and are not blocked by ACOE operated dams.

Eliminate hatchery production as much as possible to eliminate hatchery fish spawning with wild, native spring chinook and winter steelhead. As an angler, I believe that the best form of fish production is a healthy river. Hatchery fish cannot replace the loss of wild, native fish and only contribute to their decline.

Please coordinate with the relevant state agencies to conduct water quality sampling on reservoirs in the Willamette system, especially those that have drinking water intakes downstream. The water crisis in Salem last year should be a wake-up call to better monitor cyanobacteria blooms for public safety.

Sincerely,

Andrew Chione
Corvallis, OR

[Non-DoD Source] Willamette Valley System Environmental Impact Statement

Arne Goddik <goddik@frontier.com>

Mon 6/10/2019 2:30 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

Dear Envt Resources Specialist Hill,

Thank you for the opportunity to comment on the Willamette Valley System Evaluation. I am a farmer in the Willamette Valley, and am writing to express the importance of continuing to maintain the system for flood control and irrigation storage.

We had about 20 acres of farm land flooded this year, and we had about 5 acres of crops die from being under water for to long.

These dams are critical to protecting farms, homes, and communities from growing flood risk, and we all saw first-hand this spring the impact releases from the dams can have on communities. We need to ensure that the dams retain their primary function of flood control, and that any adjustments made to system operations don't reduce or alter flood mitigation capacity.

Similarly, I oppose reducing the water storage capacity behind the dams. This water is critical for future irrigation and community needs, particularly as we trend toward having longer, hotter summers.

Thank you for the opportunity to comment.

Sincerely,

Arne Goddik
18265 SE Neck Rd
Dayton, OR 97114
goddik@frontier.com

June 28, 2019

Col. Aaron L. Dorf
U.S. Army Corps of Engineers, Portland District
P.O. Box 2946
Attn: CENWP-PME-E
Portland, OR 97208
Comments submitted via email to: willamette.eis@usace.army.mil

Re: Notice of Intent to Prepare and Environmental Impact Statement for the Willamette Valley System Operations and Maintenance (84 FR 12237)

Dear Col. Dorf,

On behalf of the undersigned groups, we are submitting these comments for consideration in the development of the Environmental Impact Statement (EIS) for continued operation and maintenance of the Willamette Valley System (WVS) in the Willamette River watershed. The U.S. Army Corps of Engineers (USACE) is required by law to meet obligations under the Endangered Species Act (ESA) to ensure that the operation of the WVS does not jeopardize listed species. We request that the EIS consider not only the survival of ESA-listed salmon in the Willamette Valley, but also endangered species that depend on those salmon as a vital prey source, specifically the Southern Resident killer whale (orca) population.

Section 7(a)(2) of the ESA requires federal agencies to "insure that any action authorized, funded, or carried out by such agency . . . is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the adverse modification of habitat of such species . . . determined . . . to be critical . . . ." 16 U.S.C. § 1536(a)(2); 50 C.F.R. § 402.14(a). To accomplish this goal, agencies must consult with the National Marine Fisheries Service (NMFS) or the U.S. Fish and Wildlife Service (FWS), depending on the species at issue, whenever their actions "may affect" a listed species. 16 U.S.C. § 1536(a)(2); 50 C.F.R. § 402.14(a).

Consultation with NMFS regarding the effects of WVS operations and maintenance will provide vital information to inform the USACE's final decisions. A thorough review of the best available science on Southern Resident orcas, protected salmon, and any other affected species is vital to determine, for example, whether the proposed operations and maintenance should be modified and mitigated.

The Southern Resident orca Distinct Population Segment (DPS) has been listed as endangered under the ESA since 2005 and Canada's Species at Risk Act (SARA) since 2003[1]. This community of orcas is genetically distinct from all other orca populations, does not interbreed and rarely interacts with other orcas, and is the only ESA-listed orca population. They are part of the fish-obligate "Resident" ecotype, and rely almost exclusively on salmon as their primary prey[2]. They are the only Resident population to inhabit the California Current ecosystem and frequent the outer coasts of Washington, Oregon, and

[1] National Marine Fisheries Service, Endangered Status for Southern Resident killer whales. 70 FR 69903; DFO (Fisheries and Oceans Canada). Fisheries and Oceans Canada. *Action Plan for the Northern and Southern Resident Killer Whale (Orcinus orca) in Canada*. Species at Risk Act Action Plan Series. (Fisheries and Oceans Canada, Ottawa, 2017)
[2] *Ibid.*; Foote, A. D.et al.Genome-culture coevolution promotes rapid divergence of killer whale ecotypes.Nat. Commun.7:11693 doi: 10.1038/ncomms11693(2016)

Northern California[3]. Despite the research and conservation efforts initiated after their ESA listing, the Southern Residents have continued to decline and now number just 74 individuals, their lowest population abundance in over 30 years (this does not include the two new calves observed in the population since December 2018)[4]. The National Marine Fisheries Service has recognized them as one of eight marine species most at risk of extinction, and considers them a recovery priority #1: "a species whose extinction is almost certain in the immediate future because of a rapid population decline or habitat destruction."[5]

The top threats to their survival and recovery have been identified as prey depletion – particularly of their primary prey, Chinook salmon – toxic contamination, vessel effects, and increasing levels of ocean noise[6]. The Southern Resident orcas have survived on the Pacific Northwest's abundant salmon for millennia, but as salmon have declined throughout the region, the orcas have suffered from a lack of available prey. Research has established that Chinook comprises the majority – up to 79% – of the Southern Residents' diet in the summer months[7], when they historically inhabit the inland waters of the Salish Sea between Washington and British Columbia. Coho and chum salmon are also seasonally important to Southern Resident orcas, and their diet appears to diversify and include greater amounts of these types of salmon during offshore coastal foraging periods in the winter and spring[8].

A multi-year tagging and vessel-based survey project tracking the Southern Resident DPS in their coastal habitat established the coastal presence of the orcas, and collected prey and scat samples; analysis from these samples indicate that the orcas continue to target Chinook salmon in their coastal range, and consume fish from major watersheds including the Columbia Basin[9]. Mortality and birth rates are correlated with coast-wide salmon abundance[10], and a high rate of pregnancy failure in the population has been linked to nutritional stress, with nearly 70% of detected pregnancies ultimately unsuccessful, severely impacting the Southern Resident orcas' ability to recover[11]. The NMFS 2008 Recovery Plan for

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[3] Krahn, M.M. et al. 2004. 2004 status review of southern resident killer whales (Orcinus orca) under the Endangered Species Act. NOAA Technical Memorandum NMFS-NWFSC-62, U.S. Department of Commerce, Seattle, Washington; Reynolds, J.E. H. Marsh & T.J. Ragen. 2009. Marine Mammal Conservation. Endangered Species Research. 7:23-28

[4] Population data from Center for Whale Research, www.whaleresearch.com

[5] NOAA Fisheries. Species in the Spotlight: Southern Resident Killer Whale DPS

[6] Fisheries and Oceans Canada. *Action Plan for the Northern and Southern Resident Killer Whale (Orcinus orca) in Canada*. Species at Risk Act Action Plan Series. (Fisheries and Oceans Canada, Ottawa, 2017); National Marine Fisheries Service (NMFS) 2008. Recovery Plan for Southern Resident Killer Whales (*Orcinus orca*). NMFS, Northwest Region, Seattle, Washington; NMFS. 2014. Southern Resident Killer Whales: 10 Years of Research & Conservation

[7] Ford, M.J et al. 2016. Estimation of a Killer Whale (Orcinus orca) Population's Diet Using Sequencing Analysis of DNA from Feces. PLoS ONE 11(1): e0144956. doi:10.1371/journal.pone.0144956; Hanson, M.B. et al. 2010. Species and stock identification of prey consumed by endangered southern resident killer whales in their summer range." Endangered Species Research, 11(1):69-82

[8] NOAA Fisheries Northwest Fisheries Science Center. Distribution and Diet of Southern Resident Killer Whales. Presentation by Brad Hanson, July 2015 Program Review; NMFS. 2014. Southern Resident Killer Whales: 10 Years of Research & Conservation

[9] NOAA Fisheries. 2014. Southern Resident Killer Whales: 10 Years of Research and Conservation.

[10] Ford, J.K.B, G.M. Ellis, and P.F. Olesiuk. 2005. Linking prey and population dynamics: Did food limitation cause recent declines of 'resident' killer whales *(Orcinus orca)* in British Columbia. Fisheries and Oceans; Ford J.K.B et al. 2010b. Linking killer whale survival and prey abundance: food limitation in the oceans' apex predator? Biology Letters 6: 139–142; Ward E.J, E.E. Holmes, and K.C. Balcomb. 2009. Quantifying the effects of prey abundance on killer whale reproduction. *Journal of Applied Ecology*, 46: 632–640

[11] Wasser S.K. et al. 2017. Population growth is limited by nutritional impacts on pregnancy success in endangered Southern Resident killer whales (*Orcinus orca*). *PLoS ONE* 12(6): e0179824 https://doi.org/10.1371/journal.pone.0179824

the Southern Resident DPS notes that "[p]erhaps the single greatest change in food availability for resident killer whales since the late 1800s has been the decline of salmon in the Columbia River basin."[12]

Salmon from the Willamette River, part of the Columbia Basin, were likely a significant portion of the historical offshore diet of the Southern Resident orcas, and the decline of Willamette spring Chinook undoubtedly contributed to that change in food availability noted by NMFS. A recent review of priority Chinook stocks for the Southern Resident DPS noted the high spatio-temporal overlap of Willamette spring Chinook and Southern Resident orcas (given a rating of 2.25 out of 3)[13]. The return of these Chinook coincides with the presence of Southern Resident orcas off the Washington and Oregon coasts, outside the mouth of the Columbia River, which has been established as a hotspot for the orcas.[14] As noted, the top threat to Southern Resident recovery is a lack of salmon. With so few salmon returning to Pacific Northwest watersheds in recent decades, the decline of Willamette salmon very likely contributes to coastwide prey depletion for Southern Resident orcas.

There is significantly more information available now on the coastal habitat use of Southern Resident orcas, their year-round diet composition, and priority prey stocks. **The EIS should consider the historic abundance of Willamette spring Chinook and the overlap with Southern Resident orcas, and assess the potential for this run of salmon to contribute to overall prey availability for Southern Resident orcas.** Recovering wild salmon populations throughout the range of the orcas will be vital for their immediate survival as well as long-term recovery, including runs such as the Willamette spring Chinook that were historically much more abundant. Any action that significantly impacts salmon needs to also analyze the effects on prey availability for Southern Resident orcas. **The USACE must consider the consequences of maintaining status quo operations in the WVS, which has not led to recovery for Willamette River Chinook and contributes to prey depletion for orcas.**

Salmon populations in the Northwest and California hover at fractions of their historic abundance, on average returning at less than 3% of their historic numbers each year[15]. The development and alteration of salmon-supporting watersheds is one of the primary causes of declining salmon abundance, and efforts to restore habitat simply cannot keep pace with the impacts of urbanization and development in coastal and watershed areas. Pacific salmon have now been extirpated from at least 40% of their historical habitat[16], and spring-run salmon appear to be disproportionately impacted by human use and development of river systems[17]. The wild Upper Willamette spring Chinook evolutionarily significant unit (ESU) has been listed as Threatened under the ESA since 2005[18]. This run is estimated to have a

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[12] National Marine Fisheries Service (NMFS) 2008. Recovery Plan for Southern Resident Killer Whales (*Orcinus orca*), page II-82.
[13] NOAA Fisheries West Coast Region and Washington Department of Fish and Wildlife. 2018. Southern Resident killer whale priority chinook stocks report. Available: https://www.westcoast.fisheries.noaa.gov/publications/protected_species/marine_mammals/killer_whales/recovery/srkw_priority_chinook_stocks_conceptual_model_report___list_22june2018.pdf
[14] Hanson, M. B., E. J. Ward, C. K. Emmons, and M. M. Holt. (2018). *Modeling the occurrence of endangered killer whales near a U.S. Navy Training Range in Washington State using satellite-tag locations to improve acoustic detection data*. Seattle, WA: Northwest Fisheries Science Center.
[15] Lackey, R.T. 2000. Restoring Wild Salmon to the Pacific Northwest: chasing an illusion? pp. 91-145 in "What We Don't Know about Pacific Northwest Fish Runs? An Inquiry into Decision-Making." P. Koss and M. Katz, editors. Portland State University, Portland, Oregon
[16] Levin, P. and M. Schiewe. 2001. Preserving salmon biodiversity. *Am. Sci.* 89, 220-227.
[17] Gustafson, R.S. et al. 2007. Pacific salmon extinctions: Quantifying lost and remaining diversity. *Conserv. Biol.* 21, 1009-1020; Levin, P. and M. Schiewe. 2001. Preserving salmon biodiversity. *Am. Sci.* 89, 220-227.
[18] 70 FR 37160. June 28, 2005.

historic run size of 300,000 salmon annually, now approximately 5,000 wild spring Chinook return each year[19].

The WVS, 13 dams operated by the USACE, is part of a larger system of 25 major dams in the Willamette Basin. These dams block up to 90% of historic, high-quality habitat[20], with no functional fish ladders and extremely limited passage for both returning adults and out-migrating juvenile salmon. Collecting and moving fish is expensive and ineffective, and increases stress and mortality for juvenile salmon. Supplementing wild salmon with hatchery production is simply not sustainable, and has resulted in unexpected impacts to the native wild stock. The USACE has previously agreed to implement structural and operational changes required to benefit wild salmon in the WVS, as described and scheduled in the 2008 Biological Opinion, but has failed to follow the established timeline and has not carried out these necessary actions[21]. **Status quo operations are failing to result in any recovery of the Willamette spring Chinook ESU[22].**

Dams in the Willamette Basin block access to historic habitat, create large reservoirs harboring invasive predators for juvenile salmon, degrade water quality and stream flow, and increase water temperatures in streams and reservoirs – all of which have negative impacts on salmon survival and therefore prey availability for Southern Resident orcas. Changes are necessary to address flow, temperature, and water quality issues, and provide adequate fish passage to the federally-protected, high-quality habitat that is blocked by dams. The EIS should include and analyze alternatives that allow for greater flexibility in hydropower system operations, include more options that benefit wild fish, and prioritize structural changes to help wild fish recover.

Although some dams in the WVS are used for flood control and are critical to human safety, modifications to dam operations can benefit wild salmon while maintaining flood control. Other dams are primarily used for hydropower or recreation, and the USACE must prioritize and analyze operational measures and structural changes that may impact these other authorized purposes in the WVS, but are necessary to recover wild Willamette salmon. Dams such as Dexter and Big Cliff are hydropower re-regulation dams that do not serve flood control purposes. The USACE should include alternatives that consider modifying dams not vital for flood control to operate as run-of-river, or analyze the complete removal of these dams to support the recovery of ESA-listed salmon.

In addition to the duty to ensure against jeopardy, the USACE has an independent duty under ESA section 7(a)(1) to use its authorities to further the purpose of conserving threatened and endangered species. 16 U.S.C. § 1536(a)(1). Measures necessary to fulfill the USACE's duties to further listed species conservation and ensure that activities it authorizes or carries out are not likely to jeopardize the continued existence of those species are set forth in NMFS recovery plans for listed species. The recovery plan for Southern Resident orcas says that "[w]ild salmon have declined primarily due to degradation of aquatic ecosystems resulting from modern land use changes" including hydropower

[19] Consultation on the "Willamette River Basin Flood Control Project" 2008. U.S. Army Corps of Engineers, Bonneville Power Administration, U.S. Bureau of Reclamation, NOAA National Marine Fisheries Service. NWR-2000-2117
[20] *Ibid.*
[21] Consultation on the "Willamette River Basin Flood Control Project" 2008. U.S. Army Corps of Engineers, Bonneville Power Administration, U.S. Bureau of Reclamation, NOAA National Marine Fisheries Service. NWR-2000-2117
[22] NOAA Fisheries. 2016. 5-Year Review: Summary & Evaluation of Upper Willamette River Steelhead, Upper Willamette River Chinook. NMFS West Coast Region, Portland OR.

development[23]. Therefore the USACE should review the recovery plan and use its authorities to rebuild depleted populations of salmon and other prey to ensure an adequate food base for recovery of the Southern Resident orcas.

Southern Resident orcas and Pacific salmon are facing an extinction crisis, and are not recovering after decades of ecosystem-wide changes to the habitats they evolved in. Without swift and immediate action to remedy the impacts of habitat loss and development throughout the range of both of these iconic species, we are at a greater risk than ever of losing them. **The USACE must consider how operations in the WVS impact both Willamette spring Chinook and the Southern Resident DPS, and include alternatives that will make real and significant progress to recovering wild salmon.** We request alternatives that include an expedited implementation timeline for near-term structural and operational changes in addition to longer-term solutions; provide greater flexibility in hydropower system operations; and include a full analysis of changes that give salmon recovery a high priority, including how different alternatives would impact the availability of Chinook salmon for Southern Resident orcas.

Thank you for your consideration of our input, and please do not hesitate to contact Colleen Weiler at Whale and Dolphin Conservation (colleen.weiler@whales.org) with any questions or for additional information.

Regards,

Catherine Kilduff
Senior Attorney
Center for Biological Diversity

Joseph Bogaard
Executive Director
Save our Wild Salmon

Quinn Read
Northwest Program Director
Defenders of Wildlife

Dr. Erin Meyer
Director of Conservation Programs & Partnerships
Seattle Aquarium

Leda Huda
Executive Director
Endangered Species Coalition

Bill Arthur
Director of the Columbia-Snake Salmon Campaign
Sierra Club

Giulia Good-Stefani
Staff Attorney
Natural Resources Defense Council

Colleen Weiler
Jessica Rekos Fellow
Whale and Dolphin Conservation

Howard Garrett
Co-founder & President of the Board
Orca Network

Whitney Neugebauer
Director
Whale Scout

[23] National Marine Fisheries Service (NMFS) 2008. Recovery Plan for Southern Resident Killer Whales (*Orcinus orca*). NMFS, Northwest Region, Seattle, Washington

LONG TOM
WATERSHED COUNCIL

June 27, 2019

To: U.S. Army Corps of Engineers, Portland Region
From: Clinton Begley, Executive Director - Long Tom Watershed Council

As Executive Director of the Long Tom Watershed Council I submit this letter as comment for myself, in my professional capacity, for the purposes of scoping for the Environmental Impact Statement for the Willamette Valley System Operations and Maintenance.

The The Long Tom Watershed Council serves to improve water quality and watershed condition in the Long Tom River basin through education, coordination, consultation, and cooperation among all interests, using the collective wisdom and voluntary action of our community members.

The Long Tom Watershed Council (The Council) works in a unique niche - our voluntary and non-regulatory approach allows us to reflect the values of our watershed through a community of practice to enhance and restore the lands and waters in our shared home. This work depends upon a culture of neighbors-helping-neighbors to work across differences to make this a healthier place for everyone. As such, we work in close partnership with private landowners and public agencies alike in both the Long Tom Watershed, and the main stem of the Willamette River.

This modus operandi is important context to acknowledge both The Council's strengths as a regional participant in this work among partners (including strong and positive partnership with the Army Corps), and also the limitations upon our collective ability to achieve ecological uplift given the initial conditions of anthropogenic hydrologic processes within which we operate.

It is my hope that through the scoping phase of the Willamette Valley Project Environmental Impact Statement, the USACE will consider the following initial conditions and limiting factors to ecological uplift in our service area, and throughout the basin:

- **Invasive species:** while the origins and vectors for non-native invasive species are numerous and manifold, current conditions on some USACE lands in and around Fern Ridge Reservoir (Fisher Butte access for example) are dominated by invasive plant species like reed canary grass. These "anchors" for invasive species limit biodiversity of the surrounding systems and threaten nearby and adjacent work to restore rare wetlands and wet prairie to the detriment of numerous target endangered and threatened aquatic and terrestrial species like streaked horned lark, red legged frog, etc. Invasive species control inclusive of considering the impacts of dam operations upon seasonality of growth and preferential control methods etc. should be considered.
- **Side Channel Reconnection/ Enhancement Opportunities:** In the straightened and shortened channel of the Long Tom river below Fern Ridge dam, numerous historic side channels exist in various states of connectivity to the main channel as a result of how the channel was intentionally designed, deteriorating infrastructure, and/or natural processes. Opportunities exist to improve and restore habitat function in the lower Long Tom, while supporting the flood risk mitigation mission of the Fern Ridge project.

- **Check Dam/ Drop Structure Review:** Below Fern Ridge reservoir, three check dams attenuate the grade of the river to support the function of the straightened channel. These dams are barriers to resident native fish movement throughout the system and into tributaries, as well as to fluvial and anadromous fish from the Willamette. These structures are significant limiting factors to the health of our native fish including coastal cutthroat trout that are year round residents with numerous life histories in the watershed, and juvenile spring Chinook salmon that historically used the Long Tom as important rearing habitat and that are still present seasonally below the downstream most drop-structure in the city of Monroe.
- **Fern Ridge Reservoir Fish Passage:** Disagreement exists about the benefits and drawbacks of providing fish passage around Fern Ridge reservoir. Considerations including the harm in facilitating the movement of non-native fish above dam v.s. the benefits of providing greater connectivity for native species throughout the system is unclear. I would encourage an evaluation of the merits of providing both upstream and downstream fish passage at Fern Ridge.
- **Floodplain Restoration as a Risk Mitigation Opportunity:** I would encourage a thorough evaluation of the opportunities to address critical concerns of flood risk mitigation in balance with the opportunities and complimentary needs for floodplain habitat restoration. The EIS should include taking a critical look at the current paradigm to approaching flood risk management, in contrast with a cutting-edge view of the ecosystem services provided by a healthy and intentionally connected / inundated floodplain, and the efficacy in addressing both missions of flood control and habitat enhancement simultaneously.
- **Ecological Flows:** The Council encourages USACE to examine flow operations that protect infrastructure while balancing water quality and habitat needs for native species.
- **Partnership Funding:** The Corps should, where appropriate, seek to expand the opportunities for public/private partnership to leverage technical expertise and community engagement capacities of local partners, and simplify the process through which local Army Corps staff can direct discretionary funding to address critical needs and capitalize upon partnership opportunities locally.
- **Tribal Engagement & Traditional Ecological Knowledge:** The EIS should evaluate the role of Tribal governments, and indigenous knowledge holders in stewardship. While it is understood that guidelines exist for how and when recognized Tribes must be engaged in consultation for Corps operations and projects, it is less clear what opportunities and mechanisms exist to leverage and support the involvement of Native people in stewardship through public engagement and local contracting. Opportunities to support the efforts of indigenous peoples, through partnerships and support funding, should be evaluated. Specifically, the Corps should explore how its ecological mission for biodiversity and mitigating the impacts of Corps infrastructure can be strengthened through cultural diversity and the knowledge and skills held by Native peoples.

The Council is also a member of the Willamette Mainstem Anchor Habitat Working Group (AHWG), a partnership of 16 Willamette Valley organizations committed to protecting and restoring ecosystem function. The AHWG works to support the vision laid out in the *Willamette Restoration Strategy* (2001). The vision aspires to attain “a dynamic balance between diverse human and ecological needs” and

creating a place where “basin residents can live in healthy watersheds with functioning floodplains and habitats supporting a diversity of native species.”

Each member of the AHWG plays a distinct role in achieving long-term restoration, conservation and stewardship along the historic meander and current channel of the Willamette River and its major tributaries. The AHWG collectively works to sustain and enhance seasonally important resources for native fish. This goal is accomplished, where feasible, through various means such as reforestation of floodplain forests, controlling priority invasive aquatic weeds, reconnecting the river to its floodplain, and enhancing and creating off-channel habitat.

The Long Tom Watershed Council and AHWG have prioritized these activities because they are of ecological importance to economically and culturally significant ESA-listed salmonids and other native fish species of concern. This work also supports improved water quality, retention of floodwaters, and groundwater recharge while supporting habitats for a wide range of aquatic and terrestrial native species critical to the overall health of the Willamette Valley ecosystem. AHWG partners have been working for more than ten years along the Willamette River and its tributaries. It has made significant progress thanks to the collective efforts of agencies, organizations, and individuals. Much work remains and success can only occur with this continued regional collaboration. The Council encourages the USACE to incorporate in its scope evaluation how its operations can support creating a place where “basin resident can live in healthy watersheds with functioning floodplains and habitats supporting a diversity of native species.” There are many competing interests, and it will be incumbent upon the Corps to balance all those interests while maintaining strong, collaborative relationships with its partners.

The Council encourages USACE to examine opportunities in its Willamette Bank Protection Program for revetments to be removed or modified where ecological benefits can be achieved with low risk to infrastructure. Identifying areas where river processes such as erosion and deposition can be restored will increase overall river health. Increasing the extent and duration of floodplain and off-channel habitats helps reduce the intensity, severity, and frequency of flooding, with short and long-term benefits for infrastructure located in harm’s way, and reduced costs to the state and federal governments in the long term. The USACE can also examine how it can develop a process to work with landowners when a revetment fails to determine if alternatives exist to replacement or reinforcement of the existing revetment. Local partners including the Long Tom Watershed Council exist to work with USACE and landowners if these situations arise.

Thank you for the opportunity to lend comment to this important process. Please reach out with any questions you may have.

Sincerely,

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
1201 NE Lloyd Boulevard, Suite 1100
Portland, OR 97232

In response refer to:
WCRO-2018-00782

June 28, 2019

District Engineer
U.S. Army Corps of Engineer District, Portland
Attn: CENWP-PME-E/Suzanne Hill
P.O. Box 2946
Portland, Oregon 97208-2946

Dear Ms. Hill,

NOAA's National Marine Fisheries Service (NMFS) received the public notice seeking public comments on development of the scope of the U.S. Army Corps of Engineers (Corps) Environmental Impact Statement (EIS) to address continued operations and maintenance of the Willamette Valley System (WVS) on April 1, 2019. Thank you for the opportunity to comment.

We have reviewed the supplementary information provided in the public notice, as well as information shared at public meetings and Cooperating Agency meetings within the areas of NMFS responsibility, expertise, and in terms of the impact of proposed actions on trust resources.

NMFS offers comments pursuant to section 305(b)(4)(A) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) and ESA Section 7(a)(1). In 2008, NMFS issued a Biological Opinion (BiOp) for the existing operations of the WVS with a finding of Jeopardy for the Upper Willamette River (UWR) spring-run Chinook salmon (*Oncorhynchus tshawytscha*), and UWR steelhead (*O. mykiss*) (NMFS 2008). The Reasonable and Prudent Alternative (RPA) directed the Action Agencies to implement a series of measures to address the effects of the WVS in order to avoid jeopardizing UWR Chinook salmon and steelhead. While several RPA measures remain incomplete the Corps has reinitiated consultation with NMFS under ESA Section 7, and intends this National Environmental Policy Act (NEPA) process to inform the ESA consultation process.

NMFS supports the timely re-initiation of ESA consultation on the ongoing operations and maintenance of the WVS, and the robust scoping of an EIS for this action that will complement a thorough ESA consultation process. We support the completion of these tasks expediently, as new information since 2008 indicates that the statuses of UWR Chinook salmon and steelhead continue to decline. Any additional delay in implementing critical fish passage and habitat actions associated with the WVS would only prolong this period of elevated extinction risk and potentially make recovery of these species more difficult in the future.

NMFS has two primary comments regarding the WVS EIS NEPA process:

1. The current timeline calls for completion of a record of decision during spring/summer 2023, a four year process. However, Executive Order 13807 (Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure Projects)(August 15, 2017) requires Federal agencies to process environmental reviews and authorization decisions for "major infrastructure projects" as One Federal Decision (OFD) and sets a government-wide goal of reducing, to two years, the average time for each agency to complete the required environmental reviews and authorization decisions for major infrastructure projects, as measured from the date of publication of a notice of intent (NOI) to prepare an environmental impact statement. The NOI to prepare an EIS for WVP operations and management was published on April 1, 2019.

   The OFD process may not directly apply to WVP EIS process because the WVP is not a new major infrastructure project, or for other reasons. Nonetheless, evaluation of operation and maintenance of existing infrastructure appears to be no more difficult than evaluation of new infrastructure due to the nature and volume of information that is already available, including previous NEPA and ESA documents. That timeline is also appropriate considering the urgency called for by the current status of UWR Chinook salmon and steelhead. Therefore, we recommend that the Corps revise the schedule by reducing the timeline for completing the ROD to April 1, 2021, or as near to that date as possible, or explain the circumstances that make the two-year schedule infeasible.

2. The range of reasonable alternatives could be expanded based on the initial description of the scoping process.

   Based on information that has been provided so far, we understand that the 'no action' alternative is planned to presume completion of large fish passage and water quality structures. However, these projects are still in early planning phases and have no allocated funding. We recommend the Corps define their no action alternative using the current status quo and not include these structures that are still being designed and are not currently funded to be built.

   In addition, based on preliminary scoping discussions with the Cooperating Agencies, components of the action alternatives have not yet included consideration of actions in addition to the existing 2008 BiOp RPA requirements. When developing alternatives for the EIS, we encourage the Corps to include a broader range of actions that may reasonably occur, such as elements that may be required by the next BiOp.

   We support the Corps' intention to invite a broad array of suggestions to be included in action alternatives during Cooperating Agency meetings to be held later this summer. To help facilitate early scoping of appropriate alternatives we have provided an attached list of actions in addition to those currently included in the 2008 BiOp RPA, for the Corps to consider while scoping action alternatives.

NMFS appreciates this opportunity to review and provide comments on the range of actions to be analyzed in the EIS for ongoing operations and maintenance of the WVS. Please contact Marc Liverman at 503-231-2336 or via email at Marc.Liverman@noaa.gov if you have any questions concerning this letter, or if you require additional information.

Sincerely,

for -

Kim W. Kratz, Ph.D.
Assistant Regional Administrator
Oregon/Washington Coastal Area Office

cc: Marc Liverman
Shelby Mendez
Chris Fontecchio
Anne Mullan
Kathleen Wells

References

National Marine Fisheries Service (NMFS). 2008. Endangered Species Act Section 7(a)(2) Consultation Biological Opinion & Magnuson-Stevens Fishery Conservation & Management Act Essential Fish Habitat Consultation on the Willamette River Basin Flood Control Project. FINWRl2000/02117, July 11, 2008.

Attachment: NMFS' proposed list of additional actions to be considered as part of action alternatives for EIS scoping of ongoing operations and maintenance of the Willamette Valley System

These actions are in addition to the requirements of the 2008 BiOp RPA, or were included in the RPA but are not currently planned in the Corps' 2015 Configuration and Operations Plan.

North Santiam Subbasin

- Drawdown fish passage operations at Detroit Dam in the spring and fall
- Spill fish passage operations at Detroit Dam in the spring
- Structural improvements at Big Cliff Dam to address TDG

South Santiam Subbasin

- Reintroduction of UWR Chinook and steelhead above Green Peter Dam
- Downstream fish passage structures and operations and Green Peter Dam
- Temperature control structure or operations at Green Peter Dam

South Fork McKenzie Subbasin

- Drawdown fish passage operations at Cougar Dam in the spring and fall

Middle Fork Willamette Subbasin

- Dexter adult fish facility improvements
- Downstream fish passage facility construction at Lookout Point Dam or head of reservoir
- Drawdown or delayed refill fish passage operations at Lookout Point Dam in the spring and fall
- Spill fish passage operations at Lookout Point Dam in the spring and fall
- Reintroduction of UWR Chinook salmon above Hills Creek Dam
- Downstream fish passage facility construction at Hills Creek Dam
- Drawdown fish passage operations at Hills Creek Dam in the spring and fall
- Spill fish passage operations at Hills Creek Dam in the spring and fall
- Temperature control structure or operations at Hills Creek Dam
- Drawdown or delayed refill fish passage operations at Fall Creek Dam in the spring

Systemwide

- Improve or replace some adult release sites above dams
- Remove or modify revetments to improve floodplain connectivity
- Maintenance of mainstem Willamette River juvenile monitoring/sampling facility
- Interim passage operations prior to completion of downstream passage facilities
- Installation and maintenance of new instream flow gages
- Research regarding passage design and effectiveness at new facilities and in subbasins with new adult reintroductions above dams
- Structural improvements to reduce water quality impacts during emergency and unusual events
- Structural improvements to reduce TDG where needed as a result of passage operations
- Additional habitat improvement/restoration projects in the lower tributaries and mainstem

[Non-DoD Source] Willamette Valley System Environmental Impact Statement

Diana Olson <leysin75@gmail.com>

Sun 6/16/2019 8:01 AM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

Dear Envt Resources Specialist Hill,

Thank you for the opportunity to comment on the Willamette Valley System Evaluation. I am a farmer in the Willamette Valley, and am writing to express the importance of continuing to maintain the system for flood control and irrigation storage. We have been hearing a lot in the Valley around both the Willamette Reallocation and potential changes to the operations of the Willamette system dams to benefit fisheries. While we share in the desire to have healthy salmon populations, we do not believe that it is appropriate or wise to adjust the Willamette system operations to experiment with flow regimes or storage regimes that may or may not provide a greater fisheries benefit.

These dams are critical to protecting farms, homes, and communities from growing flood risk, and we all saw first-hand this spring the impact releases from the dams can have on communities. We need to ensure that the dams retain their primary function of flood control, and that any adjustments made to system operations don't reduce or alter flood mitigation capacity.

Similarly, I oppose reducing the water storage capacity behind the dams. This water is critical for future irrigation and community needs, particularly as we trend toward having longer, hotter summers. Recent studies by the Oregon Department of Agriculture show that irrigation demand is going to exponentially increase in the Willamette Valley in the next several decades, as we become an even more critical part of the global food economy. We desperately need additional water supplies to ensure this critical part of our economy is able to adjust to changing conditions and continue to provide a safe, reliable supply of food and fiber to our state, region, and world. I can remember that as a child the back roads between Albany and Shedd, Oregon were always flooded in the winter and livestock were standing stranded on whatever higher ground available. Highway 99 E was passable because it was purposely built on a high bed as was the main railroad. I can recall that in the middle of the night(going to Grandad Margason's farm) he would say to me do you think we can make it to the farm on a back road(the roads were not named until about 1977)? It was very scary because I couldn't see anything but water. Of course, Grandad had a way of knowing how deep the water was and how rapid the current was and he was driving a Ford Model T (which was pretty high off the ground). He would say "OK, lift up your feet and I think we can make it across". After Foster and Green Peter Dams were built, there was a lot less flooding in the Willamette Valley. Flood control is very important for everyone. Last year there was a grave lack of potable water in Salem and the small towns above. What can these people be thinking of to do away with our reservoir system? I think salmon and other fish species are important. That is why we have fish ladders, overflows when the baby fish are making their way to the ocean, and various fish hatcheries in Oregon (for years). I think we should look to the way we have carelessly dumped raw sewage and other pollutants into our

rivers for years as a cause for the decline of fish. It all adds up to foul our waters for fish and people.

Thank you for the opportunity to comment.

Sincerely,

Diana Olson
35854 Richardson Gap Rd
Scio, OR 97374
leysin75@gmail.com

[Non-DoD Source] Willamette Dams

Erik Burke <erikburke@gmail.com>

Tue 5/14/2019 11:54 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

Hi,

Thanks for listening to public comments. Rivers are being with rights and it is unethical to enslave and control them with dams. I strongly believe in removing all 13 dams in the Willamette system.

Best,
Erik

Erik Burke
541-915-1601

[Non-DoD Source] Willamette Valley System Environmental Impact Statement

Elicia Brown <koehn81e@gmail.com>

Mon 6/17/2019 3:31 AM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

Dear Envt Resources Specialist Hill,

Thank you for the opportunity to comment on the Willamette Valley System Evaluation. I am a farmer in the Willamette Valley, and am writing to express the importance of continuing to maintain the system for flood control and irrigation storage. We have been hearing a lot in the Valley around both the Willamette Reallocation and potential changes to the operations of the Willamette system dams to benefit fisheries. While we share in the desire to have healthy salmon populations, we do not believe that it is appropriate or wise to adjust the Willamette system operations to experiment with flow regimes or storage regimes that may or may not provide a greater fisheries benefit.

These dams are critical to protecting farms, homes, and communities from growing flood risk, and we all saw first-hand this spring the impact releases from the dams can have on communities. We need to ensure that the dams retain their primary function of flood control, and that any adjustments made to system operations don't reduce or alter flood mitigation capacity.

Similarly, I oppose reducing the water storage capacity behind the dams. This water is critical for future irrigation and community needs, particularly as we trend toward having longer, hotter summers. Recent studies by the Oregon Department of Agriculture show that irrigation demand is going to exponentially increase in the Willamette Valley in the next several decades, as we become an even more critical part of the global food economy. We desperately need additional water supplies to ensure this critical part of our economy is able to adjust to changing conditions and continue to provide a safe, reliable supply of food and fiber to our state, region, and world.

Thank you for the opportunity to comment.

Sincerely,

Elicia Brown
642 S Center St
Sublimity, OR 97385
koehn81e@gmail.com

Eugene Water & Electric Board
500 East 4th Avenue/Post Office Box 10148
Eugene, Oregon 97440-2148
(541) 484-2411
www.eweb.org

June 27, 2019

Suzanne Hill
U.S. Army Corps of Engineers
P.O. Box 2946
Portland, OR 97208-2946

Re: Willamette Valley System Operations and Maintenance
Environmental Impact Statement – Scoping

Dear Suzanne:

The Eugene Water & Electric Board (EWEB) is Oregon's largest customer-owned utility serving approximately 200,000 people in the greater Eugene and McKenzie Valley areas. Each year, EWEB is responsible for delivering 7.5 billion gallons of drinking water and 4.5 million megawatt-hours of electricity. EWEB's customers rely on the McKenzie River for both power generation and as its sole source of drinking water. Because EWEB's facilities are located downstream of two U.S. Army Corps of Engineers (USACE) Willamette Valley Projects, EWEB has a vested interest in the operations and maintenance of the Willamette Valley System.

EWEB owns and operates two hydropower projects on the McKenzie River, authorized under licenses issued by the Federal Energy Regulatory Commission (FERC). The Carmen-Smith Project (FERC Project No. 2242) is located upstream of and is not affected by any USACE Willamette Valley Projects. The Leaburg-Walterville Project (FERC Project No. 2496), however, is located downstream of the USACE Cougar and Blue River Projects. The FERC license for the Leaburg-Walterville Project specifies minimum in-stream flows be maintained in the McKenzie River downstream of our Leaburg and Walterville canal diversions and affects our ability to generate power. Further, project-induced reductions in river level below both the Leaburg Dam and Walterville Diversion are limited to two inches per hour year-around. As such, the operation and maintenance of these two USACE projects directly affect EWEB's downstream project.

EWEB's Hayden Bridge Filtration Plant is located in the city of Springfield, downstream of the USACE Cougar and Blue River Projects. Operation and maintenance of the USACE projects has the potential to affect downstream water quality. For example, reservoir management can influence cyanobacteria blooms and reservoir drawdowns can result in increased turbidity in the McKenzie River downstream of the projects.

Rely on us.

EWEB would like to offer the following suggestions for the USACE to consider during the continued operation and maintenance of the Willamette Valley Projects:

First, better communication and coordination with downstream water users, such as EWEB, in regards to water and reservoir management, including anticipated deviations from the rule curves, whether it be from short- or long-term projects and/or operational changes.

Second, considering EWEB is one of the numerous stakeholders invested in the recovery of McKenzie ESA fish stocks, it would be beneficial to the resource if there was improved coordination and communication by the USACE in regards to fish enhancement projects/operational changes etc., which could potentially identify opportunities for the stakeholders to work in a more synergistic manner.

Thank you for your time and consideration. Please let me know of any additional information you may need or if you need clarification of the information provided. Feel free to contact me at 541-685-7379 or at mike.mccann@eweb.org.

Sincerely,

Michael J. McCann
Electric Generation Manager

Rely on us.

[Non-DoD Source] Willamette Valley System Environmental Impact Statement

John Zielinski <john@ezorchards.com>

Thu 6/20/2019 2:23 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

Dear Envt Resources Specialist Hill,

Thank you for the opportunity to comment on the Willamette Valley System Evaluation. I am a farmer in the Willamette Valley. I have attended several of the community meetings or community conversations that have been held by the Army Corps of Engineers. I have concerns about bank erosion, and stream depth in the main stem of the Willamette River. I and am writing to express the importance of continuing to maintain the system for flood control and irrigation storage. We have been hearing a lot in the Valley around both the Willamette Reallocation and potential changes to the operations of the Willamette system dams to benefit fisheries. While we share in the desire to have healthy salmon populations, we do not believe that it is appropriate or wise to adjust the Willamette system operations to experiment with flow regimes or storage regimes that may or may not provide a greater fisheries benefit.

These dams are critical to protecting farms, homes, and communities from growing flood risk, and we all saw first-hand this spring the impact releases from the dams can have on communities. We need to ensure that the dams retain their primary function of flood control, and that any adjustments made to system operations don't reduce or alter flood mitigation capacity.

Similarly, I oppose reducing the water storage capacity behind the dams. This water is critical for future irrigation and community needs, particularly as we trend toward having longer, hotter summers. Recent studies by the Oregon Department of Agriculture show that irrigation demand is going to exponentially increase in the Willamette Valley in the next several decades, as we become an even more critical part of the global food economy. We desperately need additional water supplies to ensure this critical part of our economy is able to adjust to changing conditions and continue to provide a safe, reliable supply of food and fiber to our state, region, and world.

Thank you for the opportunity to comment.

Sincerely,

John Zielinski
5270 55th Ave NE
Salem, OR 97305
john@ezorchards.com

[Non-DoD Source] Workshop/Tour/Speaker Inquiry

Katie Gibbs <katie@saturdayacademy.org>

Tue 4/9/2019 5:56 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

Hi Suzanne,

I am the Classes and Camps Coordinator for Saturday Academy, a Portland metro STEM education non-profit that has been connecting students in grades 2 through 12 with STEM professionals through classes, camps, and internships for 36 years. Each year, we offer several **engineering-themed camps for both middle and high school students.** As part of our full-day camps, we aim to get students into environments—businesses, labs, etc.—where engineering is taking place. Typically the sessions I arrange are about 1.5 to no more than 3 hours in length. We generally aim to arrange either a demonstration or a hands-on activity—as opposed to a lecture/powerpoint type of presentation—so that kids can get as close as possible to really trying engineering on for size. Our student groups don't exceed 18 students.

I am currently hoping to arrange a tour that is centered around the theme of hydropower, renewable energy, or large civil engineering projects with a sustainability/environmental focus. In the past, we have been able to arrange tours of the Bonneville Dam, but those have become restricted. Last summer I was able to arrange a tour of the Clackamas River PGE hydro sites, but those will be undergoing some construction this summer, and are also not an option at this time.

If the US Army Corps of Engineers in the Portland District—or perhaps another local nearby district—has any educational outreach programs aimed at middle or high school students, I would be interested to learn of them. In many cases when I reach out to arrange a guest speaker, workshop, demo, or tour (our classes are hands-on!), I am able to connect with a passionate professional in the field who can arrange something, even if it's not something typically offered to the public.

If you can think of any site—be it a dam, a renewable energy production site, even a lab where research is conducted—or any person who might be willing to expose a group of aspiring engineers to their work world for a morning or afternoon this summer, please let me know. Alternately, if you could forward this email to others who might better be able to help, that would also be greatly appreciated.

Many thanks for your time and consideration,

Katie Gibbs, M. Ed.
Classes and Camps Coordinator
katie@saturdayacademy.org
503.200.5866 (direct)

Saturday Academy
University of Portland
5000 N Willamette Blvd.
Portland, OR 97203

Spring & Summer 2019 Classes are Enrolling Now!

We're not just on Saturdays!

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Caleb Price
Monitoring Coordinator

Project Manager

Jean-Paul Zagarola
Bonneville Environmental Foundation

June 28, 2019

To: U.S. Army Corps of Engineers, Portland Region

The Luckiamute Watershed Council (LWC) submits this letter as comment for the scoping process to prepare an Environmental Impact Statement for the Willamette Valley System Operations and Maintenance.

The LWC's mission is to engage and assist landowners and communities in the voluntary protection, restoration and enhancement of the Luckiamute and Ash Creek watersheds.

The LWC is also a member of the Willamette Mainstem Anchor Habitat Working Group (AHWG), a partnership of 16 Willamette Valley organizations committed to protecting and restoring ecosystem function. The AHWG works to support the vision laid out in the Willamette Restoration Strategy (2001). The vision aspires to attain "a dynamic balance between diverse human and ecological needs" and creating a place where "basin residents can live in healthy watersheds with functioning floodplains and habitats supporting a diversity of native species."

Each member of the AHWG plays a distinct role in achieving long-term restoration, conservation and stewardship along the historic meander and current channel of the Willamette River and its major tributaries. The AHWG collectively works to sustain and enhance seasonally important resources for native fish. This goal is accomplished, where feasible, through various means such as reforestation of floodplain forests, controlling priority invasive aquatic weeds, reconnecting the river to its floodplain, and enhancing and creating off-channel habitat.

The LWC and AHWG have prioritized these activities because they are of ecological importance to economically and culturally significant ESA-listed salmonids and other native fish species of concern. This work also supports improved water quality, retention of floodwaters, and groundwater recharge while supporting habitats for a wide range of aquatic and terrestrial native species critical to the overall health of the Willamette Valley ecosystem. AHWG partners have been working for more than ten years along the Willamette River and its tributaries. It has made significant progress thanks to the collective efforts of agencies, organizations, and individuals. Much work remains and success can only occur with this continued regional collaboration. The LWC encourages the USACE to incorporate in its scope evaluation how its operations can support creating a place where "basin resident can live in healthy watersheds with functioning floodplains and habitats supporting a diversity of native species." There are many competing interests, and it will be incumbent upon the Corps to balance all those interests while maintaining strong, collaborative relationships with its partners.

The LWC encourages USACE to examine opportunities in its Willamette Bank Protection Program for revetments to be removed or modified where ecological benefits can be

achieved with low risk to infrastructure. Identifying areas where river processes such as erosion and deposition can be restored will increase overall river health. Increasing the extent and duration of floodplain and off-channel habitats helps reduce the intensity, severity, and frequency of flooding, with short and long-term benefits for infrastructure located in harm's way, and reduced costs to the state and federal governments in the long term. The USACE can also examine how if can develop a process to work with landowners when a revetment fails to determine if alternatives exist to replacement or reinforcement of the existing revetment. Local partners exist to work with USACE and landowners if these situations arise.

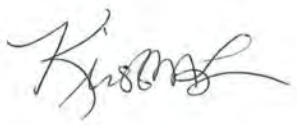
The LWC encourages USACE to examine flow operations that protect infrastructure but also balance water quality and habitat needs for native species.

The LWC encourages USACE to examine and incorporate recent research available on river processes and habitat needs. The Willamette Valley is fortunate to have robust research facilities contributing to the knowledge base that informs improved management of natural resources. These include the SLICES Framework, cold-water refuge and geomorphic mapping, fish distribution, and Willamette Water 2100 modeling results among others. USACE could build into its operations and maintenance a review and update process that can take advantage of new information as it is being made available or within some pre-determined time frame.

The LWC encourages USACE to reach out to local partners to work together to achieve common goals for the health of the Willamette River system and those that depend on it.

Thank you for consideration of these comments.

Sincerely,



Kristen Larson
Executive Director

[Non-DoD Source] Willamette Valley System Environmental Impact Statement

Mark Dickman <dfarms@mtangel.net>

Mon 6/3/2019 11:21 AM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

Dear Envt Resources Specialist Hill,

Thank you for the opportunity to comment on the Willamette Valley System Evaluation. I am a farmer in the Willamette Valley, and am writing to express the importance of continuing to maintain the system for flood control and irrigation storage. We have been hearing a lot in the Valley around both the Willamette Reallocation and potential changes to the operations of the Willamette system dams to benefit fisheries. While we share in the desire to have healthy salmon populations, we do not believe that it is appropriate or wise to adjust the Willamette system operations to experiment with flow regimes or storage regimes that may or may not provide a greater fisheries benefit.

These dams are critical to protecting farms, homes, and communities from growing flood risk, and we all saw first-hand this spring the impact releases from the dams can have on communities. We need to ensure that the dams retain their primary function of flood control, and that any adjustments made to system operations don't reduce or alter flood mitigation capacity.

Similarly, I oppose reducing the water storage capacity behind the dams. This water is critical for future irrigation and community needs, particularly as we trend toward having longer, hotter summers. Recent studies by the Oregon Department of Agriculture show that irrigation demand is going to exponentially increase in the Willamette Valley in the next several decades, as we become an even more critical part of the global food economy. We desperately need additional water supplies to ensure this critical part of our economy is able to adjust to changing conditions and continue to provide a safe, reliable supply of food and fiber to our state, region, and world.

Thank you for the opportunity to comment.

Sincerely,

Mark Dickman
15829 MT Angel Scotts Mills Rd NE
Silverton, OR 97381
dfarms@mtangel.net

[Non-DoD Source] Re: ACOE EIS

Birdshill CPO/NA <birdshill.cpo.na@gmail.com>

Mon 6/10/2019 5:11 PM

To: Michael Pyszka <MPyszka@parametrix.com>;

Cc: Birdshill CPO/NA <birdshillcpona@gmail.com>; Skip Ormsby <sentinelskip@gmail.com>; Williams, Stephen <SWilliams@co.clackamas.or.us>; Carole Ockert <fanfh-carole@europa.com>; Jon Bell <jontbell@comcast.net>; Sarah Ellison <scgellison@gmail.com>; Craig Stephens <cyanblue189@gmail.com>; Leslie Goss <lesliegoss@mac.com>; CPO Summit <cposummitcouncil@gmail.com>; McCaleb, Iris <imccaleb@ci.oswego.or.us>; Bill Ward <wwward03@gmail.com>; citycouncil@westlinnoregon.gov <citycouncil@westlinnoregon.gov>; metrocouncil@oregonmetro.gov <metrocouncil@oregonmetro.gov>; John Wendland <john@portlandbindery.com>; Kohlhoff, Theresa <tkohlhoff@ci.oswego.or.us>; bcc@co.clackamas.or.us <bcc@co.clackamas.or.us>; pmalee@westlinntidings.com <pmalee@westlinntidings.com>; CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>; councildistribution@ci.oswego.or.us <councildistribution@ci.oswego.or.us>;

2019 Jun 10 Monday 14:15 [2:15 PM PT]

Mike
Thanks for the info on
US Army Corps of Engineers Portland District
regarding Willamette River (Basin) System and
upcoming deadline of comment period
ending 2019 Jun 28 Friday.

Two take aways from kick off of four year
project to update EIS policies revised last in 1980(s)
Meeting held on
2019 Jun 06 Thursday 16:00 U [4:00 PM PT].
at PSU conference center
310 SW Lincoln Street.
Notice by blurb on Portland Tribune Website
that morning.

ONE:
USACE Portland District
CANNOT CONTROL
Willamette River FLOODING.
USACE can only mitigate flooding effects.
<Barely and depending upon conditions
especially 100 - 200 miles downstream
of major Willamette River dams>.

TWO

Government entities along
Willamette River should not encourage
or promote expensive and
dense population development
below Base Flood Elevations [BFE(s)]
ie
in the Flood Plain.

Perhaps City of LO might learn before it is too late.
Like Columbia River and deceased city of Vanport
circa 1947 May
And
Lakewood Bay (Oswego Lake) to Willamette River shunt
circa 1996 Feb through
Foothills District in City of Lake Oswego.

Found website and PDF links on Sunday.
Posted to:
BH_Kn_CE_19-01_WSOM
Will need to make and update
a series of infographics to describe
the reach (section) of Willamette River
fronting my neighborhood of the
Birdshill CPO / NA to east.
In vicinity of UPRR Railroad Bridge at
Willamette River Mile (WLRM),
WLRM_020.0

Will keep you apprised.
Examples of Birdshill infographics
1. 2017 Oct BH IGPA OR43 STA LO UPRR Corridor .
2. 2017 Oct BH IGPA Cntx LO RR Bridge
3. 2017 Oct BH IGPA Cntx Foothills Pk and IS
4. 2015 Dec Quad LO BH RLWR 22 N 19

This is the sort of condensed info I think
public needs to have on OGLO Ped / Bike Bridge.
Plus
US Army Corps of Engineers Portland District
projects on the Willamette River
Plus
Too TOO many City of Lake Oswego Oregon
projects.
Along with uniformed neighborhoods and
affected citizens by citizen involvement programs.
See PP 19-0006 if you can via the
fracked up City of Lake Oswego Archive System
provided by Lazerfiche Inc.

PP 19-0006 is about to eviscerate the
abysmal citizen involvement process
by the
LO Planning Commission / committee for
Citizen Involvement beginning this
evening, 2019 Jun 10 Monday 18:00 U [6:00 PM PT].

At whose direction and insistence begat this
project will be my key questions. I expect respones
in writing.
Or just tell me where to file discrimination complaints.

City of LO favors developers
First, Foremost and Forever!!!

Thanks
Skip
503.636.4483

Please forward to all who need to know.

On Fri, Jun 7, 2019 at 12:01 PM Michael Pyszka <MPyszka@parametrix.com> wrote:

> Steve & Skip – attached is the PDF of the ACOE handout from last night. Additionally here is a link to the project website:
>
> Blockedhttps://www.nwp.usace.army.mil/Locations/Willamette-Valley/System-Evaluation-EIS/
>
> Mike
>
> Michael Pyszka, P.E.
> Sr Engineer, Project Manager
> 503.233.2400| main
> 503.416.6187 | direct
>
>
>

[Non-DoD Source] Willamette Valley System Allocation Comments

Destinee S <mattanddestinee@gmail.com>

Wed 6/5/2019 12:25 AM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

1 attachments (14 KB)

Willamette Valley Allocation Comments.docx;

May 31, 2019

U.S. Army Corps of Engineers,
CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946

Email: willamette.eis@usace.army.mil

Re: Scoping Comments on Willamette Valley System Evaluation

Ms. Hill,

Thank you for the opportunity to comment on the Willamette Valley System Evaluation. I am a farmer in the Willamette Valley, and am writing to express the importance of continuing to maintain the system for flood control and irrigation storage. We have been hearing a lot in the Valley around both the Willamette Reallocation and potential changes to the operations of the Willamette system dams to benefit fisheries. While we share in the desire to have healthy salmon populations, we do not believe that it is appropriate or wise to adjust the Willamette system operations to experiment with flow regimes or storage regimes that may or may not provide a greater fisheries benefit.

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Similarly, I oppose reducing the water storage capacity behind the dams. This water is critical for future irrigation and community needs, particularly as we trend toward having longer, hotter summers. Recent studies by the Oregon Department of Agriculture show that irrigation demand is going to exponentially increase in the Willamette Valley in the next several

decades, as we become an even more critical part of the global food economy. We desperately need additional water supplies to ensure this critical part of our economy is able to adjust to changing conditions and continue to provide a safe, reliable supply of food and fiber to our state, region, and world.

Thank you for the opportunity to comment.

Sincerely,

Matthew Schuster
2181 Waconda Rd NE
Gervais, OR 97026

[Non-DoD Source] Comments for Willamette Valley System Operations and Maintenance

Matt Blakeley-Smith <matt@greenbeltlandtrust.org>

Fri 6/28/2019 4:24 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

June 28, 2019

To: U.S. Army Corps of Engineers, Portland Region
From: Greenbelt Land Trust 101 SW Western Blvd., Ste. 111 Corvallis, OR 97333

Greenbelt Land Trust submits this letter as comment for the scoping process to prepare an Environmental Impact Statement for the Willamette Valley System Operations and Maintenance.

The mission of the Greenbelt Land Trust is to conserve and protect in perpetuity native habitats, working lands, and lands of natural beauty, which provide a connection to the natural world for residents of the mid-Willamette Valley.

Greenbelt holds permanent Conservation Easements on 36 properties, totaling over 3,600 acres in the Willamette Valley. Specific to the Willamette River, Greenbelt owns in fee title, or holds a conservation easement on approximately 760 acres at River Mile 154, 125, and 107.7. Greenbelt also owns 405 acres of river frontage in fee title on the North Santiam River just east of Stayton. Greenbelt actively manages and restores native floodplain habitat for the benefit of fish and wildlife, with a special focus on listed ESA species.

Greenbelt Land Trust is also a member of the Willamette Mainstem Anchor Habitat Working Group (AHWG), a partnership of 16 Willamette Valley organizations committed to protecting and restoring ecosystem function. The AHWG works to support the vision laid out in the *Willamette Restoration Strategy* (2001). The vision aspires to attain "a dynamic balance between diverse human and ecological needs" and creating a place where "basin residents can live in healthy watersheds with functioning floodplains and habitats supporting a diversity of native species."

Each member of the AHWG plays a distinct role in achieving long-term restoration, conservation and stewardship along the historic meander and current channel of the Willamette River and its major tributaries. The AHWG collectively works to sustain and enhance seasonally important resources for native fish. This goal is accomplished, where feasible, through various means such as reforestation of floodplain forests, controlling priority invasive aquatic weeds, reconnecting the river to its floodplain, and enhancing and creating off-channel habitat.

Greenbelt Land Trust and AHWG have prioritized these activities because they are of ecological importance to economically and culturally significant ESA-listed salmonids and other native fish species of concern. This work also supports improved water quality, retention of floodwaters, and groundwater recharge while supporting habitats for a wide range of aquatic and terrestrial native species critical to the overall health of the Willamette Valley ecosystem. AHWG partners have been working for more than ten years along the Willamette River and its tributaries. It has made significant progress thanks to the collective efforts of agencies, organizations, and individuals. Much work remains and success can only occur with this continued regional collaboration. Greenbelt Land Trust encourages the USACE to incorporate in its scope evaluation how its operations can support creating a place where "basin resident can live in healthy watersheds with functioning floodplains and

habitats supporting a diversity of native species." There are many competing interests, and it will be incumbent upon the Corps to balance all those interests while maintaining strong, collaborative relationships with its partners.

Greenbelt Land Trust encourages USACE to examine opportunities in its Willamette Bank Protection Program for revetments to be removed or modified where ecological benefits can be achieved with low risk to infrastructure. Greenbelt Land Trust is specifically interested in the Scatter Bar revetment and the Irish Bend Revetment since we either own the property that those revetments are protecting or hold a permanent Conservation Easement on those lands. Identifying areas where river processes such as erosion and deposition can be restored will increase overall river health. Increasing the extent and duration of floodplain and off-channel habitats helps reduce the intensity, severity, and frequency of flooding, with short and long-term benefits for infrastructure located in harm's way, and reduced costs to the state and federal governments in the long term. The USACE can also examine how it can develop a process to work with landowners when a revetment fails to determine if alternatives exist to replacement or reinforcement of the existing revetment. Local partners exist to work with USACE and landowners if these situations arise.

Greenbelt Land Trust encourages USACE to examine flow operations that protect infrastructure but also balance water quality and habitat needs for native species.

Greenbelt Land Trust encourages USACE to examine and incorporate recent research available on river processes and habitat needs. The Willamette Valley is fortunate to have robust research facilities contributing to the knowledge base that informs improved management of natural resources. These include the U of O SLICES Framework, cold water refuge and geomorphic mapping, fish distribution, and Willamette Water 2100 modeling results among others. USACE could build into its operations and maintenance a review and update process that can take advantage of new information as it is being made available or within some pre-determined time frame.

Greenbelt Land Trust encourages USACE to reach out to local partners to work together to achieve common goals for the health of the Willamette River system.

Sincerely,

Matt Blakeley-Smith
Habitat Restoration Manager
Greenbelt Land Trust

[Non-DoD Source] Willamette Valley System Environmental Impact Statement

Montgomery Smith <user@votervoice.net>

Thu 6/6/2019 11:01 AM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

Dear Envt Resources Specialist Hill,

Thank you for the opportunity to comment on the Willamette Valley System Evaluation. I am a farmer in the Willamette Valley, and am writing to express the importance of continuing to maintain the system for flood control and irrigation storage. We have been hearing a lot in the Valley around both the Willamette Reallocation and potential changes to the operations of the Willamette system dams to benefit fisheries. While we share in the desire to have healthy salmon populations, we do not believe that it is appropriate or wise to adjust the Willamette system operations to experiment with flow regimes or storage regimes that may or may not provide a greater fisheries benefit.

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Thank you for the opportunity to comment.

Sincerely,

Montgomery Smith
2218 Horseshoe Lake Rd NE
Saint Paul, OR 97137
mksmithwbf@yahoo.com

Marion County
OREGON

Board of Commissioners

(503) 588-5212
(503) 588-5237-FAX

BOARD OF COMMISSIONERS

Sam Brentano
Kevin Cameron
Colm Willis

CHIEF ADMINISTRATIVE OFFICER

John Lattimer

June 27, 2019

Via E-mail (willamette.eis@usace.army.mil)
and U.S. Mail

U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, OR 97208-2946
Attention: CENWP – PME - E

Re: Willamette Valley System Operations and Maintenance Environmental Impact Statement

Dear Colonel Dorf:

On April 1, 2019, the U.S. Army Corps of Engineers published in the Federal Register a Notice of Intent to solicit written comments for consideration in the development of the NEPA Environmental Impact Statement (EIS) regarding the operation and maintenance of the Willamette Valley System (WVS). Marion County provides the following public comments regarding the proposed EIS.

The County understands that:

- The EIS will evaluate the impacts of continued operations and maintenance of the WVS;
- The Corps has reinitiated formal consultation under Section 7 of the ESA on the National Marine Fisheries Service's 2008 Biological Opinion for the Willamette River Basin Flood Control Project to inform the ESA Section 7 consultation process;
- The Corps intends to initiate consultation under Section 106 of the National Historic Preservation Act; and
- The Corps anticipates that the draft EIS will be made available for public comment in Fall/Winter 2020.

At the outset, the County wishes to emphasize the importance of reliable water from the WVS to the communities within the County.

The WVS provides Marion County with essential resources that support recreation, irrigation, drinking water, and public health. Most Marion County communities are located within the North Santiam Watershed, which is part of the WVS, making water from the WVS fundamental to life within the County. The County is concerned about the impact that management and operational changes to the WVS could have on the livelihood of communities within the County and to the revenues of the County itself. In the Federal Register notice, the Corps indicated that one of the purposes of public participation is to obtain input on "issues of concern." The U.S. Army Corps of Engineers needs to take into account the County's concerns in this process. Ignoring impacts to the health, safety, and welfare of Marion County communities and this critical natural water resources could result in irreparable damage at the conclusion of this process.

1. Recreation and Tourism Purposes

Detroit Lake, situated within the WVS, is a popular recreational destination in Marion County. During the winter months, Detroit Lake is maintained at an elevation of no lower than 1450 feet. Between Memorial Day and Labor Day, the water is approximately 1560 feet. Lower water levels throughout the summer could impact and effectively eliminate recreational use of Detroit Lake, which provides approximately 70% of jobs in the Detroit Lake area. The docks and marinas on Detroit Lake range from 1530 to 1560 feet (with the exception of one at 1450 feet). If the water level is too low to accommodate recreation throughout the summer, many businesses would not survive.

Of course, much of the boat access is for fishing and much of that fishing is for plentiful hatchery summer steelhead. The Minto Fish Hatchery, located 7 miles downstream of Detroit Lake, has also been a key component of County residents' livelihood through fishing and tourism. While the County applauds efforts to restore native salmon and steelhead, improved hatchery practices should continue as well.

We ask that the Corps take into account the role that recreation from lakes and streams in the North Santiam Watershed provide to the County when preparing a new EIS for the WVS.

2. Irrigation Purposes

Many farms within Marion County rely on water from the Detroit reservoir and the North Santiam River for irrigation. Marion County is the largest producing agricultural county in the state of Oregon. As of 2012, Marion County's agricultural land area totaled 286,194 acres. 800 agricultural firms employ over 16,000 people, with a payroll of nearly $550 million dollars. Lower water levels at Detroit Lake and on the North Santiam River would impact 19% of the county land area and 41% of county jobs. Any change in management and operation of the WVS must protect the irrigation interest of farmers within Marion County.

3. County's Economic Interest

Marion County's economy relies heavily on water in the North Santiam Watershed and particularly on Detroit Lake. In total, a report prepared by EcoNorthwest and titled "Importance of Water in the North Santiam Basin" (Exhibit A) concludes that the economic value of water in the North Santiam Watershed exceeds $180 million per year, including $36.5 million from recreation and $59.8 million from irrigation-related agriculture. Based on those figures, and the fact that more than half of the North Santiam Watershed is in Marion County, and more than one-third of the County is in the North Santiam Watershed, the County estimates that low water conditions could result in an economic loss of $11 million per year to local businesses and industries just for recreation purposes. This is a loss that the County cannot afford and that would negatively impact many of our local communities. The Corps should consider the importance of water to the economic life of the County when drafting the EIS.

4. County's Public Interest

Lower water levels in Detroit Lake or on the North Santiam River would have ripple effect, extending beyond businesses in close proximity and depriving nearby farmers of irrigation water. Additionally, the economic impact would affect tax revenue for the county, which funds health and safety services. Variability in water level could also increase erosion and the risks of landslides along Highway 22, an important transportation corridor between the Willamette Valley and Central Oregon. Landslides not only cause significant public safety hazards in the area, but may impact the entire state.

5. Drinking Water Supplies

The City of Salem and various communities, including Stayton and Gates, rely on Detroit Lake for drinking water. Lower water levels would put those communities which do not have adequate back-up supplies at risk. Radically adjusting water levels will increase risk of turbidity in the North Santiam River downstream of the dams. This turbid water will create significant operational challenges for water supply systems. Increased and sustained turbidity caused lowering water levels in the McKenzie River during construction of the temperature control structure at Cougar Dam in 2002, and created an average turbidity in the river of 106 NTU for four months. Lowering seasonal water elevations in Detroit Reservoir and Big Cliff Reservoir may lead to higher water temperatures in the North Santiam River as well. Any deviations from normal water quality parameters have the ability to impact water treatment plant operations.

Higher water temperatures may also increase the occurrence and magnitude of algal blooms in Detroit Reservoir and the North Santiam River. Algal blooms can negatively impact the water treatment process by:

(1) Clogging filters and inhibiting the ability to meet water demand;

(2) Producing dangerous algal toxins; and

(3) Creating taste and odor issues such as those caused by Geosmin and 2-Methylisoborneol (MIB).

Even if water quality is not impacted by solids or algae, the risk to maintaining the quantity of downstream flow must be considered. When drafting the new EIS, the Corps should give particular attention to the drinking water needs of reliant communities.

Conclusion

In light of the importance of the North Santiam Watershed to the livelihood of communities within Marion County, we expect that studies will be conducted to project the economic and human impact of changes to the management of the WVS including the North Santiam Watershed.

We appreciate the opportunity to work with the Corps on the implementation of a new EIS for the Willamette Valley System in a way that supports the needs of the County and its communities. As the process moves forward we may have to seek legal alternatives if the needs of local communities are not satisfied in the proposed EIS. We anticipate that our concerns will be included in the draft of the EIS.

Sincerely,

Kevin Cameron, Chair Sam Brentano, Vice Chair Colm Willis, Commissioner

OREGON WATER UTILITY COUNCIL
Pacific Northwest Section, American Water Works Association
PNWS-AWWA

June 28, 2019

U.S. Army Corps of Engineers, Portland District
ATTN: CENWP-PME-E
P.O. Box 2946
Portland, OR 97208-2946

RE: Public Scoping Comments on the Environmental Impact State for Operations and Maintenance of Willamette Valley System (Document Number: 2019-06258)

The Oregon Water Utilities Council (OWUC) is providing these comments for consideration in the development of the scope of the Environmental Impact Statement to address the continued operations and maintenance of the Willamette Valley System.

OWUC is a committee of the Pacific Northwest Section of the American Water Works Association and represents the water utilities that provide approximately 90 percent of Oregon's drinking water supply. OWUC has been actively involved in the effort to obtain access to stored water in the Willamette Valley Project (WVP) reservoirs for municipal and industrial (M&I) purposes. Approximately 70 percent of the state's population is located in the Willamette Basin, and approximately 85 percent of the population in the Willamette Basin is supported by public water systems.

These public water systems provide safe, reliable water supply for public health, safety and for business and industrial development activities. The ability of the water providers to meet the projected long-term water supply requirements of our communities is critical to the protection of public health and the economic viability of our state.

Public Water Providers Have Been Working to Obtain WVP Storage for Decades

The Flood Control Acts of 1938 and 1950 authorized the United States Army Corps of Engineers (USACE) to construct and operate the Willamette Basin projects. Despite the fact that in 1950 Congress authorized the Willamette Basin projects for multiple purposes, including "potable water supply," four years later (in 1954), the United States Bureau of Reclamation requested a water right to store water only for irrigation purposes. Consequently, the Oregon Water Resources Department (OWRD) cannot presently issue water rights for the use of this stored water for any purposes other than irrigation until the Willamette Basin Review Feasibility Study is completed with a final Chief's report and subsequent implementation of that recommendation.

Over the last several decades, stakeholders and state and federal agencies have been actively engaged in efforts to address the diverse demands for the stored water in the Willamette Basin projects. Beginning in June 1996, the USACE began working cooperatively with the State of Oregon and stakeholders as part of the Willamette Basin Reservoir Study. The study was "put on hold" in 2000 following the listing of Willamette River stocks of salmon and steelhead as threatened under the Endangered Species Act (ESA). In 2015, the USACE reinitiated the Willamette Basin Review Feasibility Study. The study was completed in November 2017. It identified a demand for 159,750 acre feet of storage space for M&I use. Nevertheless, until a full system-wide EIS is completed, M&I storage space may be capped at 43,000 acre feet.

WVP Storage is the Last Remaining Water Supply Available to Water Providers

After almost 30 years of effort, we are excited about the opportunity to have access to stored water and to develop an M&I contracting program. It is well understood that the stored water in the WVP constitutes the overwhelming majority of the remaining water supply available to public water providers in the Willamette Basin to meet future demands.

OWRD's Willamette Basin Program rules (OAR 690-502) effectively preclude new water rights for municipal water supply from most surface water sources in the basin and opportunities to obtain new groundwater supplies are constrained by multiple regulatory limitations (there are currently 12 critical groundwater or groundwater limited areas in the lower Willamette Basin, and new groundwater appropriations with the "potential for interference" with surface water bodies have been disallowed). Furthermore, some existing water rights for municipal water supply downstream from the WVP reservoirs may become less reliable as a result of the impacts of climate change, reallocation of conservation storage for fish and wildlife benefits, and the subsequent issuance of water rights to protect stored water for instream purposes, or as a result of changes in the operation of the Willamette Valley System.

Water Providers Require Reliable Water Supplies

Public water providers are required to provide safe and reliable water supply to the communities they serve. Accordingly, they plan for water supply investments based on a planning period of 50 years or longer. In addition, they plan for multiple (redundant) water supplies to ensure uninterrupted service and the greatest protection possible for public health and safety. To meet these water service obligations, water providers must finance, permit and build complex and expensive infrastructure to extract, treat, and deliver high quality drinking water to homes and businesses. The monetary burden of this work is shouldered by our customers, the citizens of Oregon.

Whether for redundant supply or to meet growing demands, the water providers in the Willamette Basin need access to reliable water supply in order to finance long-term investments in infrastructure for the protection of public health and that support economic growth. Storage space that is disproportionately subject to curtailment, interruptible, or has "second-fill" status is unreliable both from year-to-year and over the long-term (see 33 C.F.R. § 209), and therefore cannot provide a sound basis for investment in water supply infrastructure. Similarly, the current cap of 43,000 acre feet on M&I storage space is too low to provide certainty that stored water supplies will still be available within the long repayment periods of debt issued to finance the construction of water supply infrastructure.

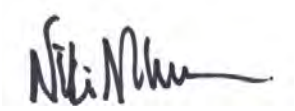
In summary:

- **WVP storage constitutes the overwhelming majority of the remaining water supplies available to public water providers in the Willamette Basin to meet future demands.**
- **Municipalities require reliable sources of water in order to invest in water supply infrastructure for resiliency, redundancy, and to support our growing communities.**
- **In order for WVP storage to meet water providers' needs for reliability, it is important that the USACE maintain the proportionate curtailment recommendation and policy for all beneficial uses of stored water on the system including for fish and wildlife supply**.
- **Furthermore, municipalities expect that after the operations and maintenance EIS is completed, the 43,000 acre foot cap on municipal and industrial contracts will be removed, allowing access to 159,750 acre feet of WVP storage**.

As part of its NEPA evaluation for the overall Willamette Valley System operations and maintenance, USACE should carefully consider the critical component of the stored water to protection of public health, economic impacts of existing and future water supplies for public water providers, and impacts to existing public water systems' water supplies due to proposed construction projects for EIS implementation.

We look forward to continuing to work with USACE to reach major milestones in the reallocation process and continuing the discussion on the protection of endangered species in the basin. Feel free to contact me should you have any questions regarding this letter.

Sincerely,



Niki Iverson
Project Manager, Oregon Water Utilities Council
Water Director, City of Hillsboro

June 28, 2019

U.S. Army Corps of Engineers,
CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946

SUBMITTED VIA EMAIL: willamette.eis@usace.army.mil

Re: Scoping Comments on Willamette Valley System Evaluation

Ms. Hill,

Thank you for the opportunity to comment on the Willamette Valley System Evaluation. Our organizations represent farmers, ranchers, irrigation districts, drainage districts, and agriculture dependent businesses whose livelihood is tied to the operations of the Willamette Valley System. We have been actively engaged in the Willamette Reallocation process for the past several years and have a strong interest in both the flood risk management and water storage functions of the Willamette Valley System.

The Corps is seeking comments on the issues our organizations and the members we represent are concerned about related to the systemwide evaluation of the Willamette Valley System. The issues are numerous and very fact dependent. For example, we are very concerned about changes to the timing of when the Corps manages the System for flood control storage versus conservation storage. Our membership is both dependent on the winter flood control storage and the spring/summer conservation storage, and the correct balance between the two is critical. However, without a specific proposal to comment on, it is impossible to run through the myriad of impacts such a proposal could have on agricultural interests in each basin, and list all of the attendant issues that any particular change to the system could create.

Background on Agricultural Organizations

By way of background, Oregon Farm Bureau Federation (OFB) is a voluntary, grassroots, nonprofit organization representing Oregon's farmers and ranchers in the public and policymaking arenas. As Oregon's largest general farm organization, its primary goal is to

promote educational improvement, economic opportunity, and social advancement for its members and the farming, ranching, and natural resources industry. Today, OFB represents over 7,000-member farm families professionally engaged in the industry. The Oregon Farm Bureau has 3,084 members in the Willamette Valley.

The Oregon Association of Nurseries (OAN) represents the nursery and greenhouse industry. The nursery and greenhouse industry is one of the state's largest agricultural sectors, and Oregon ranks as the third largest nursery state in the nation, with over $909 million in sales annually to customers in Oregon, the rest of the United States, and abroad. In fact, nearly 75% of the nursery stock grown in our state leaves our borders – with over half reaching markets east of the Mississippi River. Nursery operations send ecologically friendly green products out of the state, and bring traded sector dollars back to Oregon. Nursery association members represent wholesale plant growers, Christmas tree growers, retailers, and greenhouse operators. Our members are located throughout the state, with our largest nursery growing operations found in Clackamas, Marion, Washington, Yamhill and Multnomah Counties.

The Oregon Water Resources Congress (OWRC) is a nonprofit association representing irrigation districts, water control districts, improvement districts, drainage districts and other local government entities delivering agricultural water supplies. These water stewards operate complex water management systems, including water supply reservoirs, canals, pipelines, and hydropower facilities. Our members deliver water to roughly 1/3 of all irrigated land in Oregon, including farmers, nursery growers, and other agricultural water users in the Willamette Basin.

The Santiam Water Control District was formed in 1954. The District irrigation distribution system consists of 114 miles of canals and ditches extending from Stayton to Salem. The District presently delivers water to three hydroelectric plants, municipal water to the City of Stayton, cooling water to Norpac Foods, irrigation water for over 17,000 acres and other various uses. SWCD also conveys water to the critical habitat of listed species and performs contractual delivery obligations to federal, state, and county facilities, wetland restoration projects, and wildlife. SWCD holds over 197 cfs of consumptive and 947 cfs of non-consumptive surface water rights with priority dates spanning from 1866 to 1987. The SWCD lands, farmers working those lands, listed species, and municipal interests are dependent upon SWCD. In turn, SWCD is dependent upon the operation of the Detroit Lake and Big Cliff reservoirs located upstream of the SWCD points of diversion.

The Oregon Seed Council (OSC) is a trade organization that advocates for seed farmers, seed marketers, brokers, researchers and others involved in the Oregon seed industry.

The Oregon Dairy Farmers Association (ODFA) was founded in 1892 to work on behalf of Oregon dairy farmers. Today, ODFA represents Oregon's 228 multi-generational dairy farming families. Dairy farms are located in 21 counties and approximately 125,000 cows call Oregon "home." ODFA strives to create an atmosphere that is conducive for all Oregon dairy producers. These farms are extremely diverse family businesses. Milk is the fourth

most valuable agricultural commodity produced in Oregon, generating more than $474 million in gross farm sales in 2015.

The Oregon Cattlemen's Association (OCA) works to advance the economic, political and social interests of the Oregon Cattle Industry.

The Oregon Wheat Growers League is proud to represent the nearly 2,000 farms across Oregon that produce wheat, one of our State's largest and most valuable crops. Wheat is grown in 30 of Oregon's 36 Counties and, with nearly 90% of our production going to export markets, it is one of Oregon's most important export crops. Wheat contributes hundreds of millions of dollars in direct and indirect value to Oregon's economy, especially Oregon's rural economy.

Associated Oregon Hazelnut Industries is an organization of hazelnut growers and handlers who deal with legislative and political issues that may impact the industry.

Oregon Women for Agriculture (OWA) was organized 50 years ago by Willamette Valley farm women who were concerned with regulatory issues impacting the grass seed industry. Since that time, this all-volunteer group has broadened its scope to include nearly all facets of agriculture and areas of our state. There are more than 300 members in eight chapters across the state. The mission of OWA is Working together to communicate the story of today's agriculture.

Agriculture is the Cornerstone of the Willamette Valley

The Willamette Valley is the most populated area of the state and is also home to the most diversified and intensively farmed agricultural regions. Approximately 70 percent of Oregon's population is in the Willamette Basin and approximately 85 percent of that population in the Willamette Basin is supported by public water systems.

The Willamette Valley is home to more than 19,000 farms spanning 1.5 million acres of farmland. The basin contains some of Oregon's most productive agricultural lands. Oregon proudly produces more than 225 products in the Willamette Valley, in a globally unique growing region that allows such diversity to thrive. According to the 2017 United States Census of Agriculture[1], the Willamette Valley makes up 47% of Oregon's total agriculture sales. The market value of products sold in the Willamette Valley represents more than $2.3 billion in farm gate value. Oregon is number one nationwide in the production of twelve commodities (blackberries, blueberries, boysenberries, hazelnuts, potted florist azaleas, rhubarb, Christmas trees, sugar beet for seed, orchard grass seed, crimson clover, red clover seed, ryegrass seed and fescue seed) and number two in nationwide production for five other commodities (black raspberries, Austrian winter peas, pears, peppermint, and spearmint). Nursery products raised in the Valley decorate landscapes all along the eastern seaboard. Grass seed, grown in the heart of the Valley is featured on some of the most prominent golf courses and the National Mall. In addition, the Willamette Valley was also recognized as the Wine Region of the Year by Wine Enthusiast Magazine.

[1] See 2017 Census for the Willamette Valley counties, attached.

The Willamette River and her basin is a central pillar of Oregon's diverse natural resource base and the ecological landscape, while providing the water resource that sustains our cities and communities. The basin extends approximately 187 miles from its headwaters in the south to the north, where the Willamette River flows into the Columbia River. The basin is more than 11,200 square miles, averages 75 miles in width and encompasses approximately 12 percent of the total area of the state. Thirteen of Oregon's 36 counties intersect or lie within the boundary of the Willamette River Basin. The decisions made by the Corps in this system review will have a long-lasting impact on the vitality of Valley agricultural production.

Willamette System Operation Greatly Impacts Agriculture

The Corps' thirteen federal reservoirs in the middle and upper Willamette Basin provide critical flood control and irrigation water for farms in the Willamette Valley. The Willamette Valley System dams are critical to protecting farms, homes, and communities from growing flood risk, particularly as weather patterns become more extreme. For example, our members were greatly impacted by the releases from the dams earlier this year during high flow caused by spring storms. To that end, it is critical that the dams retain their primary function of flood control, and that any adjustments made to system operations do not reduce or alter flood mitigation capacity.

However, the balance between flood control and water storage has always been a delicate one and is of critical importance to agriculture in the Valley. Presently, the water in the System is stored under Bureau of Reclamation water rights that authorize storage for irrigation. Recognizing that the water stored in this System is the last available water in the Willamette Valley, our organizations have been closely participating in the Willamette Basin Reallocation.

Through that process, we have consistently advocated for ensuring that agriculture's future water demand will be met through available water allocated to irrigation. Despite our advocacy, the Corps is proposing to allocate a mere 327,650 acre feet of the nearly 4.4 million acre feet of agricultural demand on the Willamette Valley System, even though models predict that 2.5 acre feet of water per acre will be deficient in future years. Even more concerning, the Corps is unable to provide certainty that the allocated water will be available to agriculture – even in years of peak storage – due to the Endangered Species Act. This outcome is unacceptable to the agricultural community and will result in significant impacts to our state's most productive agricultural region.

To that end, we hope the Corps recognizes the importance of maintaining – at a minimum – existing storage capacity in the Willamette Valley System, presently 1.64 million-acre feet. This storage capacity must be maintained during the same period as historic operations, and at the same level as historic operations. Maintenance of this storage capacity is particularly important in light of the proposed increased use of the System by a multitude of new users after the completion of the Willamette Reallocation. Those new users will be seeking to transfer a portion of the water rights currently held for irrigation to those new

uses, and in so doing could impact existing users further down the Willamette Valley System.

We understand that a big reason for the review of the Willamette Valley System has to do with ongoing consultations with the National Marine Fisheries Service regarding the impact of the Willamette System on protected salmonid species in the system. We strongly encourage the Corps to keep at the forefront of its review protection of the Congressionally authorized purposes of the System and evaluate alternatives that meet fisheries needs while protecting and promoting non-fisheries related uses of the system, chief among them flood control and irrigation. The Corps is already proposing to allocate nearly 70% of the stored water to meet fisheries needs. In light of the multiple objectives of the System, the Corps should not make any further changes to the System that impact flood control or irrigation.

Further, we note that during the Willamette Reallocation process, we asked a number of questions about implementation of the Reallocation that the agencies involved in the process have been unable or unwilling to answer. These include basic questions around how the "share the pain" model for the Reallocation would work during times of shortage; how contracts would be administered, particularly between "new" users on the system and the existing agricultural contracts; whether users forced to covert from live flow to storage rights would be given a contract preference; how regulation downstream would occur; how the fisheries flows would be administered; and whether the fisheries flows are going to be subject to change as ESA consultations occur. To date, none of these questions have been answered. The answers to these questions have the potential to determine whether and to what extent changes proposed as alternatives in the Willamette Valley System review would impact agriculture in the basin.

Without additional information on the proposed alternatives, we are unable to offer more specific comments on the Willamette System review at this time. As you develop alternatives, we encourage you to ensure that the alternatives are not altering either the flood control or water storage capacity of the System in a manner that will impact communities or reduce the amount of water available as part of the Reallocation.

Due to the very low amount proposed to be allocated to agriculture as part of the Reallocation, our members are very concerned about their ability to access and reliably use the last available water in the Willamette Valley. Without certainty around this water, we will be unable to reliably grow many of the 225+ commodities we produce, which would have spillover effects on a local, national and international scale. Agriculture needs both a larger share of the water available on the system and certainty that that amount of water will be available into the future. While the System review does not have the ability to impact the allocation of the water, it has the potential to greatly impact water availability and overall storage on the system. We strongly encourage you to develop alternatives that protect flood control, address levee and revetment impacts and provide adequate agricultural water supply in the review process.

Thank you for the opportunity to comment and please do not hesitate to contact us if you have any concerns.

Sincerely,

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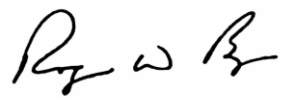

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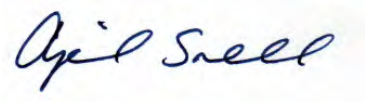

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[Non-DoD Source] Willamette EIS

Paul Mikesh <Paul.Mikesh@pgn.com>

Sun 5/26/2019 7:30 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

Given the fact that the Willamette system has ESA listed runs of Spring Chinook and Winter steelhead I'm curious why the biological opinion for the system has never addressed controlling the Pike Minnow population like that on the Columbia River.

I use to fish the Willamette above Newberg and we caught large numbers of Pike Minnow along the rip rap banks of the river that were built by the Corps to channelize the river. Since these fish were recognized to be a predatory specie on juvenile salmon and steelhead in the Columbia then why not in the Willamette?

Seems to me we could potentially protect millions of salmon and steelhead smolts by controlling the Pike Minnow population in the river.

Paul Mikesh
Columbia City, OR
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4 January 2018

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(delivered via email to: willamette.eis@usace.army.mil

District Engineer
U.S. Army Corps of Engineer District, Portland
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P.O. Box 2946
Portland, Oregon 97208-2946

Subject: EIS Scoping comments for Willamette Valley System Evaluation

These comments are provided to the United States Army Corps of Engineers (USACE) as project proponent and lead federal agency investigating the continued operations and maintenance of the Willamette Valley System in accordance with authorized project purposes.

1. Forecast Informed Reservoir Operations

USACE has adopted the use of Forecast Based Reservoir Operations (FIRO) to enhance management for flood storage in reservoirs in location on h west coast. In essence, using factors such as weather forecasts, basin wetness, etc., operators can release stored water in advance of a large incoming storm and retard unnecessarily high releases in the receding limb if a storm hydrograph. In doing so, an increase inf flood risk management benefits, and in certain cases, an increase in conservation storage, can be accomplished using the existing infrastructure. Use of FIRO would involve conducting review and modification of the Water Control Diagram and possibly the Emergency Spillway Release Diagram for each reservoir. I believe that such a review is already required by USACE policy. The EIS could approach the system wide FIRO application on a programmatic scale leaving each reoperation study the lighter lift of an EA for any impacts beyond those disclosed in the EIS. A great technical resource on the application of FIRO, if Portland District has not yet fully explored this topic, is Joe Forbis, USACE Sacramento District, Chief of Water Management.

2. Fish & Wildlife

The continued use of flows indicated in the Endangered Species Act Biological Opinion (BiOp) as the measure of fish & wildlife requirement may be flawed as a long-term operational approach.

- A primary objective of the Willamette Valley Project is the provision of flows for fish & wildlife.
- In the past, USACE studies (Willamette River Basin Review Study) used of BiOP demand as representative of the fish & wildlife allocation as reasonable for purposes of analysis and at one point actually defined fish & wildlife demand as those required to meet the BiOp.
- Using that definition, should the Endangered Species Act be modified in law (or even repealed) over the project life, the fish & wildlife allocation would be ill-defined or even be eliminated.

- Recommendation: State as an environmental commitment that flows for fish & wildlife and those for Endangered Species are not strictly linked. BiOp demand will be the priority for the fish & wildlife flows, but that if in the future BiOp flows are reduced under law or species recovery, the fish & wildlife flow will remain at the previous (current to the time of the EIS) level of BiOp flows.

3. Sustainable Rivers

The Willamette River is one of sixteen projects between USACE and The Nature Conservancy that represents an ongoing effort to operate USACE dams to achieve more ecologically sustainable flows, while maintaining or enhancing project benefits. While there could be some overlap or synergistic effects, ecological flows should not be confused with flows required by the NOAA Fisheries BiOp. The inclusion of these environmental flows in Willamette Valley System operation is not contrary to project authorization as part of the authorized fish & wildlife objective. Ecologically sustainable flow is clearly within the scope and policy in the preparation of EIS alternatives. The EIS analysis should include the healthy inter-relationships of sediment, temperature, nutrient, and connectivity, along with healthy-river based socioeconomic benefits.

4. Toxic Algae

Toxic Algae, as known as blue green algae, is an ever increasing a reality of Willamette System operations. The EIS should address Toxic Algae Management Plan. This management plan should include monitoring, communication/notification, and mitigation. Mitigation may include closure of all or part of reservoirs affecting recreation, drinking water supply and other effects. Future mitigation may include treatment of a reservoir as the technology improves.

Please email at phil.brozek@gmail.com or call at 916-995-3929 if you have questions.

Thank you

Phillip F. Brozek, P.E.

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June 28, 2019

RE: Willamette Valley System Environmental Impact Statement Scoping

In response to the U.S. Army Corps of Engineers (Corps) notice of intent to prepare an environmental impact statement (EIS) for the Willamette Valley System (WVS) operations and maintenance, the Public Power Council (PPC) offers the following comments. PPC represents most of the preference customers purchasing power from the Bonneville Power Administration (BPA) who would ultimately fund approximately half of costs associated with Willamette Valley Projects. As a result, PPC and its members have a strong interest in robust EIS evaluation to determine the most cost-effective and biologically sound measures for continued operations and maintenance of the WVS that meet environmental obligations.

This EIS is an opportunity for the Corps to weigh all economic, social, and environmental impacts in determining a preferred action that forges the path forward for the Corps and region in the WVS. Until the EIS is completed and a comprehensive plan for continued operations of the WVS is completed, the Corps should not address isolated issues through expensive capital measures that may not prove useful upon completion of the systemwide EIS.

Sequencing of WVS Processes Should Follow System EIS

Given the magnitude of costs associated with the efforts across the WVS and the impacts these costs will have on regional ratepayers and taxpayers, the Corps should use this EIS as an opportunity to reset and influence its other plans throughout the system. Specifically, the Environmental Assessment of the Cougar Dam downstream passage facility and the Detroit Project environmental impact statement should be informed by the systemwide EIS, not the other way around. The proposed capital projects linked to these narrower processes could be improved and a better incorporated part of a broader mitigation strategy. In resetting the table with the systemwide EIS, the Corps has an opportunity to properly sequence the necessary processes and subsequent actions in the Willamette. Doing so would give the region greater faith that the Corps has a deliberate management approach in the WVS.

Further, properly sequencing WVS processes would exhibit that there is a clear expectation of effectiveness of the action that comes from the EIS. Projects within the proposed action would be viewed as needed pieces of a bigger plan instead of one-offs intended to address specific issues without consideration of the broader effort. Without appropriate sequencing of its efforts in the WVS, we believe it will be difficult for the Corps to achieve the technical, biological, and economic objectives it expects from this process.

Holistic Management of the Willamette Valley System

Although the Corps is not responsible for all management within the Willamette Basin, the EIS should consider all management actions and how they are complementary or detrimental to Corps' efforts and vice-versa. For example, while hatchery and harvest management actions are not a Corps responsibility, the EIS should consider these elements to ensure management actions are coordinated, or at least appropriately weighed when developing a long-term WVS plan. As a result, we believe it is appropriate to consider hatchery production program goals and harvest management as part of the EIS in order to understand their impacts and interplay with the resultant proposed action.

The Corps should also work closely with BPA as a cooperating agency in EIS development to produce a thorough analysis of multi-operational effects on power generation. This may include but should not be limited to: economic and biological impacts of operating the system for flood control and water supply purposes, other renewable resource integration, and greenhouse gas impacts.

Additionally, the EIS should consider:

- The most cost-effective options to meet downstream temperature and fish passage requirements,

- Opportunities to modify existing revetment to benefit floodplain function and improve juvenile fish productivity (e.g., set back revetments to flood capacity and improve habitat connectivity and function),

- Adaptive management options allowing for course changes if proposed actions do not meet intended conservation goals,

Clarification of the Effectiveness Standard

PPC understands the Corps' need to meet its mitigation obligations at projects within the WVS. That said, actions should not be implemented unless they appear to meet a clear effectiveness benchmark. For example, the Corps is moving forward on costly downstream trap-and-haul facilities within the WVS without having clearly shown the benefit of these expensive projects. As part of the EIS and as part of the Corps' own proper business practices, it should clarify the effectiveness standard of its recommended actions.

This is to say that as part of moving ahead with costly projects, within the design and planning process, the Corps should clearly show the region its expected measure of effectiveness of the proposed action. If the action does not meet a high-percentage threshold that the action will meet its goals, the Corps should reassess its options to find a better way forward. Merely hoping an action will succeed is unacceptable, especially when they are as costly as those currently proposed in the system.

Providing a clear decision matrix and sharing it at all management levels within the Corps, as well as publicly, is necessary for success in the WVS. With BPA ratepayers under great pressure to competitively serve their customers and with diminishing Congressional appropriation dollars available, the Corps cannot afford to fund projects without high certainty of effectiveness. The way forward set by this WVS EIS can provide the Corps and the region greater certainty of future success.

Conclusion

BPA's customers stand behind solid management principles at both their local utilities and at the regional level. If the Corps will also embrace these principles, we believe it can chart a reasonable path toward meeting its obligations in the WVS.

We appreciate your consideration of these comments and look forward to working with you and your cooperating agencies in developing an alternative that provides the best management direction for the Willamette Valley System.

U.S. Army Corps of Engineers, CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946

June 25, 2019

Dear Suzanne et al.,
Thank you for this opportunity to offer scoping comments on your proposed Environmental Impact Statement on the Continued Operation and Maintenance of the Willamette Valley Project (WVP). My primary interests lie in the survival and recovery of the Valley's native anadromous salmonids, Upper Willamette River (UWR) Chinook salmon and (UWR) steelhead, both listed as threatened under the Endangered Species Act and both strongly affected by the WVP. I also have an interest in future water use in the basin and the potential role of the Project to meet those demands in an environmentally sound manner.

General Comments

1. It is unclear from your invitation to provide scoping comments whether the potential for reallocation of conservation storage is within the scope of actions you are considering. Any reallocation of stored water would affect project operations and thereby their effects on ESA-listed species. I offer a comment at the end of this letter on future out-of-stream water demands and the WVP's possible role in meeting them. At present, less than 80,000 acre-feet of water delivery is contracted at the WVP. Total WVP conservation storage tops out at almost 1,600,000 acre-feet and the Corps attempts to fill that storage by mid-May each year. Because storing water in project reservoirs has adverse effects on juvenile reservoir and dam passage survival and water quality, the alternative of capping water delivery contracts at current levels and revising project operations to have a high probability of meeting those contracts and downstream instream flow needs while minimizing storage should be considered.

2. In order for an alternative to be considered feasible and implementable, it must be shown to avoid jeopardizing the continued existence of ESA-listed species, or adversely modifying their critical habitat. Hence, each alternative considered should be analyzed for its effects on: each affected independent population's viability, WVP-wide effects on each affected ESU or DPS, and effects on designated critical habitats for each listed species.

3. Available data show both a long-term downward trend and a recent steep decline in the abundances of UWR Chinook salmon and steelhead (See *Declaration of Kirk Schroder Case No. 3:18-cv-00437-JR U.S. Dist. OR 2019*). The quality and timing of discharges at the dams and the severe reduction or elimination of passage to and from historical spawning and rearing habitats upstream of the dams strongly contribute to these declines.

4. The recent declines call for protective measures that could be implemented quickly (e.g. drawdown with safest passage route discharge priority) and timely development of more robust structural measures. Implementing effective structural passage improvements has proven to take a lot of time (5 to 10 years), from design to build. The EIS should emphasize immediately implementable measures, using existing facilities, to aid in the survival of the species in the near term, and an aggressive time-line for structural measures that would facilitate passage over a wider set of conditions but require both time and money to complete.

5. The WVP dams affect the likelihood of survival and the potential for recovery of the species in several ways: by blocking and inundating prime spawning habitats; by creating reservoirs that impose biological (predation and disease), physical (slow travel times), and water quality (high temperatures) limits on juvenile survival; by modifying downstream flow timing and water quality; and by preventing the flows of sediment and woody debris. While these effects were addressed in prior NEPA/ESA documents, many of the adverse effects remain and all need to be revisited.

6. The low level of juvenile survival through the WVP's dams and reservoirs greatly reduces the utility of critical habitats upstream. Hence, improving juvenile dam passage survival should be a focus of protective measures considered.

   Fish passage studies conducted throughout the project demonstrate that the highest rate of juvenile emigration through project reservoirs takes place at and near the minimum conservation pool elevation which occurs during drawdown in the fall and winter months, while fish enter the reservoirs throughout the year but mostly in the spring and summer months. This lack of safe, volitional passage during the spring forces juveniles that enter then to reside in project reservoirs throughout the warm summer months when predation, disease, and water quality issues limit their survival. UWR Chinook salmon display two distinct life history strategies. Some juveniles leave their natal streams in the Willamette Valley a few months after emergence as subyearlings, while others, termed yearlings, stay in the river for up to a year after hatching before emigrating. By precluding timely volitional passage, the WVP strongly affects survival of both cohorts, but may also tend to skew populations toward fish displaying the yearling migration strategy by preventing expression of the subyearling strategy. Studies have also shown that the longer fish are in the reservoirs the lower the cohort survival. The seasonal draft and refill operation of the project strongly affects fish passage timing and survival through the project.

7. Although available models and scientific judgement are very useful to estimate likely effects, any alternative adopted should include an extensive research, monitoring, and evaluation program, coupled to adaptive management to ensure survival goals are being met, and to help identify remedial measures if they are not.

A Fish Friendly Alternative

The long-term goal should be to make the dams and reservoirs as invisible to fish as possible by providing safe, timely, and effective passage; and by providing high quality water in the reservoirs and downstream. Because experience has shown that developing juvenile collection and passage systems at WVP dams that would function well over a wide array of conditions is at least 5, and more likely 10 or more years away from the when the final EIS issues, I recommend an alternative that would provide juvenile passage survival improvements as soon as implemented, and an opportunity for evaluation and comparison to other approaches. The interim measures specified below could, and to the extent possible, should be implemented immediately and remain in place until structural juvenile collection and passage systems are completed and shown to be effective. In the proposed fish friendly alternative below, I recommend implementing both deeper seasonal drawdowns at several projects and year-round drawdown at one to improve juvenile emigration and dam passage. Each of these measures should include a monitoring and evaluation program to inform future management.

Interim Measures

1. Improve volitional downstream passage for juvenile fish using existing facilities.
    a. Annually draw down Detroit reservoir to the regulating outlet invert elevation (1,370') by November 15 and hold until December 15, and prioritize discharge through the regulating outlets over power turbines for that time. This measure would:
        i. Provide outmigrating juvenile Chinook salmon and steelhead access to the safest means of passing Detroit Dam under current dam configuration (the regulating outlets) during the higher passage period of the year (fall/winter).
        ii. Reduce juvenile travel time through Detroit Lake by reducing the cross-sectional area of the lake, thereby improving juvenile passage survival and condition. This travel-time reduction would be substantial for fish that enter the lake in the fall and modest for fish that enter the lake in the spring. This would also reduce the time that juveniles are exposed to parasitic copepods in Detroit Lake that can harm and kill juvenile salmon and steelhead.
        iii. Likely not provide the same level of benefit as a system that safely and effectively collected and passed fish more frequently.
        iv. Increase the amount of storage available for flood events during the 30 days of deep draft operation, potentially benefiting flood damage reduction and water quality by reducing spills and thereby adverse TDG during flood events.
        v. Reduce electrical generation during the period of prioritizing the regulating outlets and refill.
        vi. Slightly reduce the likelihood of refill during dry years.
    b. Annually prioritize discharge through the regulating outlets at Green Peter from November 15 through January 31 to enhance juvenile passage; and reinitiate transporting a portion (determined in consultation with NMFS) of the UWR Chinook salmon and steelhead collected at the Foster trap to release points upstream from Green Peter reservoir. This measure would:
        i. Restore UWR Chinook salmon and steelhead to the Middle Santiam River upstream of Green Peter Dam.
        ii. Provide outmigrating juvenile Chinook salmon and steelhead access to the safest means of passing Green Peter Dam under current dam configuration (the regulating outlets) during the higher passage period of the year (fall/winter).
        iii. Likely not provide the same level of benefit as deeper drafts or a system that safely and effectively collected and passed fish more frequently.
        iv. Reduce electrical generation during the period of prioritizing the regulating outlets.
    c. Draw down Cougar reservoir to the regulating outlets (elevation 1,505') by November 15 and hold until December 15. Maintain Cougar reservoir at minimum conservation pool (1,532') from March 1 to May 1 and prioritize use of regulating outlets over power turbines for that time. This measure would:
        i. Provide outmigrating juvenile Chinook salmon access to the safest means of passing Cougar Dam under current dam configuration (the regulating outlets) during period of the year when the numbers passing the dam are highest.
        ii. Reduce juvenile travel time through Cougar reservoir by reducing the cross-sectional area of the lake, thereby improving juvenile passage survival and condition. Maintaining lower water surface elevation in the spring (March 1 through May 1) coincides with juvenile entry, allowing for rapid passage and

maintenance of life-history diversity. This measure would also reduce the time that juveniles would be exposed to parasitic copepods and predatory fish in Cougar reservoir.

iii. Likely not provide the same level of benefit as a system that safely and effectively collected fish more frequently.

iv. Increase the amount of storage available for flood events during the 30 days of deep draft operation, potentially benefiting flood damage reduction and water quality by reducing spills during flood events.

v. Reduce electrical generation during the period of prioritizing the regulating outlets and refill.

vi. Slightly reduce the likelihood of refill during dry years.

d. Draw down Lookout Point reservoir to the regulating outlets (elevation 750') by November 15 and hold until at least December 15 and provide free, ungated spill at Lookout Point dam for 2-4 weeks in spring (tentatively March – April, dates to be determined in cooperation with ODFW and NMFS,). This measure would:

i. Provide outmigrating juvenile Chinook salmon access to the safest means of passing Lookout Point Dam under current dam configuration (the regulating outlets and spillway) during period of the year when the numbers passing the dam are highest.

ii. Reduce juvenile travel time through Lookout Point reservoir by reducing the cross-sectional area of the lake, thereby improving juvenile passage survival and condition. Maintaining lower water surface elevation (near spillway crest) in the spring (March 1 through May 1) coincides with juvenile entry, allowing for rapid passage and maintenance of life-history diversity. This measure would also reduce the time that juveniles would be exposed to predatory fish in Lookout Point reservoir.

iii. Likely not provide the same level of benefit as a system that safely and effectively collected fish more frequently.

iv. Increase the amount of storage available for flood events during the 30 days of deep draft operation, potentially benefiting flood damage reduction and water quality by reducing spills during flood events.

v. Reduce electrical generation during the period of prioritizing the regulating outlets and refill.

vi. Slightly reduce the likelihood of refill during dry years.

e. Maintain the water surface elevation at Fall Creek reservoir at or below 685 feet year-round except as needed to provide downstream flood damage reduction benefits. This measure would be permanent and would:

i. Provide outmigrating juvenile Chinook salmon access to the safest means of passing Fall Creek Dam under current dam configuration (the regulating outlets) year-round thereby increasing dam passage survival and facilitating expression of migration cues when they occur, improving life history diversity.

ii. Reduce juvenile travel time through Fall Creek reservoir by minimizing the cross-sectional area of the reservoir and converting much of Fall Creek to free-flowing, thereby improving juvenile passage survival and condition.

iii. Expose long segments of Fall Creek upstream of the dam, extending available spawning habitat.

iv. Increase the amount of storage available for flood events by drafting the project deeper.

v. Provide the least possible effect on critical habitat throughout Fall Creek while increasing the downstream flood damage reduction benefit.
vi. Eliminate refill and summer flatwater recreation at Fall Creek reservoir. However, other forms of recreation would be improved.
vii. Facilitate revegetation of the reservoir footprint and stabilization of the Fall Creek channel upstream from the dam. Under current temporary drawdown operations, drawdown exposes large areas of unvegetated sediment and considerable sediment is entrained in the project's discharge stream. This adversely affects both water quality (turbidity) and channel morphometry (aggradation). Because over 50 years of sediment has accumulated in the reservoir footprint, there is ample supply to continue this process if not arrested. By eliminating refill and inundation of the reservoir footprint, a permanent drawdown would facilitate revegetating the disturbed reservoir footprint and stabilizing the active channel banks, thereby reducing sediment movement.
viii. Finally, because this measure is very likely to be highly successful, information gleaned through research, monitoring and evaluation would provide valuable information to improving passage survival at other facilities.

2. Improve downstream water quality using existing facilities.
    a. Use the lower and upper regulating outlets at Detroit Dam as needed to control discharge water temperatures and prioritize meeting downstream water temperature targets over power generation during the fall. This measure would improve the reproductive success of Chinook salmon that spawn downstream from the project.

3. Each of these measures should be implemented at the initiation of ESA consultation, or sooner, until supplanted by other measures (e.g. fish traps) that are shown to provide greater fish benefit.

Long-term Measures

4. Existing summer minimum discharge rates and interim water temperature control operations are predicated on reservoir refill. As juvenile dam and reservoir passage survival is adversely affected by project refill and storage, these predicates should be thoroughly reconsidered. In particular, minimum flow requirements during July and August are generally much higher than inflow during those months, requiring deliveries from storage. Summer flows generally serve adult migration and holding and juvenile rearing needs. Studies conducted by the Corps have shown that much lower flows, flows similar to inflow, could meet those habitat needs. Developing an instream flow regime that minimizes the need for stored water would benefit juvenile reservoir and dam passage, improving the opportunity to restore fish to habitats upstream of the dams.

5. Evaluate flood damage reduction operations to determine if more moderate operations could provide the same flood and project protection as current operations with less severe impacts on streamflow and fish habitat. Specifically, currently during flood events the Corps reduces project discharge by storing incoming water, then releases the stored water once the peak flow has passed and the flood risk abated. In the past this has resulted in the project going from minimum discharge to very high discharge rates very fast. This is hard on the ESA-listed fish and

other aquatic biota. At times, such operations are prudent as one storm can come after another and storage is needed quickly. At other times, storm events are spaced out and such operations are overly harsh. The Corps should evaluate using available meteorological and hydrological data, predictive models, and professional judgement to reduce the difference in discharge during and immediately after flood events.

6. The Corps and NMFS should develop and implement a long-term WVP configuration and operation plan that provides a high potential for recovery of the species. Such a plan will include both water temperature control and fish passage systems and an aggressive time-line for design and construction of these facilities, as well as a protective instream flow regime. However, it is clear that full implementation of a long-term solution will take more than ten years and additional interim measures to those listed above may be appropriate. The alternative adopted should provide for adaptive management throughout the duration of the proposed action.

Water Resource Development

Water demands in the Willamette Valley are growing and the WVP's storage is being sought to serve those demands. There are obvious conflicts between meeting out-of-stream water demands and fish survival and recovery needs, and because summer flows are low and both instream and out-of-stream demands high, summer water use is likely to create the strongest conflicts. Because juvenile dam and reservoir passage survival is strongly affected by reservoir water surface elevation, the dedication of conservation storage at WVP reservoirs to out-of-stream use would create conflicts, as would the development of additional in-channel storage facilities by others. A better solution to meet summer water demands in the Valley with a minimum of conflict with the survival and recovery of ESA-listed fish would be off-channel storage or rechargeable well-fields. High winter flows could be safely diverted to off-channel storage facilities, or designated recharge areas, which could then be tapped to augment current diversions of live flows to meet summer demands. WVP operations could then be managed to enhance such diversion opportunities during the fall and winter with no more than minor effects on fish. Further, for potable water use, water delivered during the winter would be free of cyanotoxins, which have curtailed summer water diversions in the recent past. Increasing the use of water collected during the winter would thereby improve water surety, and reduce human health risk and treatment costs.

These are my personal comments and should not be construed as those of any other party or organization. I cannot emphasize enough the need to implement significant interim measures as soon as possible as the current population trajectories are poor and delay risks further decline and possible extirpation. My comments above reflect this concern. Please put me on the service list for this EIS.

Sincerely,

Richard Domingue
Box 68956
Oak Grove, OR 97268

[Non-DoD Source] EIS, draft scoping comment, to the record, June 24, 2019, Benton County, Oregon.

tweet37@juno.com

Mon 6/24/2019 5:09 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

I shared inquiry to website email and have heard nothing back. June 13, 2019 and a follow up on June 20 2019 and heard nothing back.

Is the old EIS available? Will the new EIS please show the changes made to the old EIS as Track changes?
If I did not make any of the June 2019 public meetings, is there a way to see the presentation and or presentation materials on line?

Thanks, R.Foster

Public comment to Scoping for Draft EIS Willamette Valley Systems Operation and Maintenance.
June 24, 2019.
Not being able to see the old EIS, do not see it on Portland ACOE site.
Wondering how people may be notified of dam releases in the a.m. hours downriver of releases which will impact property, health and physical safety?
I looked on our local Benton County, Oregon website for this type of alert and found outdated material on public safety.

2019 flooding in Benton County Oregon could be a recent example of zero notification of dam releases to the mainstem
Willamette River system of x volume over y time from these facilities upstream of all these communities.
No warning was given of
dam water release for the 2019 flooding which occurred in Benton County, Oregon- Corvallis Oregon that I was aware of after, checking our local Benton County oregon webpage and the City of Corvallis Web Page for specifics related to flooding, and the NOAA Portland website. ACOE can share that x volume is released here and will reach this community at this time with this much overall rise in stage level at this river gage.

for example and am hours, no one was aware
of these additional CFS coming their way.

Extensive damage occurred in Corvallis from this release in the am hours, without
indication of release volume reaching x location in predicted time. People where asleep, and where surprised to see flood flow surrounding their homes in Benton County. NO one had time to sand bag and move stuff out of flooded yards.

ODOT may have also been unaware of pending increase in known volume additions to Willamette River mainstem system from these facilities releasing these CFS combined volume, and so may have been less able to prepare and or
prepare the working public for pending road closures and long delays in traffic movements at the Albany Oregon overpass.

Can the ACOE provide real time, factual public information to the public of CFS releases, alerting the public to water release volume and share an estimated time of arrival for this
extra system addition CFS with impact State agencies and Cities?

Using NOAA perhaps as a conduit/ for information about weather related releases could alert local weather
stations on TV/radio/social media to the fact that there is this release volume coming to hit a x time in y location and to be prepared with this led time
warning given to NOAA Portland, by ACOE Portland, Oregon.

Insurance wise loss may have already been totaled and is available for loss totals, from this 2019 flood in Benton County,
due to dam release flooding in early 2019 on mainstem Willamette River at Corvallis gage.

Water backup from this flood, up local creeks was excessive, more then in the last flood event which cased road closures in Corvallis, 2012? Marys River backed up, flooded Brooklane Drive in the AM. The city of corvallis public works may not have had time to close Brooklane Drive, so being a weekend, and in the AM, more property loss may have occurred on Brooklane Drive due to no road closure and cars moving through very deep flood flow water which was backed upstream from the mainstem Willamette River, to x point on the Marys River, to river mile ?

Erosion of Marys River river banks, and all other creeks may have been compounded due to water volume being so high and remaining high and backed up for a few days, lake like eating away at
all the local creeks and river banks for two and a half days.

I guess release and water flow backup, upstreams and rivers in the Willamette Valley will occur more and more with global warming.

So, it may be good business practice for ACOE to develop and use an early warning system for property owners, Cities and State agencies which have to operate around and within these flooded areas, and who will see direct negative impacts from know CFS volume

releases where there is time to warn all
downstream property owners, so they can better prepare their animals, homes, and property, and ODOT may be able to share
with commuters what will occur where and when. An alerted work force who are forced to commute to say, Corvallis can be better prepared say, by getting days off, getting a babysitter, looking for car pools, preparing for long commutes to and from work should ACOE have have shared alerts with all residents in the Willamette Valley.

Thanks, R.Foster 980 SE Mason Place, Corvallis oregon.

_____
All Natural CBD Oil Has Doctors Throwing Out Prescriptions
worldhealthlabs.com
Blockedhttp://thirdpartyoffers.juno.com/TGL3131/5d1149a2a981449a10b1cst02duc

From: tweet37@juno.com
To: Hill, Suzanne CIV USARMY CENWP (USA)
Subject: [Non-DoD Source] Re: Willamette Valley System EIS
Date: Tuesday, June 25, 2019 1:35:16 PM

Dear Suzanne,
Thanks, I see June public scoping meeting materials at the bottom of the website for EIS. I did email the portland ACOE website, twice, from the portland ACOE website, my email ends in juno.com so may have been removed as spam. June 11, 2019, june 21, 2019. Where is the original, historic, current EIS stored? Thanks, Rana.

---------- Original Message ----------
From: "Hill, Suzanne CIV USARMY CENWP (USA)" <Suzanne.Hill@usace.army.mil>
To: "tweet37@juno.com" <tweet37@juno.com>
Cc: CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>
Subject: Willamette Valley System EIS
Date: Tue, 25 Jun 2019 01:27:13 +0000

Hello-

Writing to let you know we received your email this afternoon. You reference emails that were sent previously (06/13 and 06/20), however we don't have a record of these emails. Please confirm that the right email address was used:

willamette.eis@usace.army.mil

Meeting materials from the public meetings are available from the project website:

Blockedhttps://www.nwp.usace.army.mil/Locations/Willamette-Valley/System-Evaluation-EIS/

Thank you!

_____
How to Stop Waking Up Every 2 to 3 Hours
howtoimproveyoursleep.com
<Blockedhttp://thirdpartyoffers.juno.com/TGL3132/5d12851e441f751e5d16st03duc>
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<Blockedhttps://d32oduq093hvot.cloudfront.net/icons/sponsoredlinksby.png>

[Non-DoD Source] question about economic analysis

Ryan Thompson <ryan@mtnaireng.com>

Wed 6/5/2019 5:31 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

To whom it may concern,

I would like to know more information about the Willamette Valley Project economic estimates that are posted on the Army Corps website and in fliers. For example, the Corps states that the Willamette Valley Project saves the Willamette region $1 billion per year. The Corps also reports estimated economic savings attributed to each dam. I have also seen estimates by the Corps about the economic benefit to Oregon's economy due to recreation from the Willamette Valley Project. Can you share any reports or background information that explain how those estimates were calculated? If not, then can you answer specific questions I have about how those estimates were calculated?

Thanks,
Ryan Thompson
Dorena, OR

[Non-DoD Source] Comment: Willamette Valley System (WVS)

Shannon Millington <slynemillington@gmail.com>

Thu 4/4/2019 7:47 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

To Whom It May Concern,

I am emailing to express my recommendation that all efforts be made to enable salmon to swim all the way up to through the Willamette River tributaries. As a homeowner in the town of Oakridge, I believe this would create a positive impact on both the ecology and economy of the area. I understand that this review is taking into consideration the Lookout Point Dam, and I would further encourage that the Hills Creek Dam also be evaluated with a remedy made.

I believe any effective solution must take into account natural spawning behavior of the fish and allow them to move beyond these dams in a timely and safe manner (e.g. wide and accessible fish ladders as preferable to trucking them around).

Thank you for your consideration and for making a positive change for this region.

Shannon Millington

Testimony (TS / TSPA)	BHCN Testimony USAP Willamette Valley System Operations and Maintenance EIS Ver: 02		
Date Rels: 2019 Jun 28 Friday 17:00 U [5:00 PM PT]		Date Anot: 2019 Jun 28 Friday 22:00 U [10:00 PM PT]	
TS = Testimony, PA = Orient: (P) Portrait, Sheet: (A) Letter	V	S3Pg: None	S1Pg: BH_Kn_CE_19-01_WVSOM
Link: 2019_Jun_BHCN_TSPA_WVSOM_EIS_Scpng	02	PostS2Pg: BH_Kn_CE_WVSOM_Docs_2019	Site: BH_Kn_USACEPD_Projects

01 2019 Jun BH TS CE WVSOM EIS

Primary Contractions / Abbreviations

Item	Contraction	Expansion	Visit Gv Site	Visit BH Site
A	**BHCN / BH**	Birdshill CPO / NA (Nbhd = Neighborhood)	BH = BHCN	BH_Kn_Gv_Org_Nbhd_Accs
B	**USAP / USACEPD**	US Army Corps of Engineers Portland District	USAP, USACEPD, CE,	BH_Kn_USACEPD_Projects
C	**WVSOM**	Willamette Valley System O&M EIS (2019)	USACEPD_WVSOM	BH_Kn_CE_19-01_WVSOM
D	**WBR**	Willamette Basin Review (EA) (FS) (2017)	USACEPD_WBR	BH_Kn_CE_17-01_WBR
E	**EIS**	Environmental Impact Statement	EIS_wkpd	BH_Know_DOCS
F	**NEPA (US)**	National Environmental Protection Act (US/DOE)	NEPA_US_DOE	BH_Know_DOCS
G	**NEPA (Wiki)**	National Environmental Protection Act (1969)	NEPA_wkpd	BH_Know_DOCS
H	**NEPA Guide**	NEPA Citizen Guide ()	NEPA_DOE_CZ_Guide	BH_Know_DOCS
I				

Birdshill CPO / NA Visualization of USAP Willamette Valley System O&M (WVSOM) EIS <2019-2023>

Project Sites:
Official: **USAP_WVSOM**
Nbhd: **BH_Kn_CE_19-01_WVSOM**

Imag_USAP_Cottage_Grove_Resvoir
File / VIRIN: 090405-A-EZ675-0001JPG

Brochure: USAP WVSOM EIS Scoping Informational Brochure

Front Pg <Cover>

Back Pg

USAP WVSOM: Scoping_informational_brochure
BHCN Posting:
2019_Jun_USAP_BRPA_WVSOM_EIS_Scpng_BH

Public Testimony (TS) / Comment(s) of BHCN wrt USAP WVSOM

BHCN Icon

Document Type

2019_Jun_BHCN_TSPA_WVSOM_EIS_Scpng

Link(s):	Internal Link	**Internal Heading**	External Link	**External Link Note**	**Important Link**	

Table of Contents with document section access link(s):

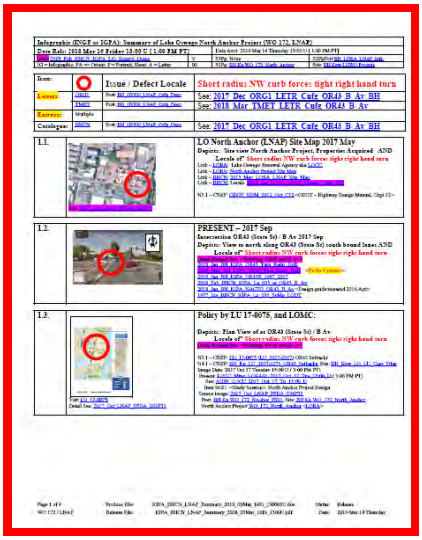
Item	Header Label and link to section	Comment(s)
01	2019 Jun BH TS CE WVSOM EIS	2019 Jun US Army Corps of Engineers Willamette Valley System OM EIS
		Willamette Valley System Operation and Maintenance EIS (2019- 2023) Summary
		Coalescing Documents for USAP WVSOM
		BHCN: Critical LNAP Docs for LORA Mtng 2019 Jun 18 Tue 15:00 U [3:00 PM PT]
05	USAP WVSOM EIS Scoping Docs	WVSOM Scoping Documents presented at OH on 2019 Jun 06 Thur 16:00 U
06	USAP WVSOM Website Docs	WVSOM Website Documents posted
07	FDFP Apndx D Floodplain Analysis	Docs / Websites wrt FDFP Floodplain Analysis
08	Docs/Sites wrt FDFP and TCWTP	Docs / Websites wrt FDFP and TCWTP impacting Willamette River Floodplain
09	Docs/Sites wrt Fed Floodplain Authority	Docs / Websites wrt ROW(s) Permitting Authority
10	Docs/Sites wrt Locale Floodplain Authority	Docs / Websites wrt Flood Plain Authorities
11	Sites / Docs wrt OSU PNERC WRBPA	Docs / Websites wrt OSU PNERC 2002 Willamette River Basin Planning Atlas
12	Docs/Sites wrt FDFP Report(s)	Docs / Websites wrt FDFP Reports and
13	Docs/Sites wrt Linked Projects	Docs / Websites wrt Linked, Related and Evolving Projects
14	Docs/Sites wrt Knowledge Base	Docs / Websites wrt Multiple Related Knowledge Base Topics
15	Empty – Not Used (1)	Empty – removed to reduce file size. See template file(s)
16	Project Headers and Scratch Pads	Empty – removed to reduce file size. See template file(s)

02 USAP WVSOM 2019 – 2023 Summary

Return to first page: 2019 Jun BH TS CE WVSOM EIS

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

02.01



NOT CREATED OR ANOTATED 2019 Jun 28 Friday 10:00 U

Title .....: Summary of Lake Oswego North Anchor Project
Subtitle …….: {WO 172, LNAP} LO North Anchor Project
Link BHCN .: 2018_Mar_BHCN_IGPA_LNAP_Summary <Source>
S2PgPost BH_Kn_WO172_LNAP_Smry, Site: BH_Knw_LOCG_WO_Projects
Illustrates ….: City of Lake Oswego downtown and urban renewal district
and project WO 172 North Anchor Project
Intersection: OR43 (Oregon Hwy 43) (State St), MP_06.04 / B Av
Issue / Defect with NW Corner (Short Radius turn)
Cross Reference: City of LO (LORA): WO_172 <LO North Anchor>
CRef Project City of LO (LOPL): LU 17-0075 <OR43 (State St) Setbacks>
CRef Birdshill CPO / NA (BHCN): BH_Kn_WO172_North_Anchor
CRef Birdshill CPO / NA (BHCN): BH_Kn_LU_2017-0075_OR43_Setbacks
WO 172 / LNAP = Configuration Changes – LOCC 2018 Jul 03 Tu 18:30 U Item 14.01
Time Chart of Actions
Meeting Link: LOCC_Mtng_195_2018_Jul_03_Tue_18:30_U (6:30 PM PT)
Interactive Agenda: AGIN_LOCC_2018_Jul_03_Tu_18:30_U (6:30 PM PT)
See Item 14.01 – North Anchor Project Update
Importance: Summary / Access
Document Attributes
Author …….: Charles Ormsby (Skip) Co-Chair Birdshill CPO / NA (BHCN, BH)
Date Created .. : 2018 Mar 16 Fri 13:00 U (1:00 PM PT) <Circa>
Date Published : 2018 Mar 16 Fri 13:00 U (1:00 PM PT) <Circa>
Date Annotated : 2019 Mar 15 Fri 09:00 U (9:00 AM PT) <Circa> Version: 02
Type .....: IGPA = Infographic (IG), Orient: Portrait (P), Sheet: Letter (US Size "A")
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Sheet (Paper) ….: A = US "A Size" (Letter), (w x h – 8.5 in x 11.0 in)
Size .....: 940 kb, Page(s): 1
File BHCN … IGPA_BHCN_LNAP_Summary_2018_03Mar_16Fr_1300U.pdf
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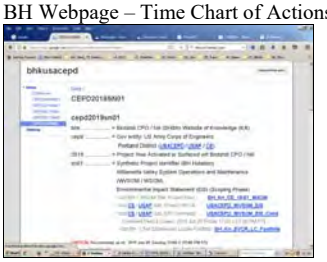
Z2019_03Mar_14Th_1500U_Cret_INGF_LNAP_Smry

02.02

BH Webpage – Time Chart of Actions



Title … : CEPD2019SN01
Birdshill CPO / NA Knowledge Page for
USACEPD / USAP / CE <Portland District>
Project: WVSOM EIS
Willamette Valley System Operations and
Maintenance Environmental Impact Statement

S1Page....: BH_Kn_CE_19-01_WVSOM
Site …….: BH_Kn_USACEPD_Projects

02.03

Drone view of: Foothills Park and Adjacent areas including TCWTP.

Webpage / Video Screenshot

Title …: Aerial View of Foothills Park in Lake Oswego Oregon
Video...: 2015_Jun_VIDO_PAGU_Foothills Pk_WLRM_020.3, Total: 3 mins
Locale ..: WLRM_020.3 north and downstream to WLRM_020.0 aprox.
Content: Drone view of Willamette River in vicinity of:
West Bank of Willamette River
Foothills Park, Tryon Creek Waste Water Treatment Plant,
Foothills District, Tryon Cove Park, Tryon Cove Park Annex
and UPRR – Lake Oswego Railroad Bridge (WLRM _020.0)
East Bank of Willamette River
Rivervilla Park, Oak Lodge Water Reclamation PlantTryon Creek
(WLRM = Willamette River Mile, Terms Visit: BH_Knw_WR_EV_Resource

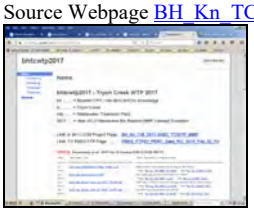
03 Coalescing doc(s) – WVSOM

Return to first page: 2019 Jun BH TS CE WVSOM EIS

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

03.01 Complete Research Annote Work Needed

Source Webpage BH_Kn_TCWTP_2017



Title .....: **LO Foothills District Key Constraints and Tryon Creek Wastewater Treatment Plant (TCWTP)**
Sub (Title 2) .: Foothills District
Link BHCN : 2019_Feb_BHCN_IGPA_KC_FDFP_TCWTP_BH
S2PgPost: BH_Kn_TW_MBR_IG_2019
S1Pg: BH_Kn_TWMBR_INGF , Site: BH_Kn_TCWTP_2017
Illustrates ….: Willamette River West Bank in vicinity of Foothills and Tryon Creek and BHCN
Importance: Flood mitigation limitations wrt 2012 FDFP vs. Stampher Road HOA/BHCN
Cross Ref BHCN .:Multiple – to be created <
Link BHCN : BH_Kn_EVCR_LC_Foothills and, LOPL:
Document Attributes
Author (s)…….: Charles Ormsby (Skip), Co-Chair Birdshill CPO / NA
Entity ……..: BHCN <Birdshill CPO / NA
Project BH_Kn_TCWTP_2017
Date Published : 2019 Feb 24 Sunday 18:00 U [6:0 PM PT]
Date Posted …. : 2019 Feb 24 Sunday 18:00 U [6:0 PM PT]
Date Annotated : 2019 Jun 28 Friday 21:00 U [9:00 PM PT] <Circa> <V01>
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Paper .....: PA = US "A Size" (Letter), (w x h – 8.5.0 in x 11.0 in)
Size .....: 125 kb, Page(s): 1
File BHCN ...: IGPA_BHCN_TWFD_MBR_2019_02Feb_24Su_1800U.pdf
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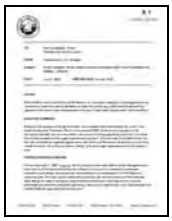
\ZZ_Act_2019x01\Z2019_01Jan_25Fr_1400U_Cret_INGF_FDFP_TCWTP

03.02 Essential

Council Report Source for Extract



Title .....: Figure 1-8: Future Foothills Development with Upgraded TCWTP <MBR2>
Sub (Title 2) .: Source: PBES / CH2M Hill TCWTP (CAS) 2014 Jun, Fig 7-3
Link BHCN .: 2018_Jun_PERC_XMBR2_TWFP_View_SW
S3PgPost: BH_Kn_TW_RP_2018_MBR2
S2Pg: BH_Kn_TW_MBR_RP_2018 S1Pg: BH_Kn_TW2017_MBR_RP
Site: BH_Kn_TCWTP_2017
Illustrates ….: Arial view of TCWTP_CAS (Conv Actv Sludge) and Foothills District
View to SW with boundary of OR43 [State St (LO)]
Importance: Support / Access
Cross Ref: LOCC 2018 Jun 19 Tuesday 15:00 U Agenda Item 06.01
PERC MBR Location 02 – Lakeshore Concrete, 100 Foothills Rd LO
Figure 1-8: Future Foothills Development with Upgraded TCWTP
Section 1 Overview, File Screen 24 of 64 <File msng Sec 03-10>
Document Attributes
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Entitities ……..: PERCW PERC Water (Costa Mesa CA) <Mods Ilus PBES / CH2M TCWTP>
Entity <Source>.: CH2M Hill Portland Office (Circ 2013 Acquired by Jacobs_Engr)
Date Published : 2018 Jun 19 Tuesday 15:00 U [3:00 PM PT] <Circa> <Mods Ilus>
Date Published : 2014 Jun 30 Monday 17:00 U [5:00 PM PT] <Circa> <Src Ilus>
Date Posted …. : 2018 May 31 Thursday 17:00 U [5:00 PM PT] <Circa> <LOCC_Pakt_Rels>
Date of LOCC .: 2018 Jun 19 Tuesday 15:00 U [3:00 PM PT]
Date Annotated : 2019 Mar 25 Monday 02:00 U [2:00 AM PT] <Circa> <V01>
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Fldr BHCN … C:\... \BH_CPONA\\050_LOCG\LOCC_Mtng\
\2018\2018_06Jun_19Tu_1500U_SS_LORA_TSTM

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

03.03 Research Annote Work Needed

2012 FDFP Report Section 5.3, Page 80

Section 5.0 Title Page	WDWD / LOED Source for Extract

NOT CREATED OR ANOTATED 2019 Jun 28 Friday 10:00 U

Title .....: **Foothills District Framework Plan (FDFP)**

Sub (Title 2) .: LOCC Adopted, RSLT 12-41 <Srce LOPL: LU_2012-0032>

LOPL: Exhibit F-4: Foothills District Framework Plan, Adopted 07/24/12 (Part 1)

BHCN : 2012_Jul_WDLE_Rept_FDFP_P1F2

Post LOPL: _____

NOT CREATED OR ANOTATED 2019 Jun 28 Friday 10:00 U

BHCN .: 2012_Jul_WDLE_Rept_FDFP_P1F2_BH <BDPA file >

S3PgPost: _____

S2Pg: BH_Kn_FDFP_Rept_Acss S1Pg: BH_Kn_LU2012-0032_FDFP

Site: BH_Knw_LO_LU_Projects

Illustrates ….: Evolution of FDFP without Metro LOPT Streetcar

Importance: 2012 Strategic (Vision) Plan effort for Foothills District

Cross Ref: LOPL Nbhd Snapshop Info circa 2011 FT / FTHL / Foothills - Not Rcgn

Visit: BH_Kn_Gv_Org_Nbhd_Accs

See: 2011_Jan_LOPL_SMPA_FTHL LOPL_PJ_FTHL LFTHL / LNAC / LOPN

Portland Bureau of Environmental Services (BES / PBES)

PBES_TCWTP Tryon Creek Wastewater Treatment Plant (Homepage)

City of Lake Oswego Department of Public Works (BES / PBES)

LOPW LOPW_TCWTP > BHCN: BH_Kn_TCWTP_2017 >

. Metro: MTRO_LIB_LOPT_Arch , BHCN: loptland

Document Attributes

Author (s).....: WDWD = WD =Williams Dame and White Developers

Entity .....: LOED = LE = LO Econ Development, Fnct Wrapped in to LORA Circa 2015?

LORA = LR = Lake Oswego Renewal Agency

Date Aprv LOCC: 2012 Jul 24 Tuesday 17:30 U [5:30 PM PT] <Circa> <On Doc Cover>

LO_Mtng / LO_Mtng_Archive <Laserfiche System>

Date Aprv LOPC: 2012 Sep 13 Thursday 17:00 U [5:00 PM PT] <Circa> <On Srce Filename>

LO_Mtng / LO_Mtng_Archive <Laserfiche System>

Date Published : 2014 Oct 24 Saturday 09:21 U [9:21 AM PT] <Circa> <Doc Metadata >

Date Posted .... : 2014 Oct 26 Monday 17:00 U [5:00 PM PT] <Circa> <Assume>

Date Annotated : 2019 Jun 28 Friday 10:00 U [10:00 AM PT] <Circa> <V?? / Linked>

Type .....: BDPA = Book of Docs, Orientation: Portrait (P), Sheet: Letter (A),

Parsing of source report sections to files less than 20,000 kb

Paper .....: PB = US "A Size" (Letter), (w x h – 8.5 in x 11.0 in)

Size .....: 24,767 kb, Page(s): 190

File LOPL: exhibit_f-4_foothillsl_framework_plan_final_09-13-12-adopted_07-24-12_part-1.pdf

WbPg LOPL LU_2012-0032, Item: Exhibit F-4

File BHCN ...: REPT_WDLE_FDFP_F-4_LOCC_Adpt_2012_09Sep_13Th_1700U.pdf

Fldr BHCN … C:\... \BH_CPONA\050_LOCG\LOPB04LU

\LU_12-0032_Dist_Plan_Spc_Foothills\03_WBPG_Files

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

03.04 Complete

Appendix D0, Item D0.00.02

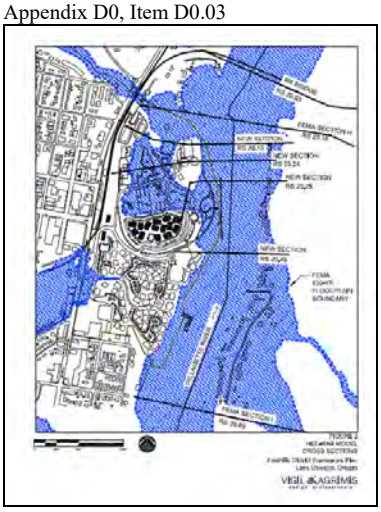
WDWD / LOED Apdx D: Extract Src	BHCN Catalogue for extract

Title .....: **Floodplain Base Map <LO Nbhds FH and BH>**
Sub (Title 2) .: BID002 – PLPA: VGAG: FDFP Floodplain Base Map, Scr: 310, DCPA Scr: 004

Link BHCN .: 2011_Jun_VG_PLPA_FPBase_W_D0_00_02_BH
S3PgPost: _____
S2Pg: BH_Kn_FDFP_Rept_Acss S1Pg: BH_Kn_LU2012-0032_FDFP
Site: BH_Knw_LO_LU_Projects
Illustrates ….: Flood Plain Analysis 2011 Sep floodplain conditions in FDFP area
Importance: Identifies / Outlines existing floodplains in FDFP due to Willamette Rv and Tryon Cr.
Cross Ref BHCN .: 2012_Sep_BHWL_DCPA_FDFP_P2F2_Apdx_BH <
Link BHCN : 2012_Jul_WDLE_Rept_FDFP_P1F2 , Post LOPL: _____
Src Link BHCN : 2012_Jul_WDLE_Rept_FDFP_P2F2 , Post LOPL: LU_2012-0032, Exhibit F-4
Document Attributes
Author (s)…….: ESA_VGAG = VG = Vigil Agrimis, Portland OR <Prev VGAG to 2013>
ESA = Environmental Science Associates (1969)
Entity ……..: WDWD = WD =Williams Dame and White Developer
LOED = LE = LO Econ Development, Fnct Wrapped in to LORA Circa 2015?
LORA = LR = Lake Oswego Renewal Agency
Date Aprv LOCC: 2012 Jul 24 Tuesday 17:30 U [5:30 PM PT] <Circa> <On Doc Cover>
LO_Mtng / LO_Mtng_Archive <Laserfiche System>
Date Aprv LOPC: 2012 Sep 13 Thursday 17:00 U [5:00 PM PT] <Circa> <On Srce Filename>
LO_Mtng / LO_Mtng_Archive <Laserfiche System>
Date Published : 2011 Sep 15 Thursday 17:00 U [5:00 PM PT] <Circa> <Assume>
Date Posted …. : Unknown / Cannot Determine
Date Annotated : 2019 Apr 12 Friday 13:00 U [1:00 PM PT] <Circa> <Vnn>
Type .....: BID002 = Body Item (BI) Appendix D, Item 2
PPLA = Plan (PL) = Plan, Orientation: Portrait (P), Sheet: Letter (A),
Paper .....: PA = US "A Size" (Letter), (w x h – 8.5 in x 11.0 in)
Size .....: 386 kb, Page(s): 1
File BHCN ...: R_X_WD00002_VG_PLPA_FPBase_2011_06Jun_20Mo_1700U.pdf
Fldr BHCN … C:\... \BH_CPONA\ 050_LOCG\LOPB04LU
\LU_12-0032_Dist_Plan_Spc_Foothills\03AWBPG_Fils_PARS
<Check Post + Vnn fldrs>

03.05 Complete

Appendix D0, Item D0.03



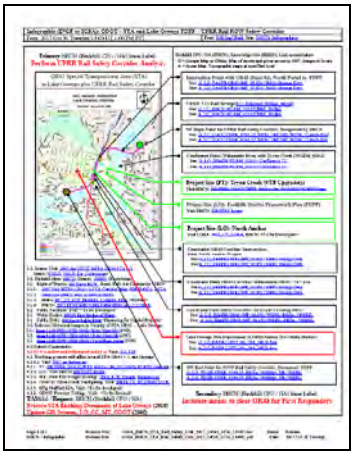
WDWD / LOED Apdx D: Extract Src	BHCN Catalogue for extract

Title .....: **HEC-RAS Model Cross Sections <LO Nbhds FH and BH>**
Sub (Title 2) .: BID003 – PLPA: VGAG: HEC-RAS Model Cross Sections, Scr: 311, DCPA Scr: 005

Link BHCN .: 2011_Jun_VG_PLPA_FPCrSc_W_D0_00_03_BH
S3PgPost: _____
S2Pg: BH_Kn_FDFP_Rept_Acss S1Pg: BH_Kn_LU2012-0032_FDFP
Site: BH_Knw_LO_LU_Projects
Illustrates ….: Flood Plain Analysis 2011 Sep floodplain conditions in FDFP area
Importance: Identifies / Outlines existing floodplains in FDFP due to Willamette Rv and Tryon Cr.
Cross Ref BHCN .: 2012_Sep_BHWL_DCPA_FDFP_P2F2_Apdx_BH <
Link BHCN : 2012_Jul_WDLE_Rept_FDFP_P1F2 , Post LOPL: _____
Src Link BHCN : 2012_Jul_WDLE_Rept_FDFP_P2F2 , Post LOPL: LU_2012-0032, Exhibit F-4
Document Attributes
Author (s)…….: ESA_VGAG = VG = Vigil Agrimis, Portland OR <Prev VGAG to 2013>
ESA = Environmental Science Associates (1969)
Entity ……..: WDWD = WD =Williams Dame and White Developer
LOED = LE = LO Econ Development, Fnct Wrapped in to LORA Circa 2015?
LORA = LR = Lake Oswego Renewal Agency
Date Aprv LOCC: 2012 Jul 24 Tuesday 17:30 U [5:30 PM PT] <Circa> <On Doc Cover>
LO_Mtng / LO_Mtng_Archive <Laserfiche System>
Date Aprv LOPC: 2012 Sep 13 Thursday 17:00 U [5:00 PM PT] <Circa> <On Srce Filename>
LO_Mtng / LO_Mtng_Archive <Laserfiche System>
Date Published : 2011 Jun 20 Monday 17:00 U [5:00 PM PT] <Circa> <HEC Model Run>
Date Posted …. : Unknown / Cannot Determine
Date Annotated : 2019 Apr 12 Friday 13:00 U [1:00 PM PT] <Circa> <Vnn>
Type .....: BID003 = Body Item (BI) Appendix D, Item 3
PPLA = Plan (PL) = Plan, Orientation: Portrait (P), Sheet: Letter (A),
Paper .....: PA = US "A Size" (Letter), (w x h – 8.5 in x 11.0 in)
Size .....: 538 kb, Page(s): 1
File BHCN ...: R_X_WD00003_VG_PLPA_FPCrSc_2011_06Jun_20Mo_1700U.pdf
Fldr BHCN … C:\... \BH_CPONA\ 050_LOCG\LOPB04LU
\LU_12-0032_Dist_Plan_Spc_Foothills\03AWBPG_Fils_PARS
<Check Post + Vnn fldrs>

Cross Ref ID	Document Information – Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

03.06
Complete



Title .....: **ODOT – STA and Lake Oswego**
FDFP / UPRR Rail ROW Safety Corridor

Sub (Title 2) .: none

Link BHCN .: 2017_Oct_BH_IGPA_OR43_STA_LO_UPRR_Corridor

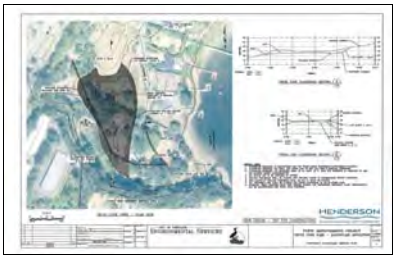
Post S1PgPost: BH_Ingf_Rail, Site: BHCN_Infographics
CREF …..: BH Kn RwRR WDBL Crossings, Site:BH Know ROW Gen: bhpubinvo

Illustrates ….: ODOT Special Transportation Area (STA) and "at grade" rail crossings along OR43 [State St (LO) including WDBL 749179D (Public Storage)
and

Importance: **Constraints for roadway capacity on OR43, TriMet Bus schedule compliance, and access to Foothills per FDFP**
via North Portal OR43_MP_05.83 Pub Storage Dwy
WDBL 749179D (Public Storage)

File BHCN ...: IGPA_BHCN_STA_Rail_Safety_Crdr_2017_11Nov_14Tu_1300U.pdf
Size: 342 kb Page(s): 1
Fldr BHCN ...: C:\..\BH_CPONA\ZZ_Act_2017x04\
\Z2017_11Nov_12Su_1000U_Cret_INFG_ODOT_STA_Rail_Crdr

03.07
Complete



Title .....: **TCWTP Improvement Project (PBES: E10582)**
Tryon Cove Park - Flood Plain Mitigation

Sub (Title 2) .: Plan for cut in Tryon Cove Park for fill on PBES Prop of TCWTP_Extg_CAS

Link BHCN .: 2018_Oct_PBES_PLLB_TCov_Wetlands

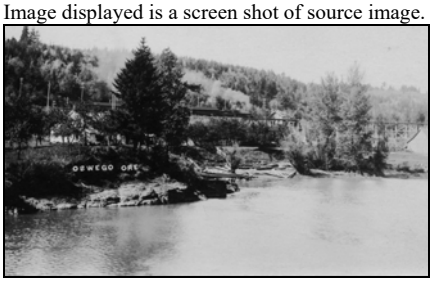
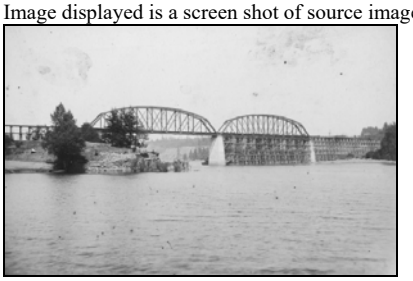
Post S1PgPost: BH_Kn_CM_2017-SN02_TCWTP_MBR ,
Site: BH_Knw_LOCM_Projects

Illustrates ….: Tryon Cove Park (Jarvis Prop 14110 Stampher Rd)

Importance: **12,000 cu yds earth removal "Cut"**
"Cut" on North Bank of Tryon Creek in Tryon Cove Park for "Fill"On South Banks for TCWTP_Extg_CAS tanks East of Pub Storage

File BHCN ...: tccovecut_0001 pdf
PLLBSPBES_TCov_Wetland_60PC_2018_10Oct_08Mo_1000U.pdf
Size: 1, 865 kb Page(s): 1

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

03.08 Research Annote Work Needed	Image displayed is a screen shot of source image. 	Title .....: **WDBL View NE to West Bridge head of UPRR Lake Oswego Rail Road Bridge Construction** Sub (Title 2) .: Approach trestle (3 timbers high) to west bridge pier circa 1907 **Link BHCN .: Imag_LLIB_414b_/_0946_WDBL_/_Berm_Vw_NE** Source LLIB: LO_LLIB_HPHT_Image_Collection_Index Note Link Format Imag, LLIB = Source, nnnn = Photo ID / nnnn = image file name download Post S1PgPost:None, Site: BH_Knw_Birdshill_Hisorical_Images Illustrates ….: West wooden trestle circa 1910 replaced with earth berm and 60 ft steel bridge circa 1925 – 1935. Impedes free flow of surface water to Willamette River from Fielding and Stampher Roads Importance: **No free flow of water implies surface water from Fielding Road and Stampher Road causes flooding problems not recognized or mitigated by any government entity.** **Projects: 2012 FDFP, 2017 USAP Tryon Cr Culvert Replacement** File LLIB ...: 946.jpg File:BHCN: None Established, Researching and annotating.pdf Size: 6, 152 kb Page(s): 1
03.09 Research Annote Work Needed	Image displayed is a screen shot of source image. 	Title .....: **WLRM_020.1 View NW to WDBL and approach trestle to west pier of UPRR Lake Oswego Rail Road Bridge** Sub (Title 2) .: Approach trestle (3 timbers high) to west bridge pier circa 1920 **Link BHCN .: Imag_LLIB_0416_/_0948_WLRM_020.1_/_WDBL_Trestle_Vw_NW** Source LLIB: LO_LLIB_HPHT_Image_Collection_Index Note Link Format Imag, LLIB = Source, nnnn = Photo ID / nnnn = image file name download Post S1PgPost:None, Site: BH_Knw_Birdshill_Hisorical_Images Illustrates ….: West wooden trestle circa 1910 replaced with earth berm and 60 ft steel bridge circa 1925 – 1935. Impedes free flow of surface water to Willamette River from Fielding and Stampher Roads Importance: **No free flow of water implies surface water from Fielding Road and Stampher Road causes flooding problems not recognized or mitigated by any government entity.** **Projects: 2012 FDFP, 2017 USAP Tryon Cr Culvert Replacement** File LLIB ...: 948.jpg File:BHCN: None Established, Researching and annotating.pdf Size: 2,325 kb Page(s): 1
03.10 Research Annote Work Needed	Image displayed is a screen shot of source image. 	Title .....: **WLRM_020.1 View NE to UPRR Lake Oswego Rail Road Bridge at WLRM_020.0** Sub (Title 2) .: River view to NE of bridge circa 1910 **Link BHCN .: Imag_LLIB_1599_/_4120_WLRM_020.1_/_UPRR_LO_RR_Bridge** Source LLIB: LO_LLIB_HPHT_Image_Collection_Index Note Link Format Imag, LLIB = Source, nnnn = Photo ID / nnnn = image file name download Post S1PgPost:None, Site: BH_Knw_Birdshill_Hisorical_Images Illustrates ….: Contrast approach trestle timber height, W pier approach = 3, E pier approach = 5 West wooden trestle circa 1910 replaced with earth berm and 60 ft steel bridge circa 1925 – 1935. Impedes free flow of surface water to Willamette River from Fielding and Stampher Roads Importance: **No free flow of water implies surface water from Fielding Road and Stampher Road causes flooding problems not recognized or mitigated by any government entity.** **Projects: 2012 FDFP, 2017 USAP Tryon Cr Culvert Replacement** File LLIB ...: 4120.jpg File:BHCN: None Established, Researching and annotating.pdf Size: 7,118 kb Page(s): 1

04 Critical WVSOM – BH Comment(s)

Return to first page: 2019 Jun BH TS CE WVSOM EIS

04 Critical WVSOM – BH Comment(s)
04.01 Abstract
04.02 Comments source from BHCN Co-Chair
04.03 Smry of BHCN Recommendations
04.04 Background to BHCN Recommendations
04.05 Locale of BHCN wrt WRB and WVSOM
04.06 BHCN and WVSOM Scoping Meeting
04.07 New Plus Codes Locale Reference System

04.01 Abstract

Return to : Critical WVSOM – BH Comment(s)

As Co-Chair of Birdshill CPO / NA
Visit: BH, BHCN = Birdshill CPO / NA
Cross Ref local: G_CC-LO_BHCN_Birdshill_CPO/NA_Area
Cross Ref local: P_<84QV>_C8JV+34_Centroid_BHCN_GMap

My focus for the USAP project WVSOM EIS is to promote development and ongoing evolution of clear communication for understanding the Willamette River, and Willamette River Basin (WRB) attributes and features that affect our community. Thus the scope of the recommendations is limited to general communicative topics, since I do not have a technical background in water management. **However** as a community leader I must rapidly understand and see to the consistent transfer of knowledge regarding multiple technical and political subjects, along with associated terms, policies, practices and locales to affected community parties in 2019 and forward in time to the end our planning horizon.
That date is 2060 December 31 Friday 17:00 U [5:00 PM PT], termination of the Stafford IGA.
Visit Official: CC_CCPG_PRLS_Sign_Stafford_IGA
Visit Nbhd ..: BH_Knw_BH_IGA_STFD <evolving>
Coalescing documents for endeavors that precipitated this interest in WVSOM EIS project are partially specified in
Coalescing doc(s) – WVSOM

04.02 Comments source from BHCN Co-Chair

Return to : Critical WVSOM – BH Comment(s)

As Co-Chair (2016-2017) of the Birdshill CPO / NA
Visit: BH, BHCN = Birdshill CPO / NA
Visit: BH_Cntr_Bylaws [Bylaws with map(s)]
See : 2012_Sep_BH_PAKT_BH_Stats [BH Statistics(s)]
I, Charles B. Ormsby (aka Skip), as Co-Chair of the Birdshill CPO / NA make these comments for the Willamette Valley System Operation and Maintenance (WVSOM), Environmental Impact Statement (EIS) project,
spanning years 2019 to 2023
Visit Official: USACEPD_WVSOM
Visit Nbhd ..: BH_Kn_CE_19-01_WVSOM
Overseen by US Army Corps of Engineers Portland District
Visit Official: USACEPD, USAP, CE
Visit Nbhd ..: BH_Kn_USACEPD_Projects
These comments are primarily from my own perspective that has evolved since 2000. Thus testimony / comments are my personal opinion at date of WVSOM submission. A BHCN resolution in the near future may endorse and codify them as representing a collective neighborhood opinion.

04.03 Smry of BHCN Recommendations (Rnn)

Return to : Critical WVSOM – BH Comment(s)

For all Birdshill recommendations (R01 – R12):
GPS = Global Positioning System
references to a locale POINT by coordinate(s)
nomenclature for Latitude, Longitude,
Plus Code = Aka Open Location Code
references to a locale AREA by grid system
nomenclature specified in
Visit: Plus_Code_Map_Home
See: Plus_Code_wkpd
Visit <BHCN>: BH_Knowledge_Maps
See developing links to sub page subjects
Source = Accepted authoritative source – maintained and continually coordinated and updated by on-line repositories of definitions, data and and cross references accessible to the public.
WRBPA = Willamette River Basin Planning Atlas
See ..: OSU_PNERC_Book_WRBPA
Visit: OSU_PNERC_Site_WRBPA
WRB / WB = Willamette River Basin

R01 = Compile source of river mile indices for WRB

R02 = Develop source for terms wrt WRB

R03 = Develop source thesaurus of terms for WRB

R04 = Develop source for routine sequences for WRB

R05 = Utilize GPS, Plus Codes and others for locales

R06 = Update the PNERC 2002 WRBPA

R07 = Align PNERC 2002 WRBP Atlas with WVSOM

R08 = Develop maps for WVSOM

R09 = Develop jurisdictional/political maps for WRB

R10 = Confirm WRB limitations with cautions to ALL

R11 = Engage document management consultants

R12 = Make WRB development costs visible

R13 = Coordinate WRB management with FEMA

04.04	Background to BHCN Recommendations

Return to : **Critical WVSOM – BH Comment(s)**

The reason for these personal comments rather than ones endorsed by a neighborhood (nbhd) resolution (RSLT)
Visit: BH_Resolultions
Example: BH_RSLT_2014_Conf_on_RR_ROW
Is there has simply been zero (0) time between the WVSOM EIS project "public scoping meeting" and termination of the public comment period. The public scoping outreach meeting was found by reading a blurb on Portland Tribune website under "What's happening" box on the morning of 2019 Jun 06 Thursday. I thought it was a meeting regarding an extension of Willamette Basin Review (WBR) which was disclosed to Birdshill in a 2017 May meeting with USAP regarding concepts for replacing, possibly daylighting the Tryon Creek Culvert.
Visit Nbhd: BH_Kn_CE_2017-SN02_TCCR
(TCCR = Tryon Creek Culvert Replacement)
See: 2017_Jun_LORV_ATCL_TCCV_Replace\
Cross Ref Previous project(s)
2007 Visit: BH_Issue_Daylight_Tryon Cr,
Site 2013 May BH Dgst 2013.12
2013 ODOT – Recently circa 2018 – 2019 learned

I had been wondering what evolved with USAP WBR project due to many evolving project implications for our community and especially after a six month road closure of Terwilliger Blvd between 2017 Dec and 2018 Jul
Visit: BH_Kn_PBES_Project_TBSP
Birdshill knowledge source of WBR
See: 2017_Dec_PTRB_ATCL_WLRV_SB_WF_DEQ
Note reference to site pollution in Foothills District Martin Electric, possible PCB ground contamination, Oregon DEQ is aware as stated in article.
Visit Official: USACEPD_WBR
Visit Nbhd ..: BH_Kn_CE_17-01_WBR

Careful reading of the WVSOM EIS Brochure
See WVSOM: Scoping_informational_brochure
See Nb: **2019_Jun_USAP_BRPA_WVSOM_EIS_Scpng_BH**

Clarified the distinction after the WVSOM EIS scoping meeting along with other key meeting points received.

As neighborhood / community Co-Chair, activist, primary researcher, and archivist I realized the importance of the WVSOM EIS scoping meeting regarding a relatively high level resource management policy overview of the Willamette River Basin (WRB). Including the aspects of water management notably wrt Birdshill CPO / NA "flood control". A misnomer label as I have: suspected, observed, studied and learned. All confirmed by USAP experts at scoping meeting in contrast with project advocates in the environs of the City of Lake Oswego. With respect to multiple endeavors contemplated for the Foothills District in the past 10 to 20 years.
Visit: BH_Kn_EVCR_LC_Foothills <Primary CRef>
CRef: **BHCN and WVSOM Scoping Meeting**

The WVSOM EIS policy overview / update will have and should have repercussions on historic, current (active) – existing, shelved (dormant) and evolving documents at the detail local / neighborhood levels. Including, but not limited to laws, administrative rules, regulations, policies, and agreements (LARPA) plus plans that affect specific stretches (un-labeled reaches) approximately indexed by river miles (RM). In the specific instance of the Willamette River (WL), Birdshill has chosen to label the river miles by WLRM. Birdshill CPO / NA lands abutting the Willamette River are affected by many water bodies and features upstream of WLRM_020.2. Attributes of water bodies (primarily flooding) and features [dam(s), dikes, contemplate fill actions below Base Flood Elevation (BFE) etc] are being synthesized, distilled, cross referenced (CRef). Then posted with links at the following BH websites and webpage(s) . These online linkage knowledge base sites and pages are in a state of constant and rapid evolution as information is compiled.
Visit: BH_Kn_Bodies_of_Water
Visit: BH_Knowledge_GIS <GIS Info >
Visit: BH_Knowledge_Maps <Map Info >
Visit: BH_Kn_EVCR_LC_Foothills <Primary CRef>

04.05	Locale of BHCN wrt WRB and WVSOM

Return to : Critical WVSOM – BH Comment(s)

The Willamette River segment that forms the east boundary of the BHCN is on the west bank of the Willamette River (WL or WR). River mile (River Mile_wkpd) (RM) indexing marks can be found on the USGS 7.5 minute Lake Oswego (LO) Quadrangle [Quad(s) (Qd)] for edition years 1984 and prior.
See: USGS_HTMC
See: 1984_Jan_USGS_HTMC_MPPD_Quad_LO (Map)
See: 2004_Apr_USGS_RPPA_Map_Symbols_HTMC (Sym)
See: 1994_Jan_USGS_HTMC_MLPE_Index_OR(OR Index)
Since 2011 RM index marks have been removed from USGS Quad Maps. Why is unknown (Need to be reinstated).
See: USGS_National_Map
See: USGS_US_Topo
Cross Ref
R01 = Compile source of river mile indices for WRB

The Willamette River segment wrt to Birdshill CPO / NA begins on the north at Multnomah / Clackamas County Line and southern jog at WLRM_019.4
Cross Ref local: P_<84QV>_C9M2+3F_OR_MC-CC_S_Jog
and ends south and upstream (wrt river flow) at confluence of Tryon Creek at WLRM_020.2.
Cross Ref local: P_<84QV>_C8FV+5H_Confluence_WR_/_TC

Note as Co-Chair of the Birdshill CPO / NA I have concerns with multiple stretches of the Willamette River and entire Willamette River Basin system as is depicted on the following comparative maps (CM) and key defining basin map and infographic (IG).
See: 2015_Dec_LOTP_LOBH_RLWR_020_N_019 [Compare Map [CM)]
(Foothills Park North and downstream to Elk Rock Escarpment)
Video : 2015_Jun_VIDO_PAGU_Foothills Pk_WLRM_020.3, Tot: 3 mins
See: 2015_Dec_USGS_QdLO_RLWR_022_N_019 [Compare Map [CM)]
(Mary's Woods North and downstream to Elk Rock Escarpment)
See: 2015_Dec_USGS_QIOR_RLWR_050_N_000 [Compare Map [CM)]
(Newburg OR North and downstream to Columbia River)

Please note the above comparative maps are being updated. For Willamette River Basin the following defining map (MP) and infographic (IG) are **exceptionally important** for both neighborhood, endeavor, political, and general understanding.
See: **2002_PNERC_WRBA_0103_MPPB_Study_Area** (Map)
See: **2002_PNERC_WRBA_1002_IGPB_USGS_Quads** [Infographic (IG)]

04.06	BHCN and WVSOM Scoping Meeting

Return to : Critical WVSOM – BH Comment(s)

The WVSOM EIS scoping meeting was conducted / hosted by USAP on the afternoon of: 2019 Jun 06 Thursday, 16:00 U [4:00 PM PT] to 18:30 U [6:30 PM PT]. Meeting was held at Portland State University Place Hotel Conference Center
310 SW Lincoln Ave, Portland OR 97201-5007
Locale: PSU Conference Center, 310 SW Lincoln Av, Portland OR
Google (St / Imag): G_PT_PTDT_PSU_Conf_Cntr_310_Lincoln_Av
Acme (Topo) .....: A_PT_PTDT_PSU_Conf_Cntr_310_Lincoln_Av
Plus Code .....: P_<84QV>_G849+RQ_PT_PTDT_PSU_Hotel_Conf
PSU Webpage .....: PSU_Univ_Place_Hotel_Conf_Cntr
Birdshill CPO / NA has created a webpage for the USAP WVSOM EIS project
Visit: BH_Kn_CE_19-01_WVSOM

A meeting report will be posted on this page in near future. Meeting report document creation and posting has been delayed due to personal factors and time required to compile this testimony in order to meet dead line of 2019 Jun 28 Friday 23:00 U [11:30 PM PT].

However in an email to be posted that was distributed to government entities including the WVSOM EIS email address on 2019 Jun 10 Monday 15:11 U [3:11 PM PT] I stated two (2) take aways or key critical items gleaned from the WVSOM EIS scoping presentation and meeting boards from perspective(s) of neighborhood Co-Chair, neighborhood activist, citizen concerned with public finances [ie taxes and fee(s)], finance mechanisms (bond debt instrument with "full faith and credit clauses"
Visit: BH_Kn_CE_WVSOM_Docs_2019
See: **2019_Jun_USAP_PDLL_WVSOM_EIS_Scpng_BH**
Willamette Valley System O&M EIS **Presentation**
See: **2019_Jun_USAP_MBLD_WVSOM_EIS_Scpng_BH**
Willamette Valley System O&M EIS **Meeting Boards**

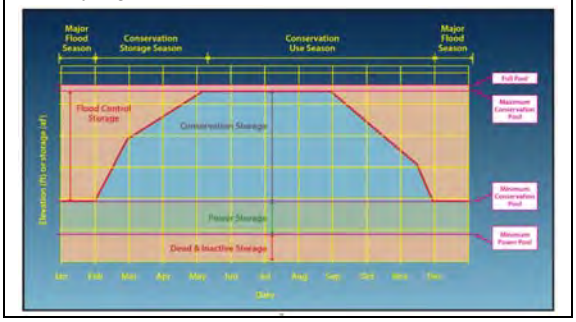
Critical information from
Presentation Slide and Meeting Board Extracts on next page.
Project finance backround
Visit: BH_Know_Public_Debt <pub finance>

Note: USACE = USAP, USACEPD, CE,
US Army Corps of Engineers, Portland District
ONE:
USACE Portland District CANNOT CONTROL Willamette River FLOODING.
USACE can only mitigate flooding effects.
<Barely and depending upon conditions especially 100 - 200 miles downstream of major Willamette River dams>.
TWO
Government entities along Willamette River should not encourage or promote expensive and dense population development below Base Flood Elevations [BFE(s)]
IE in the Flood Plain.

The above statements in the email dated
2019 Jun 10 Monday 15:11 U [3:11 PM PT] were based upon information gleaned from the following two images (extracts) and conversation with USAP technical meeting personnel at the scoping meeting 2019 Jun 06 Thursday 16:30 U.

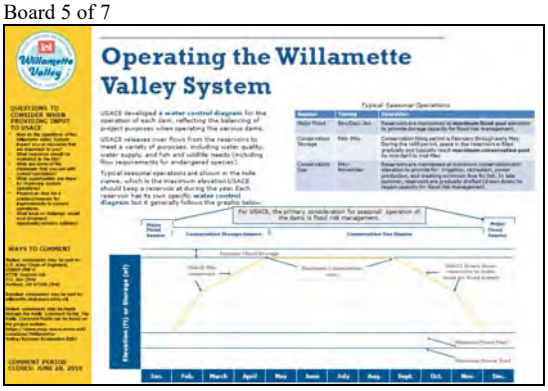
From Presentation Slide 10 of 31;
See: 2019_Jun_USAP_PDLL_WVSOM_EIS_Scpng_BH

Slide 10 of 31



From Meeting Boards, Board 5 of 7;
See: 2019_Jun_USAP_MBLD_WVSOM_EIS_Scpng_BH

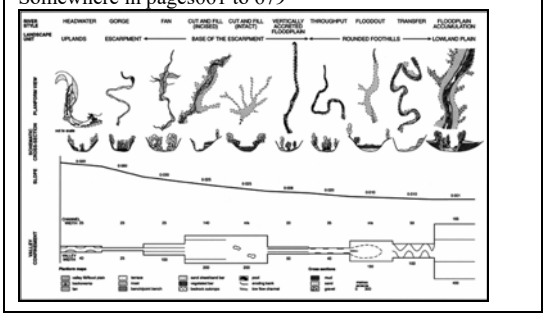
Board 5 of 7



The above extracts combined with the approximate topographic / geographic term for a river style labeled "trough", <implies constrained lateral river space> may be considered equivalent to "Vertically Accreted Floodplain. BHCN started (circa 2018 Jul) to use "trough" to describe lateral cross section of our river segment

Term for river style on a specific segment of river that evolves from source to confluence.
"Vertically Accreted Floodplain" or "Trough" <BHCN>
See: 2000_Jun_Environmental Management

Somewhere in pages661 to 679



The term "trough" allows Birdshill CPO / NA <BHCN> residents in sub areas of both Fielding Road <Briarwood> and Stampher Road <Stampher Road Home Owners Association>
See: 2012_Sep_BH_PAKT_BH_Stats [BH Stats, pg 5/5)]
See: 2009_Apr_BH_BLaw_06.09_BH_Clean
Posted: BH_Cntr_Bylaws [Bylaws with map(s)]
Cross Ref local: P_<84QV>_C8HV+8GW_BHCN_Briarwood
Cross Ref local: P_<84QV>_C8FR+QCW_BHCN_Stampher
to rapidly describe the style and configuration of the Willamette River. Along with flood impacts from weather.

Remember the Birdshill CPO / NA segment of the Willamette River WLRM_023.0 north and downstream to WLRM_019.0 in the vicinity of Birdshill CPO / NA and City of Lake Oswego Foothills District is depicted in the following comparative infographic.
See: 2015_Dec_USGS_QdLO_RLWR_023_N_019 [Compare Map [CM)]
(Mary's Woods North and downstream to Elk Rock Escarpment)
Video : 2015_Jun_VIDO_PAGU_Foothills Pk_WLRM_020.3, Tot: 3 mins
Cross Ref: **Locale of BHCN wrt WRB and WVSOM**
The remainder of infographics in greater and lesser detail are repeated for convenience below.
See: 2015_Dec_LOTP_LOBH_RLWR_020_N_019 [Compare Map [CM)]
(Foothills Park North and downstream to Elk Rock Escarpment)
See: 2015_Dec_USGS_QIOR_RLWR_050_N_000 [Compare Map [CM)]
(Newburg OR North and downstream to Columbia River)

In brief once extreme weather events start upstream of WLRM_020.0 (Willamette River / LO UPRR Bridge) and further into areas of the Tryon Creek Basin and balance of the Willamette River Basin – Birdshill CPO / NA will be impacted because of river style labeled "trough".
Events precipitating extreme flooding in last 60 years:
Water rise due to rapid snow melt:
See: 1964_Dec_Willamette_River_Flood_wkpd
GSCH: Willamette_River_Flood_1964
Water rise due to extreme rain:
See: 1996_Feb_Willamette_River_Flood_wkpd
GSCH: Willamette_River_Flood_1996

This "trough" topography exacerbates expensive development / densification concepts to place fill below the BFE – Base Flood Elevation of the Willamette River ie in the flood plain.

These terms have never in 20 years been linked in City of Lake Oswego documents that promote development in the flood plain along the Willamette River between WLRM_020.0 (Willamette River / UPRR Bridge)
See: P_<84QV>_C8GW+24_OR_OG_UPRR_Br
See: LO-UPRR_RR_Bridge_wkpd , South and upstream to WLRM_021.0 (Willamette River / Oswego Cr).
See: P_<84QV>_C85R+VW_OR_LO_WL_Rv-LO_Cr
See: Oswego_Lake_wkpd

This is why Birdshill CPO / NA needs an accepted and authoritative source for Willamette River Basin terminology. Preferably a source that can be shared amongst citizens, government entities, densifiers/developers and tax payers. Thereby promoting both:
1. Common language using accepted terms with images and
2. Common good with understanding of terms and constraints.
Cross Ref: **R02 = Develop source for terms wrt WRB**

04.07	New Plus Codes Locale Reference System

Return to : **Critical WVSOM – BH Comment(s)**

Note: Plus Code (Map) Information

<[redacted]>

Visit: Plus_Code_Map_Home
Visit: Plus_Code_Map_Portal [BH example at Tryon Cv Pk]
[Plus Code Portal is NOT Google Map(s)]
See: Plus_Code_wkpd (aka Open Location Code)
Think of Plus Codes as Thomas Guide Maps,
discontinued circa 2009 (See: Thomas_Gd_wkpd)
on 5 liter (USC: 1 gallon) / min steroid drip.
Resolution(s) to specify an area rather than a point:
+2 = 14 m^2 = 150 sq ft = (w x h) 10 ft x 15 ft, Large Garage
+3 = 3 m^2 = 32 sq ft = (w x h) 5 ft x 7 ft, SUV foot print
Birdshill CPO / NA has begun to use “plus codes” beginning circa 2019 Jan. Evolving information can be found at following website:
See Nbhd ...: BH_Knowledge_Maps
See developing links to sub page subjects

Cross Ref: **Smry of BHCN Recommendations**
Cross Ref: **R05 = Utilize GPS, Plus Codes and others for locales**

R01 = Compile source of river mile indices for WRB

Return to: **Smry of BHCN Recommendations (Rnn)**

Birdshill CPO / NA exists on the west bank of the Willamette River in a complex environment of jurisdictions, topography, and evolving endeavors from multiple sources.
Cross Ref: **Locale of BHCN wrt WRB and WVSOM**

It is thus imperative based on experience garnered over past 60 years of residency in Birdshill area to have a common accepted and authoritative source of River Mile (RM) (River Mile_wkpd). If residents are to communicate effectively with multiple parties in regards to evolving endeavors and locales wrt Willamette River.

Further map references to river mile markings have not been compiled on USGS "US Topo" maps
See: USGS_National_Map
See: USGS_US_Topo
since their introduction circa 2011.
Cross Ref: **Locale of BHCN wrt WRB and WVSOM**
Cross Ref: **R05 = Utilize GPS, Plus Codes and others for locales**

R02 = Develop source for terms wrt WRB

Return to: **Smry of BHCN Recommendations (Rnn)**

Birdshill residents as stated exist in a complex jurisdictional area with respect to projects and jurisdictions.
Cross Ref: **Locale of BHCN wrt WRB and WVSOM**

Recommendation R02 is closely allied with R01 above.
It may sound redundant but as Co-Chair and researcher I must find resources for river terminology from multiple sources when compiling testimony responses to multiple endeavors promoted by multiple jurisdictions over past fifteen years.

Only to have term challenged by "expert" and government officials that promote and support a specific project, such as redevelopment by City of Lake Oswego by 2012 Foothills District Framework Plan (2012 FDFP). Plus recent "mash up" (combination) promoted by retiring (2019 Jun) City Manager – Scott Lazenby, concept to replace existing Tryon Creek WTP with one of smaller footprint in the same flood plain.
Cross Ref local: P_<84QV>_C89R+WC_OR_LO_Foothills
Visit: BH_Kn_EVCR_LC_Foothills
Visit: BH_Kn_TCWTP_2017

Current proposed site of TCWTP_MBR is in SW corner of FDFP area in flood plain. Existing TCWTP_CAS site on West bank of Willamette River at WLRM_020.2 was flooded by episodes in 1964 and 1966.
Cross Ref: **Locale of BHCN wrt WRB and WVSOM**
Cross Ref local: P_<84QV>_C8CR+GC_OR_LO_TCWTP_CAS
Cross Ref local: P_<84QV>_C8CQ+4H_OR_LO_TCWTP_MBR

Articles wrt extreme flood episodes in 1964 and 1966.
See: 1964_Dec_Willamette_River_Flood_wkpd
GSCH: Willamette_River_Flood_1964
Water rise due to extreme rain:
See: 1996_Feb_Willamette_River_Flood_wkpd
GSCH: Willamette_River_Flood_1996

2012 FDFP project as contemplated with base assumptions (not fully summarized thus disclosed implications to Birdshill CPO / NA in documents) will have high impacts on Birdshill CPO / NA. Notably but not limited to Stampher area (Stampher Road Home Owners Association) downstream of Willamette River / Tryon Creek confluence and FDFP.
Cross Ref local: P_<84QV>_C8FV+5H_Confluence WR_/_TC
Due to base plan requirement and assumption USAP and other authorities will grant permit(s) to place US: 75,000 cubic yards (SI: 57 000 m^3), below the Base Flood Elevation ie in the flood plain.
Cross Ref
Item(s): 3.02, 3.03, 3.04,

R03 = Develop source thesaurus of terms for WRB

Return to: **Smry of BHCN Recommendations**

Once terms are defined and recorded at a source repository, perhaps a website, the terms can be structured thematically akin to a thesaurus.

Such a thesaurus document compiled over the span time of the WVSOM project years <2019 - 2023> will aide citizen comments in preparation for the Final WVSOM EIS and be an ongoing resource for all residents and government entities of the Willamette River Basin in multiple endeavors.

R04 = Develop source for routine sequences for WRB

Return to: Smry of BHCN Recommendations

Birdshill CPO / NA residents when beginning projects on lands adjacent to the Willamette River are confronted with a complex regulatory environment. As Co-Chair and since circa 2015 I have been promoting a concept with the contraction of N-I-C-E, expanding means Notification – Involvement – Compliance – Enforcement.

One of the key Industrial Engineering charts I learned of at class at Portland State University circa 1980 was from the Boeing Aircraft Company where the instructor had worked for many years.

The routine sequence chart is a two dimensional flow chart. Across horizontal page axis are columns labeled "Places of performance (Who / Whom / Where)". Down the vertical page axis are the traditional steps in a process. Taken together with optional columns for comments, I have found through experience it will vivisect most written procedures, and regulations, thereby exposing defects.

This chart will be posted and accessible on the Birdhill CPO / NA webpage BH_Know_DOCS.

BHCN Co-Chair Ormsby encourages its use in the WVSOM to both standardize process for ongoing operation and maintenance but also to convey understanding by a road map of the process to citizens at large.

R05 = Utilize GPS, Plus Codes and others for locales

Return to: Smry of BHCN Recommendations

Places in the Willamette River Basin and thereby domain of the WVSOM need to be located by the public through multiple existing maps and map grid systems. Which then should be cross referenced to multiple policies sourced from multiple jurisdictions in order to effect proper management of water and mitigation of flood impacts within the Willamette River Basin. This "tribal" knowledge gained by either trial and error of neighborhoods or by institutional knowledge gained by professionals needs to be summarized and publicly accessible and further passed down through time.

Birdshill CPO / NA would be appreciative of the USAP and partner agencies in the WVSOM project between 2019 -2023 to cross reference ALL locales by the following means:
Example: Confluence of Tryon Creek / Willamette River
Source 1: Tryon_Cr_wkpd (upper right of article)
Tryon_Cr_GeoHack
Source 2: Google Maps

1.0. Locale indices by river mile RM
possibly river kilometer RK (?) index means
Cross Ref: **R01 = Compile source of river mile indices for WRB**

2.0. Locale area reference by USGS Quadrangle Maps
See: **Link USGS .: 1984_Jan_USGS_HTMC_MPPD_Quad_LO**

3.0. Locale Point reference by GPS nomenclature for latitude and longitude (Lat / Lng) from Google maps

3.1. Format of Lat / Lng in Degree, Minute and Second.
See: 45°25'22.0"N 122°39'24.0"W

3.2. Format of Lat / Lng in Decimal Degrees
See: 45.422778, -122.656667

4.0. Locale Area reference by
Plus Codes / Open Location Code
Cross Ref local: P_<84QV>_C8FV+5H_Confluence_WR_/_TC
Visit: Plus_Code_Map_Home
[Plus Code Portal is NOT Google Map(s)]
See: Plus_Code_wkpd (aka Open Location Code)
Cross Ref: **New Plus Codes Locale Reference System**
Cross Ref: BH_Knowledge_Maps <Links to sub page subjects>

5.0. Property / Taxlot locales by Area.
Property tax maps accessible at:
ORMAP = The Oregon Map
Explanation of nomenclature would be "a good thing".
Examples for Birdshill CPO / NA
See: 2008_Aug_BH_TBLL_Assr_Notation
See: 2006_Aug_BH_TBLP_Assr_Maps_TCA
See: 2004 Oct BH 2102 Tax Assr Maps
Visit: BH_Cntr_Concepts
Cross ref to property tax rates

6.0. Locale Area reference by FEMA map grid
FEMA maps specify the 100 year flood plain and need cross reference throughout WRB and WVSOM.
Visit: FEMA_Flood_Map_Srvc_Center

7.0. Locale Area reference by
Oregon Land Conservation Development Commission
Willamette River Greenway.
See: Willamette_River_Greenway_wkpd

R06 = Update the PNERC 2002 WRBPA

Return to: **Smry of BHCN Recommendations**

This recommendation is a personal one with respect to the USAP WVSOM project and likely one of the more important ones. I found the
PNERC = Pacific Northwest Ecosystem Research Consortium document(s), circa 2015. Contraction(s) <WRBPA / WRBA>
Titled: Willamette River Basin Planning Atlas
Sub Title: Trajectories of Environmental
and Ecological Change
Book …: OSU_PNERC_Book_WRBPA
Website: OSU_PNERC_Site_WRBPA
This atlas with specific map(s) <MPPB> below and an infographic <IGPB> have helped immeasurably explaining the Willamette River basin to myself as I studied the Willamette River in relation to multiple projects. Further I have found it to be an accessible and authoritative source when producing testimony or explaining the context of river features to property owners. The index maps and explanation of the USGS Quadrangle map grid system are the best.
See: **2002_PNERC_WRBA_0103_MPPB_Study_Area**
See: **2002_PNERC_WRBA_1002_IGPB_USGS_Quads**
Posted at: OSU_PNERC_Site_WRBPA
The atlas explains a lot with pictures and maps.
The atlas was compiled circa 2000 – 2002.It needs updating.
The atlas likely covers many subjects that will be explored in the course of the WVSOM EIS between 2019 and 2023.

R07 = Align PNERC 2002 WRBP Atlas with WVSOM

Return to: **Smry of BHCN Recommendations (Rnn)**

As stated above in R06 the WRBPA (Atlas) likely covers many of the topics to considered in the USAP WVSOM EIS between 2019 and 2023.

All efforts possible should be
1. Made to update the planning atlas for WVSOM and see to continuous updates. In order to keep topics current.
2. Align the WRBPA with map(s) and other Willamette River documents to be created by WVSOM EIS as much as possible with cross references – hyperlinks between the documents on an ongoing basis.

R08 = Develop maps for WVSOM

Return to: **Smry of BHCN Recommendations (Rnn)**

This recommendation is essentially to identify and label all reaches of the Willamette River from its confluence with the Columbia River WLRM_000.0, CLRM_0104.1 south and upstream throughout the entire basin and tributaries.

Native Peoples terms for portions or reaches of the Willamette River should be respected.
Maps of these labeled reaches need to be
1. Indexed by river miles, Lat / Lng, Plus Codes etc.
   Cross Ref: **R01 = Compile source of river mile indices for WRB**
   Cross Ref: **R05 = Utilize GPS, Plus Codes and others for locales**
   Cross Ref: **R06 = Update the PNERC 2002 WRBPA**
   Cross Ref: **R07 = Align PNERC 2002 WRBP Atlas with WVSOM**
2. Created and made publicly accessible.
3. Included in documents for the final WVSOM EIS circa 2023

Example reaches already defined by the City of Portland
See: **2006_Jul_PBPS_IGPB_WR_River_Reaches**
Document Attributes
Source: River_Plan_WR_PBPS_Background
Link PBPS: Map of River Plan Study Area
Link BHCN: 2006 Jul IGPB WL River Plan Reachs
Post to : BH_Kn_BW_WR_Ev_Rsrc <Site and Page being revised>

R09 = Develop jurisdictional/political maps for WRB

Return to: **Smry of BHCN Recommendations (Rnn)**

When updating maps and infographics for the USAP WVSOM an effort to produce maps with layers of USGS Quad grid, and neighborhoods, jurisdictional boundaries and others needs to be complied and maintained.

Again Birdshill CPO / NA exists in a complex area
See: 2015_Dec_USGS_QdLO_RLWR_022_N_019 [Compare Map [CM)]
(Mary's Woods North and downstream to Elk Rock Escarpment)

An area reach of the Willamette River which includes multiple jurisdictions, neighborhoods, State of Oregon Legislative districts (Senate and House) and US Congressional Districts. I have learned from experience from producing testimony on any project this requires time to cross connect parties on both banks of the Willamette River from WLRM_019.0 (Milwaukie – Johnson Creek South and upstream past Birdshill CPO / NA at WLRM_020.0 and South and upstream to City of Lake Oswego and West Linn.

R10 = Confirm WRB limitations with cautions to ALL

Return to: **Smry of BHCN Recommendations (Rnn)**

Since 2000 and likely before the City of Lake Oswego has been contemplating redevelopment of its Willamette River frontage on the West bank between
Tryon Creek at WLRM_020.2
See: P_<84QV>_C8FV+5H_Confluence_WR_/_TC
south and upstream to about
Rohr Park at WRLM_020.5.
See: P_<84QV>_C88V+69_WR_/_Rohr_Pk
One primary assumption of this endeavor is placement of 75,000 cubic yards of fill below the Base Flood Elevation (BFE) ie in the floodplain in the Foothills District.
See: P_<84QV>_C89R+WC_OR_LO_Foothills
Consequently I am concerned thus have been on a mission since 2017 to find, annotate and catalogue ALL pertinent documents to annotation cards (document metadata).
CRef: **BHCN and WVSOM Scoping Meeting**

City of Lake Oswego officials, local leaders and Foothills District project advocates have demonstrated with deeds linked to projects since 2005 they consider west bank frontage of the Willamette River their own. It takes a substantial amount of energy to confront this mindset when a project affects residents upstream, downstream or across the river to the east bank.

One project that surfaced in 2005 Jun and involved the USAP was positioning and locale of a substantial boat basin and dock on the Willamette River adjacent to the future Foothills District. Information can be seen at the Birdshill site:
Visit: BH_Kn_CE_05-01_FTHL_Dock
See: 2005_Jun_LORV_ATCL_FHBD_Dock_Sitting_BH
See: 2005_Jul_OREG_ATCL_FHBD_Dock_Hearing_BH
See: 2009_Aug_LORV_ATCL_FHBD_Lawsuit_BH

A second recent project of a Fireworks Display that evolved in 2017 and was executed on 2018 July 04 Wednesday. Presented problems for Birdshill. (I was concerned with brush fires potentially set off by falling debris and escape routes at night plus the replacement cost of infrastructure with an estimated value of $500,000,000 (guess for 1 bridge, 2 sewer plants along with expensive homes). Testimony was given in 2017 November but was not heeded. The fireworks display failed. Fortunately without catastrophe. Because audiences in Lake Oswego parks could not see the firework burst patterns for the tall Douglas Fir trees along the river that blocked the view. Government officials and contractors did not do the math. I did circa 2018 May. But could not develop and transmit infographics to LO City Council that were simple and respected in time for their consideration. Diagrams explaining application of trigonometric functions and fireworks shell burst parameters. All should be disclosed.
Visit: BH_Kn_CM_2017-SN01_LOFW
See: 2017_Jul_LORV_ATCL_2018_LO_Fireworks_BH
See: 2018_Jul_LORV_ATCL_2018_LOFW_Bust

As I learned dealing with rocketry at Boeing Rocketdyne.
See: Boeing_Rocketdyne(1996-2005)_wkpd
Assumptions are dangerous.
Visit: **LU 12-0032** <LO 2012 FDFP site>
The point of this reminiscing is City of Lake Oswego (LO) <<Note web page of gov entities planning for BHCN
Visit: BH_Knw_Gv_Org_Charts >>
and likely other government entities do not synthesize, distill and distribute information about project impacts on the banks of the Willamette River. Especially LO and 2012 FDFP
Visit: **LU 12-0032** <LO 2012 FDFP site>
Visit: BH_Kn_LU2012-0032_FDFP <LO 2012 FDFP site>
Cross Ref: BH_Kn_EVCR_LC_Foothills
Project has key assumption not disclosed to BHCN of placing 75,000 cubic yards of fill in the Foothills District.
See: **2011_Sep_VG_ApBd_FldPln_W_D0_00_02_BH**
Pg 2, Header: Findings, Bullet 1
Cross Ref: [redacted], Item(3): 3.01 – 3.06
Cross Ref Location: P_<84QV>_C89R+WC_OR_LO_Foothills

Which is in the flood plain of the Willamette River on the west bank from
Tryon Creek at WLRM_020.2
See: P_<84QV>_C8FV+5H_Confluence_WR_/_TC
South and upstream to about
Rohr Park at WRLM_020.5.
See: P_<84QV>_C88V+69_WR_/_Rohr_Pk
Cross Ref: [redacted]
Items 03.01 – 03.06

Government jurisdictions along with developers/densifiers project advocates need to be mandated and thereby required to understand the limitations of Willamette River Basin (WRB) system of water management by the US Army Corps of Engineers, Portland District for the length and breadth of the entire Willamette River Basin (WRB) . Including charts and documents presented at the USAP WVSOM EIS scoping meeting held on 2019 Jun 06 Thursday
CRef: **BHCN and WVSOM Scoping Meeting**

Especially for endeavors requiring expensive structures that would be impacted by 100 year flood events. Remember the following:
Articles wrt extreme flood episodes in 1964 and 1966.
See: 1964_Dec_Willamette_River_Flood_wkpd
GSCH: Willamette_River_Flood_1964
Water rise due to extreme rain:
See: 1996_Feb_Willamette_River_Flood_wkpd
GSCH: Willamette_River_Flood_1996

Then institutionally provide public evidence and confirmation of understanding of Willamette River Basin (WRB) water management by means of entity resolutions that are publicly distributed and recorded in repositories plus accessibly archived. Then periodically reviewed. Prior to evaluation of any project permits to be granted by the authority of the:
USACE_NWD_PD (USAP) (CE)
US Army Corps of Engineers, Portland District.

R11 = Engage document management consultants

Return to: **Smry of BHCN Recommendations (Rnn)**

Documents have changed radically since the production of the last Willamette Valley System and Operation EIS that was conducted circa 1980.
See: 2019_Jun_USAP_PDLL_WVSOM_EIS_Scpng_BH, Slide 21 of 31.

Over the past fifteen years Birdshill CPO / NA has experienced multiple multi-million dollar projects that require an Environmental Impact Statement (EIS).
Visit: BH_Kn_EVCR_LC_Foothills
Thus I as Co-Chair have formed many opinions about the document work products from the neighborhood perspective.

:

1. Specialists in document management.
2. Specialists in PDF document creation, archiving and administration.
   See: 2018_Aug_BH_IGPA_PDF_Oprt_n_Actn
3. Specialists in document archival and retrieval.
4. Specialists in compiling dictionaries of terms.
5. Specialists in compiling visual dictionaries.
   Example(s): From Birdshill desk top reference(s)
   Book: Ultimate_Visual_Dictionary_DK_amazon
   Book: Macmillan_Visual_Dictionary_amazon
6. Specialists in compiling thesaurus of terms.
   By this is implied an "expert" who has and has demonstrated knowledge of the study of hierarchies and systems of classification.
   Example(s): From Birdshill desk top reference(s)
   Book: The_Order_of_Things_amazon
7. Specialists in iconography / symbols
   Distil WRB features to icons / symbols.
   If icon in color make table of black/white equivalences.
   Most citizens cannot afford color injet printers.
8. Specialist in developing infographics, fact sheets, and document summaries.

The aim is to make a cohesive set of documents regarding the USAP WVSOM EIS that can be accessed and continuously updated and accessible from many device platforms. Smart phones, tablets, portable computers, and desktops.

As Co-Chair I would also really like to see documents:
1. Indexed by key words, phrases and contractions within the document when length over 10 to 20 pages
2. Catalogued on "cards", smart phone with Android Operating System for an article depict an image of the document and meta data about the article / document.
   Example: Title and web page where the document is posted. (See items through out this document).
3. Infographics on single subjects like ones available for a college course in Trigonometry or Geography.
   Examples available at:
   Visit: Permacharts_Inc

R12 = Make WRB development costs visible

Return to: **Smry of BHCN Recommendations (Rnn)**

Development impacts within flood plains of the Willamette River Basin need to be systematically exposed.

Some how government entities, and developers need to publicly state by production of cost / risk / benefit analysis the impacts of their project on water management throughout the basin.
CRef: **BHCN and WVSOM Scoping Meeting**

Before catastrophic events take place with unrecoverable cost incurred on lives along with damage to nearly irreplaceable infrastructure affecting the public tax and fee base.

R13 = Coordinate WRB management with FEMA

Return to: **Smry of BHCN Recommendations (Rnn)**

The WVSOM EIS work products needs to be coordinated and aligned with FEMA. Especially its flood maps with local variants along the entire length and breadth of the Willamette River Basin.

How to accomplish this I have only minimal conceptual ideas at this date.

05 USAP WVSOM EIS Scoping Docs

Return to first page: **2019 Jun BH TS CE WVSOM EIS**

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

05.01 Complete

Source Webpage on WVSOM

Title .....: **Willamette Valley System Operations and Maintenance Environmental Impact Statement <BH: WVSOM EIS>**
Sub (Title 2) .: Public Scoping Meeting Presentation <Portland Venu, 2019 Jun 06 Thu 16:30 U>
Link USAP: Public_scoping_meeting_presentation
File USAP : p16021coll7_11557.pdf
Link BHCN : 2019_Jun_USAP_PDLL_WVSOM_EIS_Scpng_BH
S2PgPost: BH_Kn_CE_19-01_WVSOM
S1Pg: _____ Site: BH_Kn_USACEPD_Projects
Illustrates ….: Willamette River Basin, Willamette Valley System O&M EIS <2019-2023>
Importance: Flood mitigation limitations wrt 2012 FDFP vs. Stampher Road HOA/BHCN
Cross Ref BHCN .:None at this date – to be created <
Link BHCN : BH_Kn_EVCR_LC_Foothills and, LOPL: _____
Document Attributes
Author (s)…….: USACE_NWD_PD (USAP) (CE) <US Army Corps Engr, Portland District>
Entity ……..: USACE_wkpd <US Army Corps of Engineers>
Projce WVSOM <Short> = Willamette Valley System O&M EIS
Date Published : 2019 Jun 03 Monday 19:00 U [7:00 PM PT]
Date Posted …. : 2019 Jun 06 Thursday 16:30 U [4:30 PM PT] <USAP Meeting >
Date Annotated : 2019 Jun 21 Friday 23:00 U [11:00 PM PT] <Circa> <V01>
PDLL = Present Display (PD), Orientation: Landscpape (L), Sht: Legal (L),
Paper .....: LL = US "L Size" (Legal), (w x h – 13.0 in x 7.0 in)
Size .....: 7,116 kb, Page(s): 31
File BHCN ...: PDLL_USAP_WVSOM_EIS_Scp_Prsn_2019_06Jun_06Th_1630U.pdf
Fldr BHCN … C:\... \BH_CPONA\
\ZZ_Act_2019x02\Z2019_06Jun_06Th_1600U_Mtng_USAP_WVSOM

05.02 Complete

Source Webpage on WVSOM

Title .....: **Willamette Valley System Operations and Maintenance Environmental Impact Statement <BH: WVSOM EIS>**
Sub (Title 2) .: Public Scoping Meeting Boards <Portland Venu, 2019 Jun 06 Thu 16:30 U>
Link USAP: Public_scoping_meeting_boards
File USAP : p16021coll7_11456.pdf
Link BHCN : 2019_Jun_USAP_MBLD_WVSOM_EIS_Scpng_BH
S2PgPost: BH_Kn_CE_19-01_WVSOM
S1Pg: _____ Site: BH_Kn_USACEPD_Projects
Illustrates ….: Willamette River Basin, Willamette Valley System O&M EIS <2019-2023>
Importance: Flood mitigation limitations wrt 2012 FDFP vs. Stampher Road HOA/BHCN
Cross Ref BHCN .:None at this date – to be created <
Link BHCN : BH_Kn_EVCR_LC_Foothills and, LOPL: _____
Document Attributes
Author (s)…….: USACE_NWD_PD (USAP) (CE) <US Army Corps Engr, Portland District>
Entity ……..: USACE_wkpd <US Army Corps of Engineers>
Projce WVSOM <Short> = Willamette Valley System O&M EIS
Date Published : 2019 Jun 03 Monday 19:00 U [7:00 PM PT]
Date Posted …. : 2019 Jun 06 Thursday 16:30 U [4:30 PM PT] <USAP Meeting >
Date Annotated : 2019 Jun 21 Friday 23:00 U [11:00 PM PT] <Circa> <V01>
MBLD = Meeting Boards (MB), Orientation: Landscpape (L), Sht: (D),
Paper .....: LD = US "D Size" (Letter), (w x h – 22.0 in x 15.0 in)
Size .....: 1,653 kb, Page(s): 7
File BHCN ...: MBLD_USAP_WVSOM_EIS_Scp_Brds_2019_06Jun_06Th_1630U.pdf
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\ZZ_Act_2019x02\Z2019_06Jun_06Th_1600U_Mtng_USAP_WVSOM

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

05.03 Complete

Source Webpage on WVSOM

Title .....: **Willamette Valley System O&M EIS**
Public Scoping Informational Handout
Sub (Title 2) .: Scoping Informational Brochure <for WVSOM project 2019 - 2023>
Link USAP: Scoping_informational_brochure
File USAP : p16021coll7_11455.pdf
Link BHCN : 2019_Jun_USAP_BRPA_WVSOM_EIS_Scpng_BH
S2PgPost: BH_Kn_CE_19-01_WVSOM
S1Pg: _____ Site: BH_Kn_USACEPD_Projects
Illustrates ….: Willamette River Basin, Willamette Valley System O&M EIS <2019-2023>
Importance: Flood mitigation limitations wrt 2012 FDFP vs. Stampher Road HOA/BHCN
Cross Ref BHCN .:None at this date – to be created <
Link BHCN : BH_Kn_EVCR_LC_Foothills and, LOPL: _____
Document Attributes
Author (s)…….: USACE_NWD_PD (USAP) (CE) <US Army Corps Engr, Portland District>
Entity ……..: USACE_wkpd <US Army Corps of Engineers>
Projce WVSOM <Short> = Willamette Valley System O&M EIS
Date Published : 2019 Jun 03 Monday 18:00 U [6:00 PM PT]
Date Posted …. : 2019 Jun 06 Thursday 16:30 U [4:30 PM PT] <USAP Meeting >
Date Annotated : 2019 Jun 21 Friday 23:00 U [11:00 PM PT] <Circa> <V01>
BRPA = Brochure (BR) = Plan, Orientation: Portrait (P), Sheet: Letter (A),
Paper .....: PA = US "A Size" (Letter), (w x h – 8.5 in x 11.0 in)
Size .....: 3,257 kb, Page(s): 18
File BHCN ...: BRPA_USAP_WVSOM_EIS_Scope_2019_06Jun_03Mo_1800U.pdf
Fldr BHCN … C:\... \BH_CPONA\
\ZZ_Act_2019x02\Z2019_06Jun_06Th_1600U_Mtng_USAP_WVSOM

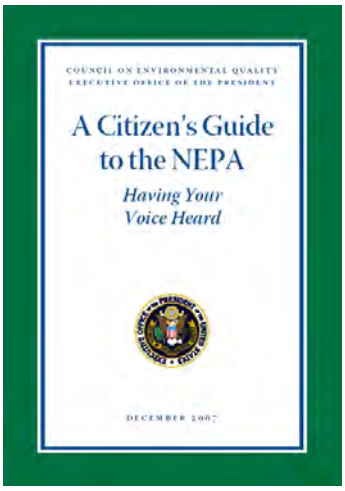
06 USAP WVSOM Website Docs

Return to first page: **2019 Jun BH TS CE WVSOM EIS**

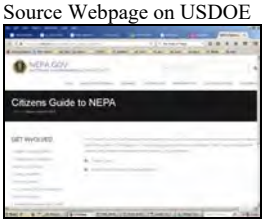
Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

06.01 Complete

NEPA Ciitzen's Guide



Source Webpage on USDOE



NOT CREATED OR ANOTATED 2019 Jun 28 Friday 10:00 U

Title .....: **A Citizen's Guide to the NEPA**

Sub (Title 2) .: Having your voice hear
<Compiling testimony / comments on a public project / study>

Link WVSOM .: Citizen's_Guide_to_NEPA

File USDOE ...: Citizens_Guide_Dec07.pdf

Link BHCN .: 2007_Dec_UDOE_Guide_NEPA_Citzen_Cmnt

WVSOM Post: WVSOM <Left Nav Menu>
USDOE Pg: **USDOE_NEPA_Post_Page**

Link BHCN .: 2007_Dec_UDOE_Guide_NEPA_Citzen_Cmnt_BH

S3PgPost: _____
S2Pg: BH_Kn_FDFP_Rept_Acss S1Pg: BH_Kn_LU2012-0032_FDFP
Site: BH_Knw_LO_LU_Projects

Illustrates ….: Flood Plain Analysis 2011 Sep floodplain conditions in FDFP area
Importance: Identifies / Outlines existing floodplains in FDFP due to Willamette Rv and Tryon Cr.
Cross Ref BHCN .: 2012_Sep_BHWL_DCPA_FDFP_P2F2_Apdx_BH <
Link BHCN : 2012_Jul_WDLE_Rept_FDFP_P1F2 , Post LOPL:
Src Link BHCN : 2012_Jul_WDLE_Rept_FDFP_P2F2 , Post LOPL: LU_2012-0032, Exhibit F-4

Document Attributes
Author (s).....: ESA_VGAG = VG = Vigil Agrimis, Portland OR <Prev VGAG to 2013>
ESA = Environmental Science Associates (1969)
Entity ……..: WDWD = WD =Williams Dame and White Developer
LOED = LE = LO Econ Development, Fnct Wrapped in to LORA Circa 2015?
LORA = LR = Lake Oswego Renewal Agency
Date Aprv LOCC: 2012 Jul 24 Tuesday 17:30 U [5:30 PM PT] <Circa> <On Doc Cover>
LO_Mtng / LO_Mtng_Archive <Laserfiche System>
Date Aprv LOPC: 2012 Sep 13 Thursday 17:00 U [5:00 PM PT] <Circa> <On Srce Filename>
LO_Mtng / LO_Mtng_Archive <Laserfiche System>
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Date Posted …. : Unknown / Cannot Determine
Date Annotated : 2019 Jun 28 Friday 13:00 U [1:00 PM PT] <Circa> <Vnn - PARTIAL>
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Paper .....: PA = US "A Size" (Letter), (w x h – 8.5 in x 11.0 in)
Size .....: 951 kb, Page(s): 1
File BHCN ...: Not determined 2019 Jun 28 Fri 10:00 U.pdf
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\Z2019_06Jun_28Fr_1700U_TSTM_USAP_WVSOM\Source_TS_WVSOM

07 FDFP Apndx D Floodplain Analysis

Return to first page: **2019 Jun BH TS CE WVSOM EIS**

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

07.01 Complete

Appendix D0, Item D0.00 – Apdx Body

VIGIL ✕ AGRIMIS

TECHNICAL MEMORANDUM

WDWD / LOED
Apdx D: Extract Src

BHCN
Catalogue for extract

Title .....: **Foothills District Framework Plan Floodplain Analysis**
Sub (Title 2) .: BdD000 – VIGIL-AGRIMIS: Floodplain Analysis,
Scr: 136, DCPA Scr: 012

Link BHCN .: 2011_Sep_VG_ApBd_FldPln_W_D0_00_02_BH
S3PgPost: _____
S2Pg: BH_Kn_FDFP_Rept_Acss S1Pg: BH_Kn_LU2012-0032_FDFP
Site: BH_Knw_LO_LU_Projects
Illustrates ….: Flood Plain Analysis 2011 Sep floodplain conditions in FDFP area
Importance: Identifies / Outlines existing floodplains in FDFP due to Willamette Rv and Tryon Cr.
Cross Ref BHCN .: 2012_Sep_BHWL_DCPA_FDFP_P2F2_Apdx_BH <
Link BHCN : 2012_Jul_WDLE_Rept_FDFP_P1F2 , Post LOPL: _____
Src Link BHCN : 2012_Jul_WDLE_Rept_FDFP_P2F2 , Post LOPL: LU_2012-0032, Exhibit F-4
Document Attributes
Author (s)…….: ESA_VGAG = VG = Vigil Agrimis, Portland OR <Prev VGAG to 2013>
ESA = Environmental Science Associates (1969)
Entity ……..: WDWD = WD =Williams Dame and White Developer
LOED = LE = LO Econ Development, Fnct Wrapped in to LORA Circa 2015?
LORA = LR = Lake Oswego Renewal Agency
Date Aprv LOCC: 2012 Jul 24 Tuesday 17:30 U [5:30 PM PT] <Circa> <On Doc Cover>
LO_Mtng / LO_Mtng_Archive <Laserfiche System>
Date Aprv LOPC: 2012 Sep 13 Thursday 17:00 U [5:00 PM PT] <Circa> <On Srce Filename>
LO_Mtng / LO_Mtng_Archive <Laserfiche System>
Date Published : 2011 Sep 15 Thursday 17:00 U [5:00 PM PT] <Circa> <Assume>
Date Posted …. : Unknown / Cannot Determine
Date Annotated : 2019 Apr 12 Friday 13:00 U [1:00 PM PT] <Circa> <Vnn>
Type .....: BID000 = Body (BI) Appendix D, Item 0
RPPA = Rept (RP) = Report, Orientation: Portrait (P), Sheet: Letter (A),
Paper .....: PA = US "A Size" (Letter), (w x h – 8.5 in x 11.0 in)
Size .....: 1,326 kb, Page(s): 12
File BHCN ...: R_X_WD00002_VG_ApBd_FldPln_2011_09Sep_15Th_1700U.pdf
Fldr BHCN … C:\... \BH_CPONA\ 050_LOCG\LOPB04LU
\LU_12-0032_Dist_Plan_Spc_Foothills\03AWBPG_Fils_PARS
<Check Post + Vnn fldrs>

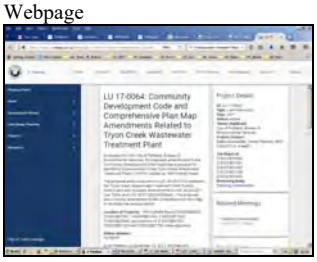
08	Docs/Sites wrt FDFP and TCWTP

Return to first page: 2019 Jun BH TS CE WVSOM EIS

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage

08.01 Background	Webpage 	Webpage.....: **LU 12-0032:** **Foothills - Amendments to** **Create New Special District Plan for Foothills Area**

08.02 Background	Webpage 	Webpage.....: **PP_16-0007:** **Tryon Creek Wastewater Treatment Plant Overlay**

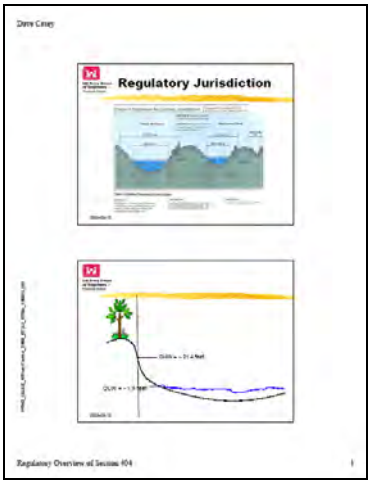
08.03 Background	Webpage 	Webpage.....: **LU_17-0064:** **Community Development Code and Comprehensive Plan Map Amendments Related to Tryon Creek Wastewater Treatment Plant**

09 Docs/Sites wrt Fed Floodplain Authority

Return to first page: **2019 Jun BH TS CE WVSOM EIS**

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

10.01



Title .....: Regulatory Jurisdiction <of USACE / NWD / CEPD >

Link BHCN .: 2005_Jul_CEPD_PPH2_X_Jrsd_USACE_BH

SbPg: BH_CEPD_FHBD_2005_Docs , Page: BH_Kn_CE_2005-SN01_FTHL_Dock
Site: BH_Kn_USACEPD_Projects

Illustrates ….: Jurisdictional authority limits of federal agencies wrt water bodies, wrt BHCN and illustrates OHW=Ordn Highwater, and OLW = Ordn Low Water marks

Importance: Support / Access

Document Attributes

Entity ……..: CEPD = BH Contraction for US Army Corps of Engineers < USACE > Portland District within USACE_NWD
Date Published : 2005 Jul 07 Monday 18:00 U (6:00 PM PT)
Date Annotated : 2018 Jun 12 Tue 16:00 U (4:00 PM PT) <circa>
Type .....: PPH2 = Power Point Handout 2 slides per page
Orientation: Portrait (P), Sheet: Letter (A)
Paper .....: PA = US "A Size" (Letter), (w x h – 8.5 in x 11.0 in)
Size .....: 94 kb, Page(s): 1
File Source …..: USACE / NWD / CEPD – Portland District (CEPD)
File BHCN … PPH2_USAE_XRiverTerms_2005_07Jul_07Mo_1800U.pdf
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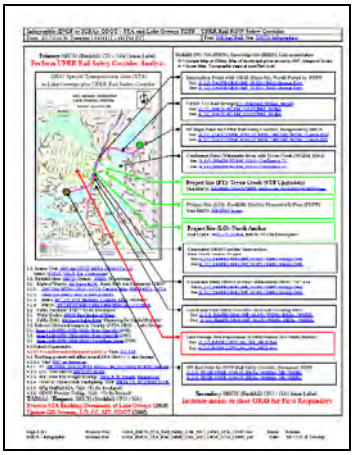
Note Extract froms: PPLA_USAE_PD_LO_LFHP_Dock_2005_07Jul_07Mo_1800U.pdf
Regulatory Jurisdiction [Slide(s) above page(s) 5/9 and 6/9]

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

09.05 Background	Webpage 	Webpage.....: **FEMA_Home** Federal Emergency Management Agency Cross Ref: **FEMA_wkpd** Google Search FEMA + FIRM Where: FEMA = Federal Emergency Management Area FIRM = Flood Insurance Rate Map
09.05.01 Background	Webpage 	Webpage.....: **FEMA_Flood_Map_Srvc_Center** Federal Emergency Management Agency Flood Map Service Center Google Search FEMA + FIRM Where: FEMA = Federal Emergency Management Area FIRM = Flood Insurance Rate Map
09.05.02 Background	Webpage 	Webpage.....: **FEMA_Flood_Map_Srvc_Center** Federal Emergency Management Agency Flood Map Service Center Input 14110 Stampher Rd, Lake Oswego OR Location of Tryon Cove Park, Alder Creek Kayak Rentals former Jarvis property (five taxlots)

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

09.03



Title .....: **ODOT – STA and Lake Oswego**
FDFP / UPRR Rail ROW Safety Corridor

Sub (Title 2) .: none

Link BHCN .: 2017_Oct_BH_IGPA_OR43_STA_LO_UPRR_Corridor

Post S1PgPost: BH_Ingf_Rail, Site: BHCN_Infographics

CREF …..: BH Kn RwRR WDBL Crossings, Site:BH Know ROW Gen: bhpubinvo

Illustrates ….: ODOT Special Transportation Area (STA) and "at grade" rail crossings along OR43 [State St (LO] including WDBL 749179D (Public Storage) and

Importance: **Constraints for roadway capacity on OR43, TriMet Bus schedule compliance, and access to Foothills per FDFP via North Portal OR43_MP_05.83 Pub Storage Dwy** WDBL 749179D (Public Storage)

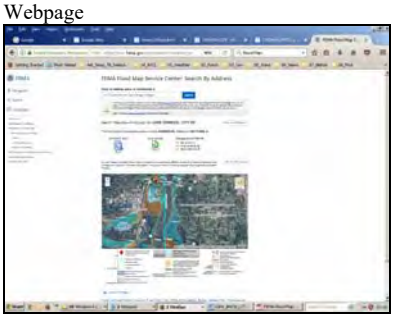
File BHCN ...: IGPA_BHCN_STA_Rail_Safety_Crdr_2017_11Nov_14Tu_1300U.pdf
Size: 342 kb Page(s): 1

Fldr BHCN ...: C:\..\BH_CPONA\ZZ_Act_2017x04\
\Z2017_11Nov_12Su_1000U_Cret_INFG_ODOT_STA_Rail_Crdr

10 Docs/Sites wrt Locale Floodplain Authority

Return to first page: **2019 Jun BH TS CE WVSOM EIS**

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

10.01 Background	Webpage 	Webpage.....: **FEMA_Flood_Map_Srvc_Center** Federal Emergency Management Agency Flood Map Service Center Google Search FEMA + FIRM Where: FEMA = Federal Emergency Management Area FIRM = Flood Insurance Rate Map
10.02 Background	Webpage 	Webpage.....: **FEMA_Flood_Map_Srvc_Center** Federal Emergency Management Agency Flood Map Service Center Alder Creek Kayak Rentals former Jarvis property (five taxlots)
10.03 Background	Webpage 	Webpage.....: **LOC_Lake_Oswego_Municipal_Code** Use left navigtion section to navigate to specific chapers/article LOC LOC_01-60 = Chapters LOC_50 = Community Development Code LOC_50.nn Articles wrt Community Development Code nn-nn: 01-11 LOC_50.05 Articles regarding Design Districts nnn-nnn: 001-011 LOC_50.05.11 Flood Management Area
10.04 Background	Webpage 	Webpage.....: **LOC_50.05.011_Flood_Mgmt_Area** LOC_50.05.11 Flood_Management_Area Key Figures: Figure 50.05.011-C: Flood Management Area Map C <LO and Willamette River, Area(s)> Figure 50.05.011-D: Flood Management Area Map D <LO and Willamette River, Elevations>

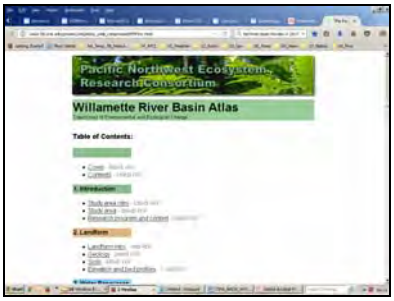
Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

10.05		Title .....: **2012 FDFP with North Portal effect on LO UGMA Plus TCWP 30 Year Facility Plan** Sub (Title 2) .: none **Link BHCN .:** 2012 FDFP with North Portal effect on LO UGMA Post S1PgPost: BH_RSLT_2014x21x10x09 , Site: BH_RSLT_2014 CREF …..: BH Kn RwRR WDBL Crossings, Site:BH Know ROW Gen: bhpubinvo Illustrates ….: Potential impact of at grade crossing at OR43 05.83 Public Storage Dwy WDBL 749179D on LOUGMA GMAP G_LO_FAnFH-OR43 (MP_05.83) / Public Storage Dwy (Street + Images) ACME: A_LO_FAnFH-OR43 (MP_05.83) / Public Storage Dwy (Topo) Importance: **1UPRR and PWRR plus ODOT RD have likely not authorized or been informed / communicated with LO about contemplated at grade crossing east of Kaady Car Wash** File BHCN ...: PPEP_BHCN_FDFP_LOUGMA_2015_03Mar_06Fr_1400U.pdf Size: 872 kb Page(s): 1

11	Sites / Docs wrt OSU PNERC WRBPA

Return to first page: **2019 Jun BH TS CE WVSOM EIS**

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage

11.01		Page Title …: Oregon State University Press Item Title: Willamette River Basin Planning Atlas Item Sub Title: Trajectories of Environmental and Ecological Change Label BHCH: Visit: OSU_PNERC_Book_WRBPA URL: http://osupress.oregonstate.edu/book/willamette-river-basin-planning-atlas Cross Ref.: OSU_PNERC_Site_WRBPA
11.02		Page Title …:Pacific Northwest Ecosystem Research Consortium Item Title: Willamette River Basin Planning Atlas Item Sub Title: Trajectories of Environmental and Ecological Change Label BHCH: ORGE / ODGAMI Visit: OSU_PNERC_Site_WRBPA URL: http://www.fsl.orst.edu/pnwerc/wrb/Atlas_web_compressed/PDFtoc.html Cross Ref.: OSU_PNERC_Book_WRBPA

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

11.03 Research Annote Work Needed

Study Area Pg 1/2

Study Area Pg 2/2

Source Webpage on WRBPA

Title .....: **Study Area – WRBPA**
Sub (Title 2) .: Willamette River Basin Planning Atlas Study area with visual explanation of WRB context

Link WRBPA: Study Area Section 01 - Introduction, Item 03

Link WRBPA: 2002_PNERC_WRBA_0103_MPPB_Study_Area

File USAP : 1b.studyarea_web.pdf

Link BHCN : 2002_PNERC_WRBA_0103_MPPB_Study_Area_BH

S2PgPost: <
S1Pg: BH_Kn_BW_WR_Ev_Rsrc <
Site: BH_Kn_Bodies_of_Water

Illustrates ….: Willamette River Basin Planning Atlas
Importance: Willamette River terminology impact of 2012 FDFP vs. Stampher Road HOA/BHCN
Cross Ref BHCN .:None at this date – to be created <
Link BHCN : OSU_PNERC_Book_WRBPA
Link BHCN : BH_Kn_EVCR_LC_Foothills and, LOPL: LU_2012-0032

Document Attributes
Author (s)…….: S. Payne J. Baker
Entity ……..: OSU_Forest_Sci_Labs Oregon State University Forest Science Labs
Project WRBPA <Short> = Willamette River Basin Planning Atlas
Date Published : 2002 Apr 23 Tuesday 18:00 U [6:00 PM PT] <Doc Meta Data>
Date Posted …. : Unkown
Date Annotated : 2019 Jun 28 Friday 17:00 U [5:00 PM PT] <Circa> <V01> <
MPPB = Map (MP), Orientation: Portrait (P), Sheet: Tabloid (B),
Paper .....: PA = US "B Size" (Tabloid), (w x h – 11.00 in x 17.0 in)
Size .....: 253 kb, Page(s): 2
File BHCN ...: MPPB_PNERC_WR_Basin_2002_04Apr_23Tu_1800U.pdf
Fldr BHCN … C:\... \BH_CPONA\Maps_Actv\080_WLRM_Atlas

11.03 Research Annote Work Needed

US Topographic Maps 1/2

US Topographic Maps 2/2

Source Webpage on WRBPA

Title .....: **USGS Topographic Maps – WRBPA**
Sub (Title 2) .: Willamette River Basin Planning Atlas APPENDICES: Map 34. USGS 7.5-minute Topographic Quadrangle Maps

Link WRBPA: USGS Topographical Maps, Section 10 - Appendix, Item 02

Link WRBPA: 2002_PNERC_WRBA_1002_IGPB_USGS_Quads

File USAP : b.USGStopo_web.pdf

Link BHCN : 2002_PNERC_WRBA_0103_MPPB_Study_Area_BH

S2PgPost: <
S1Pg: BH_Kn_BW_WR_Ev_Rsrc <
Site: BH_Kn_Bodies_of_Water

Illustrates ….: Willamette River Basin Planning Atlas
Importance: Willamette River terminology impact of 2012 FDFP vs. Stampher Road HOA/BHCN
Cross Ref BHCN .:None at this date – to be created <
Link BHCN : OSU_PNERC_Book_WRBPA
Link 1994_Jan_USGS_HTMC_MLPE_Index_OR <BHCN>
Link BHCN : BH_Kn_EVCR_LC_Foothills and, LOPL: LU_2012-0032

Document Attributes
Author (s)…….: D. Richey
Entity ……..: OSU_Forest_Sci_Labs Oregon State University Forest Science Labs
Project WRBPA <Short> = Willamette River Basin Planning Atlas
Date Published : 2002 Apr 24 Wednesday 22:00 U [10:00 PM PT] <Doc Meta Data>
Date Posted …. : Unkown
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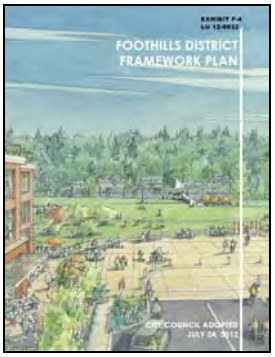
12 Docs/Sites wrt FDFP Report(s)

Return to first page: **2019 Jun BH TS CE WVSOM EIS**

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

12.01 Essential



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Sub (Title 2) .: LOCC Adopted, RSLT 12-41 <Srce LOPL: LU_2012-0032>
LOPL: Exhibit F-4: Foothills District Framework Plan, Adopted 07/24/12 (Part 1)
BHCN : 2012_Jul_WDLE_Rept_FDFP_P1F2
Post LOPL: _____
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Site: BH_Knw_LO_LU_Projects
Illustrates ….: Evolution of FDFP without Metro LOPT Streetcar
File LOPL: exhibit_f-4_foothillsl_framework_plan_final_09-13-12-adopted_07-24-12_part-1.pdf
File BHCN ...: REPT_WDLE_FDFP_F-4_LOCC_Adpt_2012_09Sep_13Th_1700U.pdf
Size : 24,767 kb, Page(s): 190

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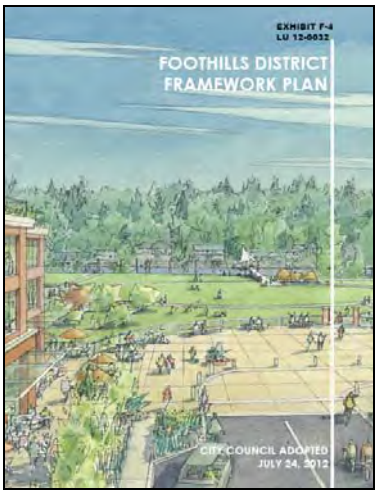

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LOPL: Exhibit F-4: Foothills District Framework Plan, Adopted 07/24/12 (Part 1)
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Illustrates ….: Evolution of FDFP without Metro LOPT Streetcar
Importance: 2012 Strategic (Vision) Plan effort for Foothills District
Cross Ref: LOPL Nbhd Snapshop Info circa 2011 FT / FTHL / Foothills - Not Rcgn
Visit: BH_Kn_Gv_Org_Nbhd_Accs
See: 2011_Jan_LOPL_SMPA_FTHL LOPL_PJ_FTHL LFTHL / LNAC / LOPN
Portland Bureau of Environmental Services (BES / PBES)
PBES_TCWTP Tryon Creek Wastewater Treatment Plant (Homepage)
City of Lake Oswego Department of Public Works (BES / PBES)
LOPW LOPW_TCWTP > BHCN: BH_Kn_TCWTP_2017 >
. Metro: MTRO_LIB_LOPT_Arch , BHCN: loptland
Document Attributes
Author (s).....: WDWD = WD =Williams Dame and White Developers
Entity ……..: LOED = LE = LO Econ Development, Fnct Wrapped in to LORA Circa 2015?
LORA = LR = Lake Oswego Renewal Agency
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\LU_12-0032_Dist_Plan_Spc_Foothills\03_WBPG_Files

13 Docs/Sites wrt Linked Projects

Return to first page: **2019 Jun BH TS CE WVSOM EIS**

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
	Document thumbnail(s) and extract outline	Document information details

13.01

BH Webpage –

Title … : 0902001bh00lcfh
Birdshill CPO / NA Knowledge Page for
Projects affecting BH wrt Locale: Foothills

Site URL for link: BH_Kn_EVCR_LC_Foothills
https://sites.google.com/site/bhpbendv/home/0902010bh00lc/0902010bh00lcfh

Webs2page Label : 0902010bh00lcfh ..... = BH_Kn_EVCR_LC_Foothills
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Page Revised .....: 2019 Jun 09 Sunday 13:00 U [1:00 PM PT] <circa>

14 Docs/Sites wrt Knowledge Base

Return to first page: **2019 Jun BH TS CE WVSOM EIS**

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
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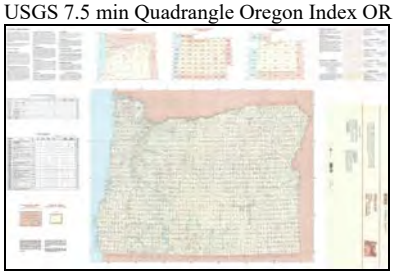
USGS 7.5 min Quadrangle Oregon Index OR



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Post 2: Current 2011-Fwd USGS_Ntnl_Map , US_Topo
Cross Ref USGS .: 1984_Jan_USGS_HTMC_MPPD_Quad_LO
Cross Ref USGS .: 2004_Apr_USGS_RPPA_Map_Symbols_HTMC
Illustrates ….: Index to HTMC and US Topo 7.5 min quads covering State of Oregon
Importance: Support / Access
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Entity ……...: USGS_wkpd = USGS wikipedia
Parent (Cabinet Level) USDOI_wkpd = US Dept of Interior
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14.02
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Image File BHCN:
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Post 2: Current 2011-Fwd USGS_Ntnl_Map , US_Topo
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Cross Ref USGS .: 2004_Apr_USGS_RPPA_Map_Symbols_HTMC
Illustrates ….: 1984 USGS Quadrangle 7.5 min Series Oregon Lake Oswego
Note: Last edition to have river mile notation (x) on map
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S1Pg: BH_Kn_Map_Lv_0100_USGS , Site: BH_Knowledge_Maps
Importance: Support / Access
Author (s)…….: USGS = United States Geologic Survey
Entity ……...: USGS_wkpd = USGS wikipedia
Parent (Cabinet Level) USDOI_wkpd = US Dept of Interior
Date Published : 1984 Jan 01 Sunday <BH Assume – Photo Revised>
1995 Nov 02 Thursday <USGS Archived, date for the record see stamp>
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Essential

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Link USGS .: 2004_Apr_USGS_RPPA_Map_Symbols_HTMC
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Illustrates ….: Map Symbols for USGS 7.5 Minute Quadrangles (Quads)
<Historical Topographic Map Collection (USGS_HTMC) >
prior to digital editions <US_Topo> circa 2013
Importance: Map Symbols including river mile marks for Columbia and Willamette River
Cross Ref USGS .: 1994_Jan_USGS_HTMC_MLPE_Index_OR
Cross Ref USGS .: 1984_Jan_USGS_HTMC_MPPD_Quad_LO
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Size .....: 2,106 kb, Page(s): 4

14.02.02
Key Feature(s)

Key Document Features:
1. Has river mile symbols for Willamette River, Article – See: River_Mile_wkpd
2. Term: “Reach of River” (ie named and defined segment), Article See: Reach_wkpd

Cross Ref ID	**Document Information –** Hyperlink notes: See => Specific document, Visit => Goto designated site / webpage	
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14.02

Image File BHCN:
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Illustrates ….: 2017 USGS Quadrangle 7.5 min Series Oregon Lake Oswego
Note: Edition DOES NOT HAVE river mile notation (x) on map
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Importance: Support / Access
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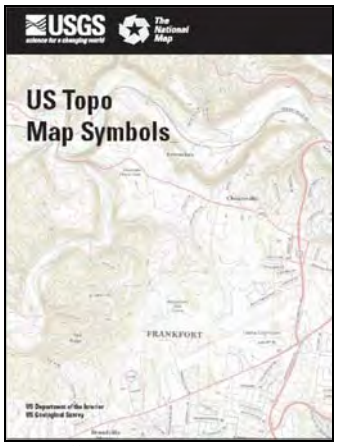

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Post 2: Current 2011-Fwd USGS_Ntnl_Map, US_Topo
Illustrates ….: 2017 USGS Quadrangle 7.5 min Series Oregon Lake Oswego
Note: Edition DOES NOT HAVE river mile notation (x) on map
Post: BH Knw Map Lv 0100 USGS, Site: BH Map Knowledge
Importance: Support / Access
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File Attachment(s) (Imbedded) Quantity 2, Only 1 can be downloaded:
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File Source …..: US Topo Map Symbols.pdf
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Key Document Features:
1. Layers with user option to turn on / turn off (display / no display)
2. Imbedded document(s): Map Symbols (Downloadable), Map Metadata Report (Web accessible only)

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Return to first page: **2019 Jun BH TS CE WVSOM EIS**

16	Project Headers and Scratch Pads

Return to first page: **2019 Jun BH TS CE WVSOM EIS**

[Non-DoD Source] FW: Challenge/Issue/Resource

Shelley Reed <sreedp@msn.com>

Thu 6/27/2019 3:37 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

One more time!

Sent from Mail for Windows 10

From: Shelley Reed <sreedp@msn.com>
Sent: Thursday, June 27, 2019 1:34:10 PM
To: willamette.eis.is@usace.aemy.mil
Cc: Dan Whelan; Vicki.Walker@or.us; Steve Cornacchia
Subject: Challenge/Issue/Resource

The Willamette Valley System Operations and Maintenance Environmental Impact Statement

PUBLIC COMMENT BY RIVER ROAD WATER CONTROL SUB-DISTRICT ONE

Challenge/Issue and Resource: Aged and unstable riverbank protection infrastructure susceptible to damage from flood management operations

Project Purpose: Flood Risk Management

We are a water control district initiated in 1967, formalized in 1970 through Lane County under ORS Chapter 553. Based on historical information made available to us through the Corps, it appears that we were formed pursuant to the creation of Lane County Improvement District One, for reasons unknown to the current board.

It is our wish to provide the Corps with documentation of our challenges, but our extremely limited budget requires us to provide you with educated guesses inferred from historical sources on much of our issues.

We are charged with the maintenance and operation of nine revetments within eleven river miles, from East Beacon Drive to the Harrisburg railroad bridges. Although we collect property taxes within that area, we are in possession of only one contract detailing our obligations for one revetment. Our other obligations are inferred based on our tax base, which is a bit opaque given that the Corps operates other revetments within our area; and formerly based on annual maintenance assessment reports from the Corps which stopped being provided to us in 2008.

For reasons unknown to the current board, the tax rate established for our district is $.28 per $1,000 assessed value, rendering an annual income today of $12,000. This amount was established by the board president at inception with the promise that the District would do minor repairs and continue to depend on the Corps for larger repairs. Based on a repair estimate of $225 per lineal foot specific to one revetment provided to us from an engineering firm last August, our total potential liability is $4,068,900. Over the last twenty years the District has accumulated $120,000. We have sought information on finding other financial resources given that we are taxing at our maximum rate. We have explored debt of which $180,000 over a 20 year term would be available to us based on our projected income which would include an annual 3% rate increase. This is insufficient to make repairs on any significantly damaged revetment, of which we are aware of a few as of 2008 and most likely have more.

Flood management through dam releases has adverse impacts on our old and weak revetments. For instance, with the recent flood, the first revetment in our district suffered increased damage from what was 800 lineal feet of complete loss as of last August to a loss post flood of 1,400 lineal feet out of a total 2,400 lineal feet, with a property loss of 10,000 cubic feet in April. Depending on the depth of the channel near this revetment, yet to be determined, if it is over 20 feet, the entire revetment is lost. This is not the biggest property loss within our district by any means, but it is the one we have spent our meager funds to measure.

A revetment on the right side of the river at the above described location was also destroyed, based on a post flood conversation with the president of the water control district charged with operating and maintaining that revetment. A district that is also severely underfunded.

In surveying randomly selected members of and around our district after the April flood to get a sense of damage and risks experienced during that flood, it was brought to our attention via video recording that the Corps' revetment 7A was now in the river, having been cut away from the riverbank, putting residences and agricultural businesses at risk. Without timely access to current maps detailing river miles, we cannot confirm nor deny that this is accurate. Although we do recall that members of the Corps visited this area after meeting with us in May.

Additionally, it was pointed out to us that a BPA tower was left much closer to the river. There are three such towers near three different riverbanks at this location. In speaking to the BPA we were told that one of these towers was indeed closer to the river and the riverbank would need to be shored up. The tower in question is said to sit on the left bank of the Willamette versus the one hovering over Spring Creek, it is our estimate that the tower on the main channel went from about 88 feet away from the river to around 47 feet, so these numbers could suggest one more "100 year flood" will take this tower down and the grid with it. This tower is just to the north of our Kelso revetment (when reviewed in 2006 by the Corps, mention was made of erosion near the north end of our revetment,) extension of our revetment might fix the situation, but clearly we do not have the money to navigate the multiple agencies necessary to engage in such a project let alone pay for the materials. In any case, this is infrastructure that needs to be protected.

In general, the people we spoke with agreed that the pattern of flood water dispersion was different than 1996 and that this flood came on lightening fast, not giving people enough time to prepare. One person, not in our district, but to the east of River Road, interviewed given that this water does not stop at the west side of River Road, a 40 year resident came home from work shocked to learn that her driveway was completely blocked, got help getting home to her ill husband and proceeded to watch as River Road was shut down in two directions. While Row River residents were given evacuation notices, we were given nothing and this was problematic for specific individuals in our area who had to or needed to, but couldn't, evacuate.

There seemed to be two groups of people most at risk: the elderly and infirm, and the freshman class, new residents who had no idea what to expect nor what to do about their islands in the rapid and dangerous streams. Power was lost, wires were hanging down and some people simply had no ability to leave their property. The story of the Campbell's near bankruptcy was well publicized, thankfully they have "only" lost $300,000 so far. One person shared that a niece works for 911 and they were inundated with calls from people who didn't know what to do. It would be nice to know what solutions were offered other than "turn around, don't drown." Some of us would have been going in tight circles.

In reviewing the Lane County Emergency Services letter sent before flood season, the most notable sentence in it was "try not to build on the flood plain." Perhaps the Lane County Building Department could give that a little thought.

The challenge is this, in the 50's-70's the federal government made it possible for these properties to be developed down to lots of less than one acre through its decision to control the flow of river water. Since then we have had a cultural shift that seeks to support environmental concerns with a seemingly silent battle taking place where those who do not live here put a high value on the health of endangered species, an admirable goal, but without having an open conversation with all the stakeholders. For example, our constituent who lives near Green Island was not included in the McKenzie River Trust's list of affected property owners about the changes they were making that would affect the flow of the river. Part of her property is now a part of that island, perhaps the result of their changes combined with the damages to our revetment, which should have been accounted for in their application, or simply a product of the narrowing of channels caused by floods and the resultant buildup of gravel bars which, unfortunately for everyone downstream including allegedly your revetment Location 7A, increase the velocity of the river and push the river west while enriching the inventory of the McKenzie River Trust.

Unwinding historical changes to the river without accounting for the people who live and make a living along the river and have for over a century in many cases, is tantamount to the exercise of eminent domain. There is no communication between water boards, Lane County, Oregon State Lands – who own the river based on the high water mark as it shifts, EPA, NOAA, USFW, The Corps, etc. Policy changes are made that affect the operation of our district and we are never included in the conversation. The flow of the river was permanently changed, and now with efforts to restore the river that wandered as far as the coast range being

done without communication amongst stakeholders must have its limits unless the people whose lives and livelihoods that are ruined are recompensed.

We were told by the Corps that the April 8, 2019 flood was not as bad as November 1996. While school children in Junction City weren't out playing in the floodwater as they did in 1996, the effect of the flood was intense on properties within our district. In reviewing numbers from the Corps' historical database, flood levels were close. April 9 peak of 15.28 was a little less than the peak November 19, 1996 of 15.56.

Clearly, the issue is not that we don't want to protect our district and its citizens and high quality agricultural land, but it is the absurd gap in funding needed vs. funding provided that stands out. Ironically, as the Corps' budget has tightened, the financial responsibilities have fallen to small, severely underfunded water control districts.

We have been coached by a sympathetic Corps to plant trees, to seek out partnerships with the Long Tom Watershed Council which we were told would offer help for free. The trees have washed away at two different sites, and the Long Tom Watershed Council has declined to work with our constituents next to the above described revetment. A mystery, given that this revetment is near the confluence of the McKenzie and Willamette Rivers, a high value ecological site.

In speaking with the Long Tom Watershed Council, while awaiting specific information about this specific site, we were informed that the Watershed Council is a small organization that must prioritize the number of projects it undertakes. It works as a conduit for grant money provided by government agencies, state and federal as well as other non-profits, and that it was possible that this project was not large enough to garner interest from those parties. It's not enough for the property owners to be interested in working with them, there must be investors interested in funding the project. We were told that the Council had worked on one project, the removal of culverts impeding fish passage, for 10 years to get it accomplished. This is not the font of money that was suggested to us.

Historical descriptions in proposals to build these revetments talk about flood risk and concern about damage to agricultural land, losses measured as the net present value of income generated from land that is lost in riverbank erosion from floods and later, dam water releases, including lost wages, something no longer valued by the Corps. as reflected by the low risk/low value rating on our district lands.

We ask that you revalue our district properties to be consistent with the value of the properties as the source of food consumed locally and throughout the world, the lawns installed in city lots, sources of income for families and respect for the people who live here.

We also ask that all water control districts charged with riverbank erosion control be included in all future communications regarding river flow changes created by all parties within and coterminus to each district.

Respectfully submitted,

River Road Water Control Sub District One

Sent from Mail for Windows 10

[Non-DoD Source] scoping on Willamette Valley System

Stauffer Farms <staufferfarmsinc@yahoo.com>

Fri 5/31/2019 4:32 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

U. S. Army Corps of Engineers
CENWP-PME-E
ATTN: Suzanne Hill
P. O. Box 2946
Portland, Oregon 97208-2946
Email: willamette.eis@usace.army.mil

Re: Scoping Comments on Willamette Valley System Evaluation

Ms. Hill,

Thank you for the opportunity to comment on the Willamette Valley System Evaluation. I am a farmer in the Willamette Valley and am writing to express the importance of continuing to maintain the system for flood control and irrigation storage. We have been hearing much in the Valley around both the Willamette Reallocation and potential changes to the operations of the Willamette system dams to benefit fisheries. While we share in the desire to have healthy salmon populations, we do not believe that it is appropriate or wise to adjust the Willamette system operations to experiment with flow regimes or storage regimes that may or may not provide a greater fisheries benefit.

These dams are critical to protecting farms, homes and communities from growing flood risk and we all saw first-hand this spring the impact releases from the dams can have on communities. We need to ensure that the dams retain their primary function of flood control and that any adjustments made to the system operations do not reduce or alter flood mitigation.

In addition, I oppose reducing the water storage capacity behind dams. This water is critical for future irrigation and community needs, particularly as we trend toward having longer, hotter summers. Oregon Department of Agriculture's recent studies show that irrigation demand is going to exponentially grow in the Willamette Valley in the next several decades as we become an even more critical part of the global food economy. We desperately need additional water supplies to ensure this vital part of our economy is able to adjust to changing conditions and continue to provide a safe, reliable supply of food and fiber to our state, region and our world.

Thank you for this opportunity to comment.

Sincerely,

Sheryl Stauffer
Stauffer Farms, Inc.
13851 Stauffer Road, NE
Hubbard, Oregon 97032
Tel: 503-982-9393
Fax: 503-982-5065

[Non-DoD Source] scoping comments from ODOT for the WVS Project EIS effort (DUE/submitted to USACE 6-28-19)

WHITE Susan <Susan.WHITE@odot.state.or.us>

Fri 6/28/2019 4:57 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

Cc:BROUWER Travis <Travis.BROUWER@odot.state.or.us>;

Hello,
The Oregon Department of Transportation is providing comments for the NEPA scoping phase of the subject EIS, as follows:

For any state highways, including interstates and other highways on the National Highway System, that are located near WVS dams and flood control devices, reservoirs, and hatcheries, ODOT should be coordinated with in order to avoid any adverse impact from both permanent impacts as well as construction-related temporary impacts from the WVS Proposed Action and the Selected Alternative on those inter- and intra-state highways and to the traveling public.

Specifically, if through coordination with ODOT it is anticipated that any part of the WVS Proposed Action and the Selected Alternative would create traffic impacts, a traffic impact study (TIS), and potential cooperative agreements with required mititgation, may be warranted. The traffic impact study and any resultant cooperative improvement agreement or plan related to traffic impacts and required mitigation, and any access needed on or adjacent to ODOT highway rights-of-way, may require review and approval by ODOT. In addition, various permits may be needed to accommodate any oversized vehicles needed to implement the WVS Proposed Action and the Selected Alternative during construction or any installment and associated hauling and storage of equipment needed for the project (both temporarily and permanently). The link to ODOT's Permitting Page is here: Blockedhttps://www.oregon.gov/ODOT/Maintenance/Pages/index.aspx

In addition, any changes to existing dams or reservoirs or their associated operations, riverbank protection projects, or fish hatchery programs that may cause impacts to regular state highway operations and maintenance activities other than traffic impacts (i.e., changes or new measures that could cause increased potential for flooding on state highways, change access to or otherwise encroach upon state highway rights-of-way, require USACOE owned access road changes, etc.) should be coordinated with ODOT in order to allow state highways to continue to operate safely and efficiently without adverse impacts. Any Corps proposed action that could result in impacts to, or changes needed on, any ODOT bridge, culvert, or other structure on the state highway system should be discussed in detail with ODOT prior to any decisions made.

Thank you for the opportunity to comment during the NEPA scoping phase. If you have any questions, please contact me.

Susan

Susan D. White
NEPA Program Coordinator

Oregon Department of Transportation (ODOT)
GeoEnvironmental Section (GES)
4040 Fairview Industrial Drive SE
Salem, Oregon 97302
503-986-3519 (direct)
503-986-3252 (main)

-

[Non-DoD Source] WVS EIS: meetings, scoping, comments, etc.

WHITE Susan <Susan.WHITE@odot.state.or.us>

Thu 5/2/2019 2:06 PM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>;

Hello,
ODOT is tracking, and has interest in, the development of the Corps' subject EIS described in the April 1, 2019 NOI in the Federal Register. Your NOI states that "*Written comments for consideration in the development of the scope of the NEPA EIS are due to the addresses below no later than June 28, 2019*" and your email announcement also dated April 1, 2019 (from Suzanne Hill, USACE) states further that "*A number of public meetings will be held during the scoping period. The specific dates, times, and locations of the meetings will be published on the Corps' website for this EIS: Blockedhttps://www.nwp.usace.army.mil/Locations/Willamette-Valley/Evaluation/. We will also provide email notification of the meetings. These meetings are planned to be held in May and June 2019.*"

I'm not sure when the official scoping period started, or will start. Can you please clarify those dates for me? Since I don't see any specific problem statement, alternatives, or issues to date to comment on at this early stage, what kind of comments are you soliciting (from agencies, in particular) "*for consideration in the development of the scope of the NEPA EIS"?*

Also, could you please **add my name and contact information (below) to your WVS EIS email list** so ODOT knows when public meetings are being held and the EIS schedule? To date I've not seen any meeting or EIS schedule posted to your website. Also, can you verify that this is the WVS EIS website where all your meetings and the EIS schedule are to be posted: Blockedhttps://www.nwp.usace.army.mil/Locations/Willamette-Valley/System-Evaluation-EIS/ ? My email address is: susan.white@odot.state.or.us

Thank you,
Susan

Susan D. White
NEPA Program Coordinator
Oregon Department of Transportation (ODOT)
GeoEnvironmental Section (GES)
4040 Fairview Industrial Drive SE
Salem, Oregon 97302
503-986-3519 (direct)
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Kai Mapohaku
Name (First, Last)

ME
Organization

Eug, OR
City, State

Cogent tongue@Gmail.com
Email

☐ Please check if you would like to receive email notifications about this project.

Comment(s). Please use this space to provide comment(s) to the Corps.

New designs prospects that are currenty engineered and ready, but are not being implemented locally. Perhaps in other countries?

PUBLIC COMMENT PERIOD CLOSING DATE: JUNE 28, 2019

John Zielinski
Name (First, Last)

Marion County Farm Bureau
Organization

Salem OR
City, State

john@ezorchards.com
Email

☐ Please check if you would like to receive email notifications about this project.

Comment(s). Please use this space to provide comment(s) to the Corps.

Will the TMDL be a part of the EIS, if ag land has increased flooding it would stand to reason that there would be increased mercury deposits. With a changing climate the need for water is increasing. I would like to see the Allocation for Ag to be higher than the current 327.5 Acft.

Bank erosion is an issue for many farmers with property bordering the Willamette

PUBLIC COMMENT PERIOD CLOSING DATE: JUNE 28, 2019

Doug Heiken
Name (First, Last)

Oregon Wild
Organization

Eugene, Oregon
City, State

dh@oregonwild.org
Email

☒ Please check if you would like to receive email notifications about this project.

Comment(s). Please use this space to provide comment(s) to the Corps.

Remove revetments where possible. Let river dynamics happen.

Remove weeds on banks & gravel bars & islands, maybe using high flows. manual removal and

Does Dexter need ~~trapper~~ better upstream fish collection?

Enhance system for lamprey conservation/restoration.

Adjust system to conserve/restore freshwater mussels & turtles. macroinvertebrates.

Land aquisition in floodplain to allow avulsion, river migration. river otters, salamanders, frogs

Don't let water reallocation process limit options for conservation.

Favor native fish over hatchery fish.

PUBLIC COMMENT PERIOD CLOSING DATE: JUNE 28, 2019

NETWORK of OREGON
WATERSHED COUNCILS

To: U.S. Army Corps of Engineers, Portland District, P.O. Box 2946,
Attn: CENWP-PME-E, Portland, OR 97208-2946
From: The Network of Oregon Watershed Councils

June 26, 2019

To Whom It May Concern,

We are writing to offer input into the development of the EIS scoping document process for the Willamette Valley basin.

By statute, Watershed Councils in Oregon were created to help preserve and restore watershed system health for those who depend on the ecosystem system services they provide and to protect and enhance fish and wildlife habitat in those systems. The USACE's management of the thirteen dams and the 100+ miles of revetments in the Willamette Bank Protection Program along the Willamette and its tributaries greatly impact the systems that watershed councils in the Willamette Valley are intended to protect and restore.

Dams in the Willamette basin are artificial but necessary barriers to natural watershed system health. Our request in the scoping document being developed is that the Corps work with local councils on issues that impact water quality and quantity and fish and wildlife habitat upstream and downstream of these dams. We believe there is a balance between the Corps mission of flood control and Councils' mission of protecting and restoring watershed health.

Upstream it is hoped that the Corps work to limit those inputs that lead to the growth of toxic algae blooms in reservoirs, sediment overloads and high water temperatures. In the reservoirs it is hoped that the scoping document include ways to monitor and treat water quality issues.

Downstream issues mostly concern fish habitat. Water quality and quantity can be impacted by how the dams are managed and operated. Water temperatures and sediment loads can also be impacted by the Corps management plan.

We encourage the Corps to identify and take opportunities for revetments to be removed or modified where ecological benefits can be achieved with low risk to infrastructure. Identifying areas where river processes such as erosion and deposition can be restored will increase overall river health. Increasing the extent and duration of floodplain and off-channel habitats helps reduce the intensity, severity, and frequency of flooding, with short and long-term benefits for infrastructure located in harm's way, and reduced costs to the state and federal governments in the long term. The USACE can also examine how it might develop a process to work with landowners when a revetment fails, to determine if alternatives

exist to replacement or reinforcement of the existing revetment. Local partners exist to work with USACE and landowners if these situations arise.

It is our hope that the Corps, in developing its scoping document and in the processes leading to an EIS, considers the Willamette watershed councils as partners, for this process and for input to the ongoing management of the dams. The Network of Watershed Councils also stands ready to work with the Corps, using our statewide resources and expertise in these issues. Please contact me for any further information on the Network, ways in which we can assist in this process, and any questions you may have about our interest in this process.

Respectfully,

Kelly Timchak

President | Network of Oregon Watershed Councils

June 28, 2019

Col. Aaron L. Dorf
U.S. Army Corps of Engineers District Commander
Portland District
P.O. Box 2946
Portland, OR 97208-2946

Sent via email to: willamette.eis@usace.army.mil.

Attn: CENWP-PME-E

Dear Col. Dorf,

Native Fish Society, Northwest Environmental Defense Center, WildEarth Guardians, WaterWatch of Oregon, McKenzie Flyfishers, Trout Unlimited, American Rivers, Northwest Guides and Anglers Association, The Conservation Angler, Whale & Dolphin Conservation, Molalla River Alliance, Cascadia Wildlands, and Willamette Riverkeeper respectfully submit these comments to the U.S. Army Corps of Engineers (Corps) regarding the scoping period for the Notice of Intent To Prepare an Environmental Impact Statement for the Willamette Valley System Operations and Maintenance. Our groups have a strong interest in the recovery of wild Upper Willamette River (UWR) spring Chinook salmon and winter steelhead and encourage the action agencies to substantively consider the comments contained in this letter.

For the first time in nearly forty years, the Corps and the associated action agencies, Bonneville Power Administration (BPA) and Bureau of Reclamation (Reclamation), will be undertaking a comprehensive evaluation of ongoing operations of the Willamette Valley System (WVS). It is our

understanding that the environmental impact statement produced in this analysis will be utilized as the basis for Endangered Species Act (ESA) section 7 consultation with the National Oceanic and Atmospheric Association National Marine Fisheries Service (NOAA Fisheries) and will inform the next Biological Opinion (BiOp) for listed UWR spring Chinook salmon and winter steelhead.

We commend the Corps for undertaking the National Environmental Policy Act (NEPA) process in conjunction with ESA consultation of systems operations. This provides the public and the agencies with an opportunity to engage with one another in a manner not available through standard ESA consultation alone. We encourage the action agencies to view this as a meaningful opportunity to co-create with the public a future for the Willamette basin that includes abundant, wild fish, healthy rivers, and thriving local communities.

The following comments are submitted during the NEPA scoping period for consideration in the formulation of the draft environmental impact statement:

I. *Authorized Purposes: The Corps has the legal authority and management discretion to manage the WVS for the benefit of threatened fish where doing so does not impair flood control or the maintenance of human health and safety.*

The action agencies must craft alternatives based on their legal duties to ensure the WVS allows the ESA-listed fish to survive and recover under the ESA. To do so, the agency must consult with NMFS, ODFW, and the tribes. If the agencies wait until after the DEIS to do so, NMFS may require additional or substantially different alternative actions to avoid jeopardizing the species.

The agencies must consider alternatives that prioritize ESA-listed fish above other project purposes. The Ninth Circuit and U.S. District Court of Oregon have recognized the Corps' discretion to manage dams on the Columbia River for the benefit of threatened fish. *NWF v. NMFS*, 524 F.3d at 928-29; Nat'l *Wildlife Fed'n v Nat'l Marine Fisheries Serv.*, 2005 WL 1278878, at *9-10 (D. Or. May 26, 2005). The Flood Control Acts authorizing these federal dams imposed broad goals but did not dictate how the Corps must fulfill those goals, giving the agency considerable discretion in choosing what specific actions to take. *See NWF v. NMFS*, 524 F.3d at 928-29. Moreover, subsequent to the Flood Control Act of 1950, the Fish and Wildlife Coordination Act and the Northwest Power Act specifically called for fish and wildlife conservation when managing the dams. *Id.* at 929 n. 8; *NWF vs NMFS*, 524 F.3d at 929.

Because of the Corps' management discretion, the agency must operate the dams in compliance with the ESA's no-jeopardy mandate regardless of the expense or burden. *Id.* at 929. Thus, these courts have ordered the Corps to conduct operations to benefit fish at the expense of other project purposes like hydropower. *NWF v. NMFS* , 2017 WL 1829588, at *6, Aff'd, 886 F.3d 803.

Other courts have recognized that Flood Control Acts impose broad goals, and the Corps has broad discretion when balancing the multiple uses of dams, requiring compliance with the ESA. These include: *Miccosukee Tribe of Indians of Florida v. U.S. Army Corps of Eng'rs*, 716F.3d 535, 541-45 (11th Cir. 2013); *In re: Operation of the Missouri River System Litigation*, 421 F3d 618, 625 (8th Cir. 2005); *Am. Rivers v. U.S. Corps of Eng'rs*, 271 F.Supp.2d 230, 252-53 (D.D.C. 2003).

The same reasoning applies to the Willamette Project. The Willamette Project was authorized by Flood Control Acts—including the one that applied to the Columbia River dams—that impose broad goals and do not mandate specific dam operations. (*See* supra p. 4; Flood Control Act of 1950, Pub L. No. 81-516, § 204, 64 Stat. 163, 178-79 (1950)). Accordingly, the Corps has the discretion to alter the management of the Willamette dams to benefit ESA-listed species at the expense of other uses—including power production—just as it does with the Columbia dams. The ESA requires the Corps to exercise that discretion to benefit ESA-listed species, even if that requires prioritizing fish needs above other authorized purposes like hydropower and recreation.

Even if the Corps lacked authority to conduct operations or make improvements to the WVS to protect ESA-listed fish, the Corps should seek authorization from Congress to do so. Indeed, the 2008 Biological Opinion RPA required the Corps to identify where the agency lacks the authority to accomplish the required measures and to seek Congressional authorization where necessary to complete the mandated actions (RPA 4.8 (Interim Downstream Fish Passage through Reservoirs and Dams); 4.12 (Long-term fish passage solutions); 5.1.3 (Complex Interim Water Quality Measures) 5.2 (Water Temperature Control Facilities and Operations) 5.3.4 (Protecting Water Quality during Emergency and Unusual Events or Conditions)). The claim that the Corps lacks the legal authority or authorization to fully and substantively implement the RPA is an indication of the Corps' failure to identify and seek the necessary Congressional authorization as directed.

II. *Given the Corps' legal discretion and ESA obligations, the agency must consider operational and structural alternatives which may impact other authorized purposes (excluding flood control and the maintenance of human health and safety) but may be beneficial to meet the recovery needs and mandates of ESA-listed species.*

Because UWR spring Chinook salmon and winter steelhead are listed as threatened under the Endangered Species Act, the Corps has a duty to ensure the dams do not jeopardize their survival and recovery. NOAA Fisheries issued a complete list of actions in 2008, identified in a Biological Opinion, that the Corps and associated action agencies must take to protect these species and ensure recovery. NOAA Fisheries said that the critical actions needed to recover Willamette salmon and steelhead are fish passage for adults and juveniles, improved water temps and flows downstream of dams, downstream habitat restoration, and completed Hatchery Genetic Management Plans.

The action agencies should utilize the WVS analysis and associated ESA consultation as an opportunity to craft and execute a roadmap to recovery for the Willamette basin. Utilizing the best available science, the agencies should evaluate the multitude of operational and infrastructural adjustments that could be made to improve the root causes of wild fish decline and loss of ecosystem function in the basin.

Given the precarious state of ESA-listed fish and the failure of the Corps to meet significant timelines outlined in the 2008 BiOp, the agency should evaluate and select alternatives in the WVS analysis that can be implemented in the near term while planning, design, and construction commences for longer term solutions. Proposed action alternatives should be designed and evaluated with flexibility for future modifications in mind and selected measures must include robust timelines, metrics, and methods for evaluation.

The following are a number of actions that the agencies should consider within the scope and alternatives analysis for the WVS EIS. Many of these actions are interrelated and it is critical that the agencies evaluate these connections, associated opportunity costs, and levels of uncertainty. Actions for consideration in alternative development include:

A. Modeling: The Corps should remodel the Operations and Maintenance Team Report and Configuration/Operations Plan alternatives This evaluation SHOULD NOT be constrained by previous assumptions that the Corps must maximize or fulfill authorized purposes except for flood control and the maintenance of human health and safety (*see* part I of these comments).

B. Hydropower: The Corps must produce and evaluate alternatives which may modify, reduce, or eliminate power production at Detroit, Big Cliff, Green Peter, Foster, Cougar, Lookout Point, Dexter, and Hills Creek. Present hydropower operations conflict with operational and infrastructural measures that could significantly improve juvenile migration and survival and adult returns. The Corps should evaluate the following:

    1. Modification of hydropower production: The Corps should consider eliminating power peaking, turning off turbines during migration periods in association with reservoir drawdowns, delayed refill, spill operations, the removal of turbines at hydropower projects to provide a passage route for fish in combination with timed drawdowns, and the conversion of specific projects to run-of-the-river operations without power generation.

    2. Modification or removal of non-flood control dams: Dexter and Big Cliff are hydropower reregulation dams that do not serve any flood control purposes. As such, the Corps must produce and evaluate alternatives which include consideration of modifying or removing these dams to support the recovery of listed salmonids. Operating these dams as run-of-the-river without hydropower operations, or removing them completely, will enable the Corps to evaluate operational changes to Lookout Point and Detroit that are currently constrained by the presence and operation of the reregulation dams. For instance, establishing volitional juvenile downstream passage at the reregulating dams may enable volitional juvenile downstream passage at Detroit and Lookout Point to be more successful as fish could be passed through the primary dam without then having to navigate another reservoir and dam.

    3. Costs: The Corps should analyze the current and future costs of power production on the Willamette compared to other project systems in BPAs portfolio along with evaluation of expected changes in electrical production and distribution in the region that will impact future power demand and generation.

4. Maintenance: Any remaining hydropower infrastructure should be maintained on explicit schedules designed to result in the least interference to fish passage, water quality, water flows, and other recovery objectives.

C. Juvenile Downstream Passage: Fish passage studies conducted throughout the project demonstrate that the highest rate of juvenile emigration through project reservoirs and dam structures takes place at and near the minimum conservation pool elevation. However, at present this emigration takes place during the fall and winter months during project drawdown, while fish enter the reservoirs throughout the year but mostly in the spring and summer months. Studies have also shown that the longer fish are in the reservoirs the lower the cohort survival. Research also indicates that larger sized juvenile fish have higher return rates at present. In combination, this information stresses the importance of the variety of life histories in the basin. Drawdown analysis should include consideration of methods that address this diversity of life histories and their corresponding biological needs.

The seasonal draft and refill operation of the projects strongly affects fish passage timing and survival through the projects. Further, such operations substantially increase the complexity of juvenile collection facilities, like those currently proposed for Cougar and Detroit dams, as they would have to be designed for a wide range of reservoir water surface elevations and fluctuations in flows. Such complexity makes such systems both more difficult to engineer and install and increases the likelihood of failure.

Lowering reservoir pools to elevations that allow surface oriented fish to access various passage outlets (regulating outlets (ROs), penstocks, diversion tunnels) can provide increased rates of downstream fish passage than is available under present operations. Deep drawdowns have been conducted in recent years at Fall Creek and have shown that such operational practices may increase downstream passage of juvenile fish and have the added benefit of moving invasive and predatory species out of the reservoir ecosystem while also providing for the transport of sediment into the lower reaches of the system.

Similar to deep drawdowns, run-of-the-river operations could increase rates of downstream fish passage and increase dam passage survivability.

These alternatives would extend the period for which the projects provide potential storage for flood control, which is crucial as climate change makes severe weather and flooding more unpredictable. However, depending on timing, they could also reduce the Corps' ability to meet currently specified instream flow commitments, particularly during the summer and early fall when stored water is currently used to meet instream flow needs for juvenile rearing and adult spawning. In general, there are high rates of pre-spawn mortality in the basin and spawning success downstream from Project dams is poor and may grow worse as the climate continues to change. Evidence suggests that the greatest potential for survival and recovery of the species

is successful passage to and from the high-quality spawning habitat upstream from WVS reservoirs. These needs should be weighed against the need to store water for flow augmentation and other uses during the summer and fall.

The Corps should evaluate operations which will increase both juvenile dam passage efficiency and survival through methods such as deep drawdowns, spill, maintaining the large storage reservoirs at or near their minimum conservation pool (except as necessary to meet flood damage reduction goals), and run of river operations. The following passage opportunities should be evaluated:

1. Detroit: A fish collection facility (FCF) is currently being proposed but is not expected to be operational for downstream passage until 2028. Given that the facility will not be operational until well after the EIS is complete and that the completion of this project is highly uncertain, the Corps should not consider this project as part of the baseline or assume that it will be completed and successful. Given the limited number and mixed results to date of collectors currently in operation and the unique constraints of Detroit Dam and reservoir, the Corps should evaluate near term operations to improve fish passage over the next decade as well as evaluating the proposed FCF[1] and potential remedial reconfiguration or operations if fish collection efficiency or survival under the current proposed design proves insufficient. This includes:
    a) Fall/winter drawdown to regulating outlets (ROs) or remove one or more turbine units and drawdown to penstock gate opening with passage through "powerhouse" in conjunction with spring surface spill.
    b) Evaluate proposed FCF and associated handling and haul operations.
    c) Evaluate remedial design and operations alternatives for FCF including the use of:
        (1) Volitional bypass pipe.
        (2) Guidance and/or exclusion nets.
        (3) Pumped flow attraction.
        (4) A combination of fish collection at the facility with drawdowns and/or spill operations.

2. Big Cliff: Consider modification and elimination of hydropower operations along with run of the river operations or dam removal. *See* part II.B.2 of these comments.

3. Cougar: The present configuration provides several passage opportunities that would likely require less costly modifications than the currently proposed non-volitional fish collector. These include:
    a) Drawdown to run of river operations through the diversion tunnel.[2]

[1] Detroit Dam & Lake Downstream Passage Project must be evaluated as an alternative in the WVS NEPA analysis. Failing to do so would constitute impermissible segmentation. *See* part V of these comments.

[2] Temperature control operations would not be required as the river would self-regulate downstream temperatures.

b) Remove one or both turbine units and drawdown to penstock/RO gate opening with passage through "powerhouse."[3]
c) Utilize existing RO tunnel or modify to include a bypass pipe and drawdown to the penstock/RO gate opening.
(1) Evaluate modification to RO downstream opening to increase survivability at outlet.[4]

4. Hills Creek: The current dam structure is similar to Cougar Dam and presents several similar passage opportunities that would likely require modification of existing infrastructure. Unlike Cougar, Hills Creek does not have existing temperature control infrastructure. Passage opportunities include:
   a) Reopen the diversion tunnel and drawdown to run of river operations.[5]
   b) Remove one or both turbine units and drawdown to penstock/RO gate opening with passage through "powerhouse."
   c) Utilize existing RO tunnel or modify to include a bypass pipe and drawdown to the penstock/RO gate opening.
      (1) Evaluate modification to RO downstream opening to increase survivability.

5. Green Peter: At present, passage survivability through the existing fish bypass pipe infrastructure is high. However, reservoir survival and corresponding passage efficiency is low. The Corps should evaluate methods to increase reservoir survival and passage efficiency. These include:
   a) Reduce reservoir predation through deep drawdowns in fall/winter.
   b) Increase attraction flows to existing fish bypass pipe by turning off hydropower during migration in the spring and evaluate opportunities to further increase attraction flow to existing bypass infrastructure.
   c) Outplant adult hatchery Chinook salmon above Green Peter dam to study spawning success and juvenile downstream migration through Green Peter reservoir and dam.

6. Foster: For many years, a fish weir installed in one of the spillways has provided a passage route with high survival. An updated weir that can be utilized over an increased range of pool elevations was recently installed and has reduced dam passage survival. In the spring of 2019, the Corps prioritized increased spill (while minimizing hydropower production) to aid in downstream migration while evaluating modifications to the new weir structure to increase survival rates. However, like Green Peter, reservoir survival of juvenile fish in Foster reservoir is low, possibly due to a

[3] Temperature control would require reassessment and potential modification of existing infrastructure.
[4] Temperature control would require reassessment and potential modification of existing infrastructure.
[5] Temperature control operations would not be required as the river would self regulate downstream temperatures.

combination of predation and incidental catch in the recreational sport fishery. The Corps should evaluate methods to increase reservoir survival and passage efficiency. These include:

a) Reduce reservoir predation through deep drawdowns in fall/winter.
b) Increase attraction flows to the weir and/or spillways by turning off hydropower during migration in the spring.
c) Evaluate the impact of recreational fishing on juvenile steelhead and work with ODFW to reduce incidental harm from the fishery.

7. Lookout Point: NMFS has identified the Middle Fork as the most crucial run to restore and should have been a priority for completing fish passage under the 2008 BiOp. The Corps should prioritize Lookout Point for operational and structural alternatives that can be implemented as soon as possible. The Corps previously proposed and prepared a draft environmental assessment for deep drawdown operations at Lookout Point to assist in juvenile downstream passage; this proposal was strongly supported by the wildlife management agencies. The Corps should assess[6]:
    a) Fall/winter drawdown to ROs or removal of one or more turbine units and drawdown to penstock gate opening with passage through "powerhouse" in conjunction with spring surface spill.
    b) Fall/winter drawdown to ROs or modified penstocks with delayed refill.
    c) Run of the river operations.

8. Dexter: Consider modification and elimination of hydropower operations along with run of the river operations or dam removal. *See* part II.B.2 of these comments.

9. Fall Creek: Deep drawdowns are currently ongoing in late fall, and initial results indicate that this is a promising passage measure. The Corps should:
    a) Continue deep drawdowns in late fall and evaluate:
        (1) Additional deep drawdowns in the spring.
        (2) Implementing surface spill operations in the spring.
    b) Assess drawdown to run of river operations year round.

D. Adult Migration, Returns, and Trap & Haul: Downstream temperatures have been found to have a large impact on adult returns to the adult fish collection facilities. The infrastructure and handling operations at adult collection facilities also impacts the success of transporting adult fish above WVS projects. The Corps should evaluate infrastructural and operational alternatives for improving timing of adult migration, reducing prespawn mortality, and increasing the number of adults that are successfully transported into habitats above WVS projects including:

[6] These operations will require reassessment of downstream and mainstem flow augmentation and should be considered in conjunction with operations at Hills Creek.

1. Temperature control operations:

    a) Cougar: Temperature control tower infrastructure and operations are ongoing at Cougar and have been beneficial to reestablishing spring Chinook adult run timing. Temperature control operations and infrastructure will require reassessment for any downstream passage alternatives that result in reservoir elevations below the current operational range of the temperature control tower.

    b) Detroit: Modeling for Detroit temperature control structure suggests that the infrastructure will be successful in achieving the desired results in the North Santiam. This proposal should be evaluated in the context of the WVS analysis (*see* part V of these comments). The control structure should be designed to operate over the widest possible range of pool elevations to provide the greatest operational flexibility.

    c) Hills Creek & Lookout Point: Modeling has indicated that even with temperature control structures, it may not be possible to completely correct downstream temperature issues in the Middle Fork subbasin. Operations to improve temperatures in the nearterm should be evaluated including prioritizing spill in the spring/summer and the use of the ROs in the fall.

    d) Green Peter: Downstream temperature adjustment is necessary to improve run timing and increase adult returns. The Corps should evaluate long-term temperature control facilities as well as nearterm operational adjustments including spill in the spring.

2. Adult Collection Facilities: Many of the adult collection facilities have been updated and fish handling techniques have been improved. However, the adult collection facility at Dexter has not been updated. The Middle Fork is arguably the most important basin for increasing adult survival, collection, and transport due to the extremely high levels of prespawn mortality and low levels of spawning success downstream of Dexter Dam. Upgrading adult collection, handling, and transport in the Middle Fork should be evaluated in the WVS analysis.

E. Flows: The Corps should evaluate measures to improve flows for the recovery and benefit of fish and wildlife. The Corps should include the following in their analysis:

    1. Evaluate flow targets that consider the life cycle needs and requirements of all species of fish and wildlife, including needs for habitat formation and maintenance as well as biological functions such as spawning, rearing, and migration. The Corps also should determine these requirements for ESA-listed fish in particular but also for other species that use the system. This analysis should consider impacts of shifting flows toward the previous

natural hydrograph to the extent that could be done without creating unacceptable flood risk.

2. Actions the Corps and other action agencies could take to ensure that flow targets described above are met, including transfer of some portion of water-storage rights to instream water rights and actions to ensure that stored water released for instream use is protected from downstream diversions.

3. Alternatives for meeting flow targets, including those for ESA-listed fish, even in years of water shortage.

4. Revised operations to reduce rates of augmenting and attenuating natural flow. Under current operations, when operating projects to reduce downstream flood damage, inflows are stored aggressively to attenuate the flood peak, reducing discharge, then, once the flood wave is receding, discharge is increased to near maximum to bring the reservoir water surface elevation back to the desired pool elevation. This results in widely fluctuating discharge that adversely affects fish and habitats downstream. At times, such operations may be necessary and prudent. However, when storms are far apart, this aggressive approach is harsher than necessary on aquatic resources. The Corps should include an alternative that would reconfigure pre and post flood damage reduction operations. In particular, the alternative should describe measures necessary to revise the Project operating manuals to take greater advantage of forecasting services such that the rates of attenuating and augmenting the natural flow would be minimized while maintaining the current control point flow objectives.

5. The ongoing Willamette Basin Review and proposed storage water reallocation should be included in this systems analysis as a proposed alternative, not as an ongoing or no action alternative. This is necessary for the following reasons:
    a) The proposed reallocation will be implemented through the regular operations of the WVS. It is therefore inappropriate to segment this action from that of the systems' operations, which is the scope of this NEPA analysis. Failing to evaluate the impact of proposed reallocation is inconsistent with NEPA regulation 40 CFR 1508.25 on scope.[7]
    b) The reallocation currently proposed and in ESA consultation with NOAA Fisheries is not an existing or ongoing action and should not be treated as such in this NEPA process. Even after consultation with NOAA Fisheries has concluded and the Chief's report has been issued, there are numerous administrative, legislative, and legal steps that must be completed in order to implement the reallocation. As the reallocation of storage water has not yet proceeded, it is

[7] *See* part V of these comments regarding impermissible segmentation.

inappropriate to consider the proposal an ongoing action for inclusion in the no action alternative.

F. Improve water quality: Water quality in the reservoirs and downstream reaches is impacted by current project operations. Water temperatures and dissolved gas levels are particularly problematic for ESA-listed fish at numerous life stages including egg incubation, emergence, rearing, and adult returns. The following alternatives to improve water quality should be evaluated and include:

1. Reduce water temperatures below Lookout Point and Detroit dams in fall and winter by using the lowest ROs to discharge colder water during drawdown operations.

2. Improve water temperatures downstream of WVS projects in spring to improve adult migration to fish collection facilities.[8]

3. Reduce total dissolved gas at projects where it exceeds NOAA Fisheries Criteria. Evaluate the use of a "flip lip" at Big Cliff Dam.

4. Adopt and strictly follow maintenance schedules and emergency protocols provided by NMFS and ODFW to reduce water quality impacts during such events.

G. Improve downstream rearing habitat: Project operations and past revetments affect sediment transport, the movement of large woody debris, and habitat diversity downstream of WVS projects and in the mainstem Willamette River, and survivability of fry is low in many of these reaches. The Corps should evaluate methods to ameliorate these impacts and increase habitat suitability and diversity, especially for fry rearing. For example, funding and implementing gravel augmentation below Cougar Dam could greatly enhance the habitat restoration work in the South Fork McKenzie.

H. Reduce hatchery impacts: The Corps should ensure that hatchery programs adhere to Hatchery Genetic Management Plans to protect wild, ESA-listed fish from hatchery fish. The Corps should monitor and evaluate the rates of hatchery fish spawning in the wild (known as the percent hatchery origin spawners or "pHOS"). The Corps should have procedures in place to reduce straying if pHOS rates are exceeded.

I. Addressing opportunities outside the four priority basins: ESA-listed fish have been observed utilizing non-priority basins including the Molalla and Yamhill. The Corps should take the following action to support recovery of ESA-listed fish in these habitats including:

[8] *See* part II.D.1 of these comments.

1. Conduct a basin-wide assessment to identify anchor habitats in non-priority basins and opportunities to correct smaller passage barriers to provide fish access to those reaches.

2. Fund and implement habitat restoration and improvement in undammed tributaries like the Molalla, Tualatin, Luckiamute, Calapooia, Pudding, Yamhill, Marys, and Coast Fork Willamette.

3. Consider special guidance for regulatory programs operated by the Corps and other action agencies, including removal-fill permitting, to mitigate for impacts of the dams on listed fish.

J. Address Deferred Maintenance: The Corps should consider how addressing deferred maintenance may assist with fish recovery efforts including addressing "red tag" or inoperational ROs and other outlets.

III. *The Corps should include alternatives that may require modification of rule curves for WVS projects.*

In light of the impact to operations of the above proposed alternatives, the Corps should be prepared to re-evaluate and modify the rule curves for the WVS projects so as to support meaningful fish recovery while maintaining the primary authorized purpose of the WVS of flood control and the protection of human health and safety. The Corps and associated action agencies should identify the further studies and information needed to undertake such a revision.

IV. *The effects analysis must consider likely climate change scenarios utilizing the most recent available science.*

Climate change is expected to have significant impacts on the water resources available in the Willamette basin including changes in the type and timing of precipitation. Expected changes to temperatures, particularly during the summer months, are likely to result in increased water temperatures, especially in the mainstem Willamette River. Given these expected changes, providing access to high-quality, high-elevation habitats for aquatic species and ESA-listed fish is increasingly important.

The Corps must assess the impacts of possible alternatives within the frame of anticipated climate change over the intended duration of the next WVS operations plan and BiOp. This evaluation should include climate change projection scenarios across the range of foreseeable possibilities from best case to worst case including expected outcomes if current trends continue.

V. *The scope of the analysis requires inclusion and consideration of other proposed systems projects which will be implemented through the regular operations of the WVS.*

The Corps has several projects under NEPA and ESA consideration including the Willamette Basin Review, Detroit Dam & Lake Downstream Passage Project, and Cougar Dam & Reservoir Downstream Fish Passage Project. As of the submission of these comments, no Record of Decision has been completed for any of these projects nor have any of the projects and associated operations commenced. Furthermore, all of these projects will be carried out under the day-to-day operations of the WVS. These proposed projects have been previously evaluated under the assumed constraints

that the agency must maximize all authorized purposes, which part I of these comments explains is an inappropriate application of law.

The scope of a NEPA analysis requires that the above listed projects be included in the WVS analysis as they are "connected actions," "cumulative actions," and "similar actions" as defined by 40 CFR § 1508.25(a). *Am. Bird Conservancy, Inc. v. FCC*, 516 F.3d 1027, 1032 (D.C.Cir. 2008), and *Allison v. Dep't of Transp.*, 908 F.2d 1024, 1031 (D.C.Cir. 1990). Breaking up a project into smaller pieces, which individually may not have a significant impact, but for which taken together may represent a cumulatively significant impact represents impermissible segmentation. *NRDC v. Hodel*, 865 F.2d 288, 297 (D.C.Cir. 1988). The Supreme Court has held that, under NEPA, "proposals for ... actions that will have cumulative or synergistic environmental impact upon a region...pending concurrently before an agency...must be considered together. Only through comprehensive consideration of pending proposals can the agency evaluate different courses of action." *Kleppe v. Sierra Club*, 427 U.S. 390, 410, 96 S.Ct. 2718, 49 L.Ed.2d 576 (1976).

These projects should be incorporated as proposed alternatives, not as no action alternatives. None of these projects are currently operational and it is incorrect to consider them otherwise for the purposes of evaluation under NEPA. For instance, the Corps estimates that the Detroit temperature control tower will not be complete and in service until 2024, and the Detroit downstream passage fish collection facility isn't slated for operation until at least 2028. The agency has also professed that they expect to "learn" and possibly redesign Detroit passage from the operation of fish collection at the Cougar downstream facility (anticipated operation to commence in 2023). Similarly, implementation of reallocation of storage water under the Willamette Basin Review requires a number of legal and regulatory changes after completion of ESA consultation. None of these projects represent an ongoing agency action and treating them as such is a misapplication of the no action alternative under NEPA. Further, most, if not all, of these actions are not scheduled to be operational until after the completion of the system's EIS and corresponding Biological Opinion.

Given the necessity to reevaluate the downstream passage opportunities at both Detroit and Cougar as part of the WVS analysis, the Corps should remodel the Configuration/Operations Plan alternatives. This evaluation SHOULD NOT be constrained by previous assumptions that the Corps must maximize or fulfill authorized purposes except for flood control and the maintenance of human health and safety (*see* part I of these comments).

NEPA is, "in large measure, an attempt by Congress to instill in the environmental decision-making process a more comprehensive approach so that long term and cumulative effects of small and unrelated decisions could be recognized, evaluated and either avoided, mitigated, or accepted as the price to be paid for the major federal action under consideration." *NRDC v. Callaway*, 524 F.2d 79, 88 (2d Cir.1975). The Corps has a duty to adhere to the requirements of NEPA in completing the WVS analysis. Further, a properly executed analysis fulfills the Congressional intent and purpose of NEPA to provide the agencies and the public with the most complete understanding of the impacts of a proposed federal action.

VI. *The Corps should consider a host of other issues related to ESA-listed fish and the Willamette Basin ecosystem and the people who depend on this area and these resources.*

The rivers of the Willamette Basin provide a multitude of benefits to the people of Oregon including supporting: healthy ecosystems that supply drinking water to our communities, the cultural heritage needs of indigenous people and tribal nations, and commercial and recreational fishing economies. The Willamette River in Oregon flows 180 miles out of the Cascades and Coast Range Mountains to its confluence with the Columbia River in the city of Portland. The river drains 11,487 square miles, nearly 12% of the state, flowing through a wide, fertile valley that is home to 75% of Oregon's population and is the state's agricultural powerhouse. The Willamette has been important to many Native American tribes that have relied on the river for millennia for salmon, as a trading hub, and as a source of water and other critical resources.

Restoring natural processes that have been altered by dams will benefit our fish, our ecosystems, and our communities that depend on these homewaters. In light of the diversity of ecological and social benefits the rivers of the Willamette Basin provide, the Corps should include the following considerations in the WVS analysis:

A. Evaluate the costs and benefits of each alternative on local communities, economies, and tribes that rely on or value UWR fish.

B. Assess how the reservoirs contribute to climate change through the production of greenhouse gases.

C. Determine the full range of indirect, interrelated, and cumulative actions stemming from the operation and maintenance of all components of the WVS, including hatcheries, irrigation contracts, water delivery, etc.

D. Reclamation should refrain from issuing any additional irrigation contracts until sufficient water quantity is available to meet the flow needs of fish year round.

E. Evaluate a full range of alternatives to address the problems caused by revetments and to restore habitat needs in the mainstem Willamette River.

F. Consider how reservoirs and dam operations contribute to illegal poaching of ESA-listed fish.

G. Assess how recreational fishing in the reservoirs impacts ESA-listed fish and how access and/or policy changes could be implemented to reduce detrimental impacts.

H. Expand its purpose and need of the EIS to include the recovery of ESA-listed fish.

I. Consider an alternative in the EIS that evaluates eliminating hydropower completely.

J. Include consideration of BPA's precarious financial state when determining what funding will be available for future mitigation and restoration projects and whether BPA will continue operating the turbines in the long-term.

K. Analyze changes have occurred to the species, the WVS, the ecosystem, and the surrounding communities since the 1980 EIS. Determine what commensurate changes are needed as a result.

L. Consider how future flood control needs will be impacted by the 2016 biological opinion of NOAA Fisheries regarding the Federal Emergency Management Agency's flood insurance program in Oregon.

M. Ensure that properly qualified experts and technicians are included in the planning and execution of any events or operations that may offer the opportunity to document, protect, or recover cultural resources. The Corps should engage with the relevant tribal nations in undertaking this work and take the measures necessary to ensure that objects are neither desecrated or misappropriated.

N. Evaluate how the action agencies will fulfill any outstanding requirements relating to the National Historic Preservation Act and assess the effects of proposed operations on properties on or eligible for inclusion on the National Register of Historic Places.

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Thank you for accepting and considering these comments. Our collective organizations share a vision of abundant, wild fish returning to a healthy and thriving Willamette River basin that supports the many cultural, economic, social, and ecological needs of our communities and the landscape many of us call home. But we will only succeed if the agencies take seriously the important role they must play in achieving this goal. We urge you to think boldly, dare greatly, and embrace a forward looking and ambitious vision. It once took all of these attributes to create and build each one of the Willamette Valley System's dams. The agency has shown itself capable of achieving impressive feats in the past. The question is: Will you do so again?

Sincerely,

Jennifer Fairbrother
Campaign & Columbia Regional Director
Native Fish Society

Bob Rees & Rob Bignal
Northwest Guides & Anglers Association

Marlies Wierenga
Pacific NW Conservation Manager
WildEarth Guardians

Chandra Ferrari
Water Policy Advisor and Staff Attorney
Trout Unlimited

Brian Posewitz
Staff Attorney
WaterWatch of Oregon

Dave Thomas
Secretary, McKenzie Flyfishers
McKenzie River Steward, Native Fish Society

David Moyrc
Senior Director Wild & Scenic Rivers and Public Lands Policy
American Rivers

Jonah Sandford
Staff Attorney
Northwest Environmental Defense Center

David Moskowitz
Executive Director
The Conservation Angler

John Atkins
Molalla River Alliance

Colleen Weiler
Jessica Rekos Fellow
Whale and Dolphin Conservation

Elisabeth Holmes
Staff Attorney
Willamette Riverkeeper

Gabriel Scott
In-House Counsel
Cascadia Wildlands

Description of signatory organizations:

Native Fish Society (NFS) is an Oregon based non-profit organization dedicated to reviving the Pacific Northwest's abundant wild fish, free-flowing rivers, and thriving local communities. Native Fish Society is the leading science-based native fish conservation organization working in the Pacific Northwest, with 4,000 members and supporters and 89 volunteer River Stewards. Guided by the best available science, Native Fish Society advocates for the recovery and protection of wild, native fish and promotes the stewardship of the habitats that sustain them. Native Fish Society and its members have specific interests in the continued health of native Pacific Salmon species and their habitats.

WildEarth Guardians is a nonprofit conservation organization with offices in Oregon and six other states. WildEarth Guardians has more than 230,000 members and supporters across the United States and works to protect and restore wildlife, wild places, wild rivers, and the health of the American West. WildEarth Guardians and its members have specific interests in the continued health of native Pacific Salmon species and their habitats.

Northwest Environmental Defense Center (NEDC) is a nonprofit environmental organization based in Portland, Oregon, and composed of attorneys, law students, and members of the public. Since 1969, NEDC has pursued its mission of preserving and protecting the natural environment in the Pacific Northwest by providing legal support to individuals and grassroots organizations with environmental concerns, and engaging in litigation independently or in conjunction with other environmental groups. NEDC and its members have specific interests in the continued health of native Pacific Salmon species and their habitats.

McKenzie Flyfishers is a group of people based in Eugene, Oregon who share a common interest in flyfishing. The Club was conceived and organized in April of 1964 to: 1. Enjoy social contact with others interested in fly fishing; 2. Encourage fly fishing as a method of angling, and; 3. Protect and increase the fishery resources.

Trout Unlimited (TU) works to conserve, protect and restore North America's coldwater fisheries and their watersheds. By the next generation, Trout Unlimited will ensure that robust populations of native and wild coldwater fish once again thrive within their North American range, so that our children can enjoy healthy fisheries in their home waters.

Northwest Guides and Anglers Association was organized in 2004 to address sport fishing issues in the Pacific Northwest, specifically, Oregon and Washington.

American Rivers: Our mission is to protect wild rivers, restore damaged rivers, and conserve clean water for people and nature.

The Conservation Angler advocates for wild fish and fisheries. We work to protect, conserve and restore wild steelhead, salmon, trout and char throughout their Pacific range using all legal,

administrative and political means to prevent their extirpation. Our goal is to foster a long-term recovery of wild stocks to fishable and harvestable abundance.

Molalla River Alliance is a non-profit, all-volunteer conservation group of more than 100 civic and conservation organizations; local, state and federal agencies; numerous user groups; and local property owners. We are dedicated to preserving the water quality of the Molalla and sustaining the wildlife, fish and plants that inhabit its watershed. Also, we are committed to promoting a safe and healthy environment that encourages diverse enjoyment of the recreation corridor, including tourism and family-friendly activities.

Whale & Dolphin Conservation (WDC) is the leading global charity dedicated to the protection of whales and dolphins worldwide. Our mission is to amaze people with the wonder of whales and dolphins to inspire global action to protect them. We work globally through campaigns, research, educational outreach, advising governments, and work with state and federal agencies. Our vision of a world where every whale and dolphin is safe and free is not a noble gesture, but an essential means to sustain the future of our Earth by increasing the planet's climate resiliency.

WaterWatch of Oregon is a non-profit river conservation group dedicated to the protection and restoration of natural flows in Oregon's rivers. We work to ensure that enough water is protected in Oregon's rivers to sustain fish, wildlife, recreation and other public uses of Oregon's rivers, lakes and streams. We also work for balanced water laws and policies. WaterWatch has members across Oregon who care deeply about our rivers, their inhabitants and the effects of water laws and policies on these resources.

Willamette Riverkeeper (WRK) is a 501(c)(3) not-for-profit organization. WRK was founded in 1996, and focuses on protecting and restoring the resources of the Willamette River basin in Oregon. WRK works on programs and projects ranging from Clean Water Act compliance and river education, to Superfund cleanup and restoring habitat. WRK is concerned with all aspects of the WVS proposed project, including: flood control, irrigation, navigation, hydropower, fish and wildlife, water quality, recreation, and water supply. WRK has been long-time advocates for Pacific salmon and steelhead, including Upper Willamette River Chinook salmon and steelhead, and have long-standing concerns about the threat to these species from operation of the Willamette Project. WRK engages in public outreach and education, advocacy with agencies, agency administrative processes, and litigation to promote the protection of Upper Willamette River Chinook salmon and steelhead.

Cascadia Wildlands defends and restores Cascadia's wild ecosystems in the forests, in the courts, and in the streets. We envision vast old-growth forests, rivers full of salmon, wolves howling in the backcountry, and vibrant communities sustained by the unique landscapes of the Cascadia bioregion.

Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

April 17, 2019

U.S. Army Corps of Engineers
Portland District
ATTN: District Commander
P.O. Box 2946
Portland, OR 97208– 2946

RE: Portland District Willamette Valley System, Notice of Intent to prepare an EIS

Dear District Commander,

The Confederated Tribes and Bands of the Yakama Nation ("Yakama Nation") submits this letter to notify the U.S. Army Corps of Engineers ("USACE") of our interest in USACE's ***Notice of Intent to Prepare an Environmental Impact Statement*** **("EIS")** ***for the Willamette Valley System Operations and Maintenance***, published on April 1, 2019 in the Federal Register (84 FR 12237)

The promises guaranteed under the 1855 Treaty with the Yakamas (12 Stat. 951) include reserved rights within the Willamette Valley. Yakama Nation is concerned that proposals developed through any EIS may interfere with Yakama Nation's Treaty-reserved rights falling within Yakama Nation's usual and accustomed areas. Due to the importance of the activities being evaluated, Yakama Nation requests meaningful technical level engagement with USACE during the NEPA process and the development of the EIS.

Your cooperation and prompt response to this matter is appreciated. Please address your response to enviroreview@ yakama.com and contact Paul Ward, Manager, Yakama Nation Fisheries at 509-865-5121, ext. 6363, to further discuss this matter.

Sincerely,

Philip Rigdon, Superintendent
Department of Natural Resources

[Non-DoD Source] Re: ace regularly kills birds, mammals fish - they are awful environmentalists - they need shut down

jean public <jeanpublic1@gmail.com>

Mon 4/1/2019 11:09 AM

To:CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>; Kieran Suckling <center@biologicaldiversity.org>; The Pew Charitable Trusts <info@pewtrusts.org>; humanelines <humanelines@hsus.org>; PETA Info <info@peta.org>; INFORMATION@sierraclub.org <INFORMATION@sierraclub.org>; foe@foe.org <foe@foe.org>; info <info@earthjustice.org>;

public commentonf ederal register

i have found the usace ary corpt of engineers to be decidedly anti environmntal.they seem to have the idea that lets knock everything envirionmental flat on its back. i have seen that in action int he new jersey meadowlands, where they allowed endless building to take place when the area could haveand should hav been saved. i do not regard the employees at this agency as concedrning itself ever with environmental factors. it hink they are completey anti environmental.i would not call them in ever for a job. they use mass and motion and will run over everythign aliv ein their way. i note they have joined up with usfws, which also gives little to no protection to any animal these days. i would prefer no action. i would prefer sendint themto the border with mexico to set up a wall. that is needed. this work is not. this commetn is for the pubilc record. leave the area alone.it will always bee better than inviting in the usace army military. this commetn is for the public record.please receipt. jean publiee jean pubilc1@gmail.com

On Sun, Mar 31, 2019 at 3:15 PM jean public <jeanpublic1@gmail.com> wrote:

> [Federal Register Volume 84, Number 62 (Monday, April 1, 2019)]
> [Notices]
> [Pages 12237-12238]
> From the Federal Register Online via the Government Publishing Office [Blockedwww.gpo.gov]
> [FR Doc No: 2019-06258]
>
> ---
>
> DEPARTMENT OF DEFENSE
>
> Department of the Army, Army Corps of Engineers
>
> Notice of Intent To Prepare an Environmental Impact Statement for
> the Willamette Valley System Operations and Maintenance
>
> AGENCY: Department of the Army, U.S. Army Corps of Engineers, DoD.
>
> ACTION: Notice of intent.
>
> ---
>
> SUMMARY: The Portland District, U.S. Army Corps of Engineers (Corps)
> intends to prepare an Environmental Impact Statement (EIS) to address
> the continued operations and maintenance of the Willamette Valley
> System (WVS) in accordance with authorized project purposes; while
> meeting Endangered Species Act (ESA) obligations to avoid jeopardizing
> the continued existence of listed species.
> The Corps will serve as the lead federal agency for purposes of the

National Environmental Policy Act (NEPA).

DATES: Written comments for consideration in the development of the scope of the NEPA EIS are due to the addresses below no later than June 28, 2019.

ADDRESSES: Mailed comments may be sent to: U.S. Army Corps of Engineers, Portland District, P.O. Box 2946, Attn: CENWP-PME-E, Portland, OR 97208-2946. Email comments to: willamette.eis@usace.army.mil. All comments and materials received, including names and addresses, will become part of the administrative record and may be released to the public.

FOR FURTHER INFORMATION CONTACT: For questions regarding the EIS, or special accommodations for scoping process participation, please contact Suzanne Hill, Environmental Resources Specialist, (503) 808-4767.

SUPPLEMENTARY INFORMATION:

Background. The WVS consists of 13 multipurpose dams and reservoirs, riverbank protection projects in the Willamette River Basin in Oregon, and hatchery programs to mitigate for effects of the project on fish habitat. The most recent NEPA evaluation for the overall WVS operations and maintenance was an EIS completed in 1980. Since 1980, operations have been modified and structural improvements for fish passage and temperature control have been implemented to address effects of the WVS on ESA-listed fish. NEPA evaluations since the 1980 EIS have been project-specific. There is also new information relevant to the environmental impacts of operating the WVS. This EIS will evaluate the impacts of continued operations and maintenance of the WVS. The EIS will be prepared in accordance with NEPA, the Council on Environmental Quality's (CEQ) NEPA regulations (40 CFR parts 1500-1508), and the Corps' NEPA regulations (33 CFR part 230). The Corps has reinitiated formal consultation under Section 7 of the ESA on the National Marine Fisheries Service's 2008 Biological Opinion for the Willamette River Basin Flood Control Project. This NEPA process will inform the ESA Section 7 consultation process. Additionally, the Corps intends to initiate consultation under Section 106 of the National Historic Preservation Act. The Corps anticipates that the draft EIS will be made available for public comment in Fall/Winter 2020.

The Corps has invited the following Tribes and federal and state agencies to participate as cooperating agencies for the EIS: Confederated Tribes of Warm Springs, Confederated Tribes of Grand Ronde, Confederated Tribes of Siletz Indians, Cow Creek Band of Umpqua Tribe of Indians, Bonneville Power Administration, U.S. Bureau of Land Management, National Marine Fisheries Service, U.S. Bureau of Reclamation, U.S. Forest Service, U.S. Fish and Wildlife Service, Oregon Department of Fish and Wildlife, Oregon Water Resources Department, Oregon Parks

[[Page 12238]]

and Recreation Department, Oregon Department of Environmental Quality, Oregon Department of Land Conservation and Development, Oregon Department of State Lands, and Oregon Department of Agriculture.

Alternatives. The EIS will evaluate a no action alternative and action alternatives. The no action alternative is the current management direction for the WVS. Action alternatives will be composed of various measures for continued operations and maintenance of the WVS, as well as measures that will be developed to meet ESA obligations to avoid jeopardizing the continued existence of listed species. Comments received during the scoping comment period will inform the development of action alternatives.

Scoping Process/Public Involvement. The Corps invites all affected federal, state, and local agencies, affected Native American Tribes, other interested parties, and the general public to participate in the NEPA process during development of the EIS. The purpose of the public

scoping process is to provide information to the public, narrow the scope of analysis to significant environmental issues, serve as a mechanism to solicit agency and public input on alternatives and issues of concern, and ensure full and open participation in scoping for the Draft EIS. Numerous public scoping meetings will be held during the scoping period. The specific dates, times, and locations of the meetings will be published on the Corps' project website: Blockedhttps://www.mwp.usace.army.mil/Locations/Willamette-Valley/Evaluation/.

This is not a notice for the public comment periods for the Cougar Downstream Passage and Detroit Downstream Passage projects; public comment periods for those projects will be noticed separately.

Documents and other important information related to the EIS will be available for review on the Corps' project website.

Aaron L. Dorf,
Colonel, Corps of Engineers, District Commander.
[FR Doc. 2019-06258 Filed 3-29-19; 8:45 am]
BILLING CODE 3720-58-P

June 20, 2019

To: U.S. Army Corps of Engineers
CENWP-PME-E
ATTN: Suzanne Hill
P.O. Box 2946
Portland, OR 97208-2946
email: willamette.eis@usace.army.mil

From: Yamhill Soil and Water Conservation District

Re: The Army Corps of Engineers request for comments in preparation of an Environmental Impact Statement, (EIS) on the Willamette River System.

ATTACTMENT: *Geomorphic Evaluation of the Ongoing Channel Processes Occurring at Lambert Bend, Yamhill County, Oregon* prepared by Lidstone and Associates dated May 2006

Dear Susan Hill, EIS Project leader Army Corps of Engineers:

Please accept and consider the following comments in the Army Corps of Engineers' (COE) preparation for the Environmental Impact Statement, (EIS) for the continued operations and maintenance of the Willamette Valley System.

Yamhill Soil and Water Conservation District (district) is very concerned about the lack of maintenance on the COE bank protection projects. These include, wing dams, revetments, bank barbs, etc. The lack of maintenance has resulted in the loss of farmland, bank and river capture in the Lambert Bend Area, RM 63 to 65. The floods of 1996, 1997, 1998 and subsequent years including April 2019, have caused significant river scouring, loss of bank protection, and massive amounts of debris lodged in this area. The access road to the farmland and adjacent areas are in jeopardy of being lost in the next flooding period.

Since the early 1980s the district has responded to requests from landowners to provide advice and help to prevent erosion damage on their farmland in this area. However, the scope and scale of the eroding river is way beyond the capabilities of the district.

It is evident even from a casual observation that future river flood events will create a new channel, possibly a main channel across the May's land on Lambert Bend. When this occurs, the river will endanger the downstream mining pits and area resulting in river capture and head cutting back upstream.

We have attached *a Geomorphic Evaluation of the ongoing channel Processes occurring at Lambert Bend Yamhill County, Oregon* prepared by Lidstone and Associates dated May 2006. The study was in response to a request from the Department of Geology and Mineral Industries (DOGAMI) Albany, Oregon who were concerned about the impacts of future flooding and new channels forming resulting in pit capture on the current mining operations in the general area of RM 61 and upstream.

Note pages 34 and 35, heading 10.0 about the high potential of significant river capture in this area. Page 35 paragraph two, the last three sentences: "Channel changes at Lambert Bend can initiate pit capture. There will be tremendous loss of farmland and it may also cause erosion and scour in the existing riparian areas. The conveyance capacity of the captured system will be grossly altered resulting in additional upstream and downstream impacts."

It is our opinion that approval of mining operations in the Willamette Valley Floodplains of Yamhill County weakens the structural integrity of the floodplains resulting in head cutting and eventual river capture destroying productive high value farmland that Yamhill County depends on to support its economy. The district would appreciate the COE's comments to address these concerns in future aggregate mining applications.

Please include our comments in the COE's preparation of the EIS and future plans of the "Continued Operations and Maintenance of the Willamette Valley System"

Respectfully,

Barbara Boyer

District Chair

GEOMORPHIC EVALUATION OF THE ONGOING CHANNEL PROCESSES OCCURRING AT LAMBERT BEND YAMHILL COUNTY, OREGON

Prepared for:

State of Oregon
Department of Geology and Mineral Industries
Albany, Oregon

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May 2006

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1.0 INTRODUCTION

Over the past 100 years, the Willamette River has changed from a braided channel covering large expanses of its valley floor to almost a single channel throughout its length. Human development of cities, agriculture, forestry and other industries have permanently altered the floodplains and upland areas. This development includes flood and erosion control activities, water supply, and navigation maintenance. Historical research concludes that "channelization" has occurred along the Willamette River since the mid 1800's. According to Benner, 1997, eighteen percent (18%) of the Willamette River channel bank has been stabilized between Eugene and the Newberg Pool above Oregon City Falls. The Army Corps of Engineers (Corps) under the River and Harbors Act, and the Eldridge Bar District Improvement Company constructed revetments along the Willamette River between Windsor Island (RM 75) and Canadian Bar (RM 58) beginning in 1938. Until the early 1970's, the Corps maintained a navigation channel (by dredging) as far upstream as Eugene. Dam construction along many of the tributaries was initiated around 1942 and was completed in 1969. Each of these activities has the potential to change the flow pattern and geomorphic behavior of the Willamette River. Of particular interest is the source of excessive sedimentation and the inherent possibility of a meander bend cutoff at Lambert Bend (RM 64.48).

As a member of the Lambert Bend Stakeholders Group (Stakeholers Group), Lidstone and Associates, Inc. (LA) of Fort Collins, Colorado volunteered to direct and assist in field data collection and geomorphic analysis of a potential river cutoff at Lambert Bend (RM 64). Currently, the Stakeholders Group consists of impacted and adjacent farm operators/landowners, floodplain mine owners, Yamhill County Commissioners, Yamhill County Soil Water Conservation District, Yamhill County Improvement District No. 1, USDA-NRCS, McMinnville, Oregon Department of Agriculture, and the Oregon Department of Geology and Mineral Industries (DOGAMI). The purpose of this analysis was to determine the direct and indirect cause(s) of the potential cutoff and the potential consequences, should this cutoff occur. LA recognizes that natural channel changes are an inherent part of all river systems, but in some cases human actions either accelerate the rate of change or are causal by themselves. The distinction between a natural and human-induced change at Lambert Bend is important. It is not the Stakeholders Group's mantra to "control nature," but rather to work within the boundaries of river and floodplain processes to mitigate existing and predictable human-induced impacts and to avoid catastrophic impacts to the channel and floodplain. The data collection program and this geomorphic analysis were developed primarily to determine the source and cause of the Lambert Bend cutoff. A secondary work effort associated with the initial baseline data collection was to determine the upstream and downstream impacts of the impending cutoff and provide baseline data (topographic and hydraulic) to accommodate final engineering/geomorphic design of potential solutions to help the river more or less maintain its current course or accommodate the impending river channel change. Finally this work also included a brain storming effort to address secondary benefits (biological, environmental and channel complexity) of alternate geomorphic solutions to the Lambert Bend cutoff.

In July 2005, members of the Stakeholders Group and other volunteers, led by Frank Schnitzer, DOGAMI, met in Dayton, Oregon to begin data collection. The reach of interest extended from Windsor Island (RM 75), through Grand Island (RM 67), through Lambert Bend (RM 64) to Weston Bend (RM 60) and is depicted on **Figure 1**. Based on this data collection effort and

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direct assistance from DOGAMI, LA completed a geomorphic analysis of a reach of the Willamette River to evaluate changes in the river's course through time. Much of the critical reach of interest and its subject of investigation, the Lambert Bend cutoff, lies within Yamhill County, Oregon. The purpose of this geomorphic analysis is to determine the cause of the potential meander cutoff near Lambert Bend and the potential impact to floodplain mines at Weston Bend. Assessment results will aid in the development of a plan to rehabilitate this reach of the river. This analysis consists of the following six components, each of which will be discussed in detail in Sections 2 through 6.

- Geologic Analysis
- Hydrologic Analysis
- Geomorphic Analysis
- Fish Habitat Analysis
- Description of Floodplain Mines at Weston Bend
- Field Verification

LA would like to acknowledge the work efforts of all of the Stakeholder Group, but in particular those who participated in the data collection. Marc Norton and Lloyd Van Gordan of Water Resources Department; Frank Schnitzer, Dawn Marshall and Vaughn Balzer of DOGAMI; Bud Stone of Gladstone, Oregon; Joe and Tom Bernert of Joe Bernert Towing; Todd Baker of Baker Rock; George Adams of Wilsonville Concrete; Dr. John Heiser, a local landowner; Chip Andrus, fish habitat specialist of Adolfson Associates; Kathy George, Yamhill County Commissioner; and, Edgar Peteros, Bob Gilson and Steve Rodewald of the Yamhill County Engineering and Survey Department. LA would also like to acknowledge assistance from Chip Andrus for the development of the Fish Habitat Analysis section.

2.0 GEOLOGIC ANALYSIS

Local geology was reviewed to identify geologic controls that may govern or restrict changes in river pattern near Lambert Bend. Site reconnaissance by LA indicated the cliff forming Willamette Silt Formation, near Feasters Rocks, prevents eastward migration of the Willamette River downstream of Lambert Bend. The remainder of the reach is composed of Pleistocene and Holocene floodplain deposits.

The Willamette Silt is composed primarily of quartz, feldspar, mica, clay and fine sand sediments. These sediment deposits are faintly bedded, with individual beds ranging in thickness from 6 to 14 inches (Allison, 1953; Glenn, 1965). The sediments contain glacial erratics ranging in size from pebbles to boulders (Allison, 1935, 1953). In the central Willamette Valley, the Willamette Silt has a maximum thickness of about 130 feet and forms distinct outcrops in areas like Fairfield Bar and Feasters Rocks.

Following deposition of the Willamette Silt, the last of the Pleistocene sand and gravel unit was deposited. This unit was deposited in broad swaths along the Willamette River by major braid plain stream tributaries exiting the Cascade Range. The surface morphologies and internal stratigraphy of multiple, shallow channels indicate that Pleistocene sand and gravel deposits were formed during periods of channel instability, high sediment supply, and sediment load consisting primarily of bedload (Orr, 1964). The unit is between 15 and 60 feet thick.

The Pleistocene braided river systems that formed these extensive braid plains of sand and gravel evolved into the meandering river channel that is forming today's gravel bars and silt-covered floodplains. The sand and gravel of today's modern river is approximately 20 to 50 feet thick and sits on a cohesive deposit of the Willamette Silt. The current single thread meandering stream is a product of the last 100 years of human-induced alterations to control the river. As the river is confined within its modern banks, entrenchment and redistribution of its bed and bank sediments appears to dominate the geomorphic process.

3.0 HYDROLOGIC ANALYSIS

The nearest Willamette River U.S. Geological Survey (USGS) gaging station is located 18 miles upstream from Lambert Bend at Salem, Oregon (USGS Gage ID 14191000). The drainage area for the Salem Gage is 7,280 square miles, compared to the drainage area at the site location of 7,490 square miles. Because the drainage area difference between Lambert Bend and the Salem Gage was relatively small (3%), no adjustments were made for the discharge values at the Salem Gage.

Using techniques described in Schulz, 1976, LA performed a Log Pearson Type III analysis on the peak flow data for the Salem Gage to characterize pre-dam (1942) flows on the Willamette River. To perform the analysis, LA used the DOS-Based Computer Program "Pearson," to determine the discharge for events with various return periods. The post-dam (1969) analysis of peak flow data was prepared by the USGS. Analysis results for the two periods are presented in **Table 1**.

Table 1, Flows for Various Return Periods

Flood Event Return Period	Pre-dam (1942) Construction Discharge (cfs)	Post-dam (1969-2001) Construction Discharge (cfs)
2-Year	166,322	74,500
5-Year	247,853	114,000
10-Year	309,703	160,000
25-Year	397,688	214,000
50-Year	471,544	224,000
100-Year	459,453	253,000

In 1942, flows at the Salem Gage began to be influenced by construction and closure of one dam. Subsequent to 1942, nine more dams were placed on tributaries of the Willamette River with final construction ending in 1969. These dams primarily served to reduce the larger peak flows moving through the system. The Log Pearson Type III analysis of the two periods indicates there is a distinct difference in peak flows between pre- and post-dam construction. Evaluation of the mean annual flow data for each period indicates that dam construction has increased the mean annual flow from 21,000 cubic feet per second (cfs) to 24,000 cfs. The changes in flow regime are expected because dams typically create a more balanced regime. Peak flows become dampened to reduce flooding impacts while more water is made available

during the summer for irrigation purposes. USGS average annual stream flow and peak flow data are presented in **Appendix A**.

Changes in the flow regime can have a distinct impact on channel morphology. To remain "stable'" all rivers and streams seek to establish and maintain a balance between discharge and sediment transport. Lane (1955) postulated the following relationship:

(3.1) $Q_w S \sim Q_s D_{50,}$ where

Q_w is stream discharge, S is channel slope, Q_s is sediment discharge and D_{50} is the median size of the stream sediments

Following the passage of an extreme discharge event, an alluvial channel will adjust its channel morphology, including channel geometry. The river system will remain out of balance for a period of time until some new level of equilibrium can be established. Considering the Willamette River system as a whole, in terms of discharge, the dams have leveled out the flow regime. In theory, when only discharge is considered, this should minimize the amount of change in channel morphology through time.

When sediment transport is added to the equation, the dams' influence on channel morphology is seen as much greater. In the case of the Willamette River system, not all tributaries have dams. Sediment from these unregulated tributaries is deposited in the main stem of the Willamette River on an episodic basis - typically following heavy winter rains, mass wasting and landslides in the steep upper tributaries. With an overall reduction in peak discharge (due to dam regulation), these "slugs" of sediment are no longer flushed through the system in the relatively consistent manner that they were prior to regulation. Sediment is typically transported from "reach to reach" in response to local changes in channel gradient. Generally, sediment deposition causes local oversteepening of the channel gradient (increase in S, Eqn. 3.1), local acceleration of the flow, and bed degradation - headcut migration in an upstream direction. This generally results in a lowering of the average bed elevation and sediment production. In other words, as channel slope (S) increases, either sediment discharge (Q_s) will increase or the median size of the bed material (D_{50} of the armor layer) will coarsen.

The following equation describes an aggradational or depositional system

(3.2) $Q_s > \tau_o V$:,

Where Q_s is sediment discharge, τ_o is tractive force or the product of the unit weight of water (γ), depth of water (d) and channel slope (S) and V is the stream's velocity.

The product of tractive force and velocity is stream power and where sediment discharge exceeds stream power, sediment deposition will occur. As the sand and gravel bars become excessive in size, vegetation begins to stabilize the bar and this bar becomes a permanent feature within the active channel. This bar will ultimately force the channel to meander, locally decrease the channel slope, increase local channel sinuosity and induce additional deposition (decrease in sediment discharge (Q_s)). Eventually the new meandering system will result in opposite bank erosion, thereby imparting additional sediment, albeit finer into the fluvial system.

Channel cutoffs and channel realignment will also significantly affect channel slope and sediment production. In returning to Lane's Equation (eqn. 3.1), a channel cutoff will shorten the channel length and thereby increase channel slope at Windsor Island, over 2,000 feet (28%) of its channel length was "cut off" by channel straightening. This local increase in channel slope resulted in a significant increase in sediment production and overall channel bed degradation.

Changes in channel morphology are not restricted to channel incision, but may include channel widening, increase in channel sinuosity (bank erosion) and bed aggradation. The system and its behavior become even more complicated when bank revetment works and channel grade controls don't permit natural channel response. For example, where a meandering river encounters lengthy bank revetment works, the system becomes more hydraulically efficient and may carry sediment produced from an upstream source a far greater distance than predicted until local conditions are such that deposition occurs. This activity can be seen at Lambert Bend where the upstream reaches are well protected by civil works and source material is still generated from the channel straightening at Windsor Island. Further discussion of the extension of the Lambert Bend meander as it relates to changes in hydrology and other factors will be discussed in the following sections.

4.0 GEOMORPHIC ANALYSIS

In order to address the objectives of the work effort, LA conducted a geomorphic analysis of the project area. The analysis consisted of three parts: (1) a historical bankline analysis to characterize changes in plan form over a length of historical record (67 years); (2) a longitudinal profile and cross-section analysis to characterize vertical changes both at-a-station and along a continuum (23 years); and (3) a sediment analysis, which addresses the characterization of the depositional system on a temporal basis (short term).

To perform the historical bankline analysis, aerial photographs of the Willamette River were obtained from the University of Oregon – Knight Library Document Center, DOGAMI, and the Corps. The photos depict the planimetric changes of the river between 1936 and 2003. The following aerial photographs were reviewed as part of this analysis: 1936, 1944, 1947, 1948, 1955, 1963, 1970, 1979, 1980, 1994, and 2003. LA's geomorphic interpretation of bankline changes recognized that each aerial photograph varied on the basis of scale and quality. As is true with all photogrammetric bankline studies consideration must be made for the variations in discharge (water line) at the time of the photograph, variability in scale, and the distortion at the edge of the photographs. Quantification of actual bankline changes and the erosion rates of channel banks is not very accurate due to these sources of variability.

In order to complete the historical analysis of river cross sections, LA, with the help of the Stakeholders Group identified the approximate location of the 1982 Federal Emergency Management Agency (FEMA) HEC-2 model cross sections in the field. The right and left banks of each cross section were staked in the field and a surveying effort was undertaken by combining topographic methods conducted by the Yamhill County Surveyors and bathymetric methods by Joe Bernert. Seven river cross sections were measured between RM 60.82 and 66.32 in July 2005. Additional cross section data are available in LA's files from the Palisades Ranch and Grand Island Permit to Mine applications. Joe Bernert and LA personnel completed a centerline profile survey (and geomorphic observations) between RM 59.96 and 67.63. **Figure**

1 illustrates the location of the HEC-2 cross-sections used in the analysis as well as areas where bank revetment has been constructed.

Finally, the sediment data collection program included both field measurements of the surface gravel armor (using the Wolman Count method) and bag samples of sub-armor samples. These latter samples were collected in the field and delivered to Wilsonville Concrete for textural analysis - both fine and coarse texture. LA completed a statistical analysis of sediment texture to support the evaluation related to the conditions and timing of sediment transport.

4.1 Historical Bankline Analysis

*Please note that in the subsequent Geomorphic Analysis discussion the following nomenclature is used. The **Right Bank** (RB) is the east bank or the right bank of the channel, looking downstream. The **Left Bank** (LB) is the west bank or the left bank of the channel, looking downstream.*

For the purpose of this analysis, LA subdivided the project area into seven sub-reaches based upon the relative bankline changes at a given location. For example, some locations had very little change with time while others exhibited significant change, such as a meander cutoff. Locations where a similar degree of activity occurred were grouped together to form a sub-reach. **Figure 1** shows bank revetment locations and river miles for the Willamette River study reach. Specifically, the respective sub-reaches are identified as follows:

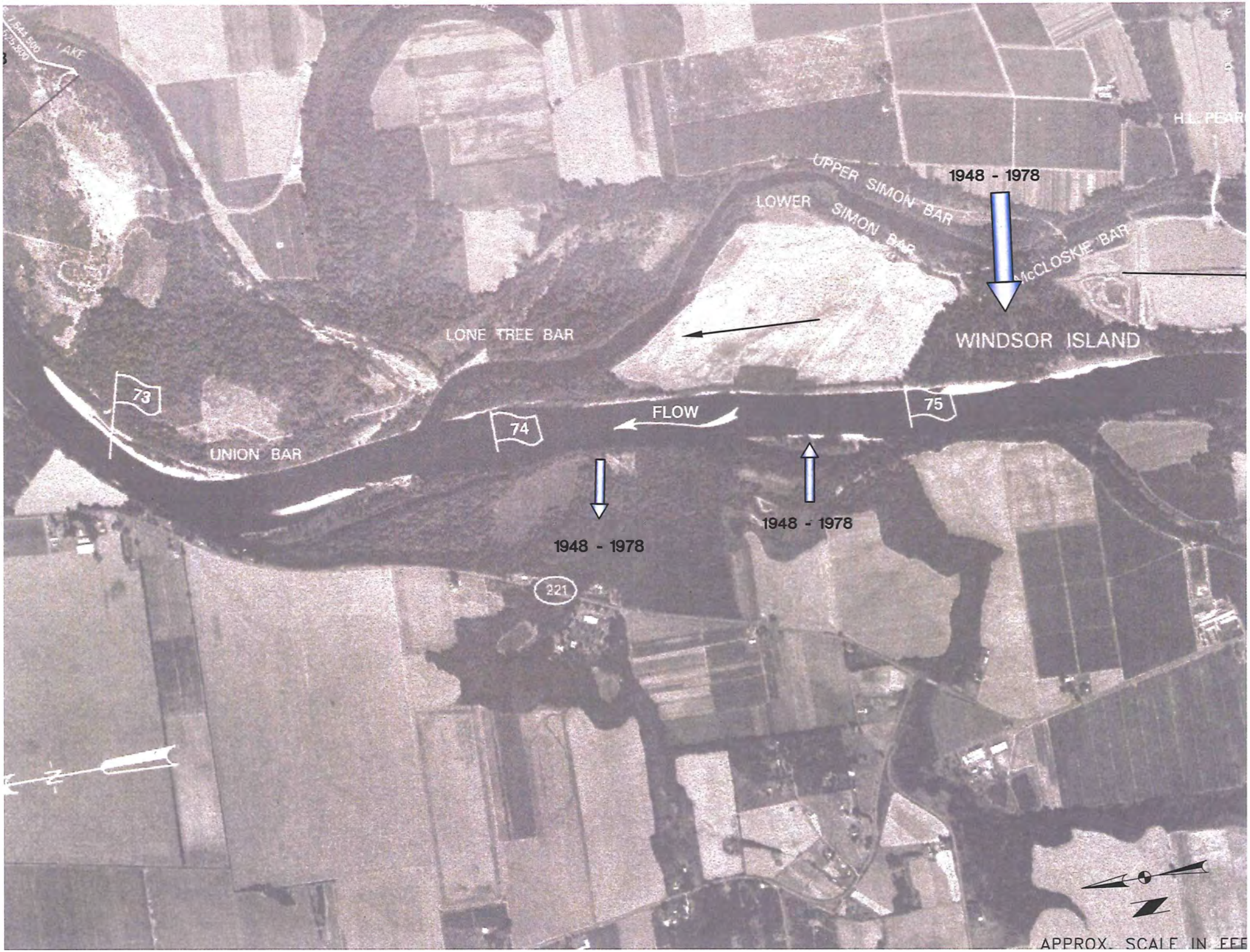
Sub-reach A: RM 78.5 to RM 74
Sub-reach B: RM 74 to RM 70
Sub-reach C: RM 70 to RM 68
Sub-reach D: RM 68 to RM 67
Sub-reach E: RM 67 to RM 65
Sub-reach F: RM 65 to RM 63.8
Sub-reach G: RM 63.8 to RM 60

The following paragraphs discuss specific historical changes and geomorphic trends. To simplify the presentation, arrows indicating historical movement identify geomorphic trends. At each location, the period of time represented by the "movement" is presented on **Figures 2 through 5**. Although the following sections address channel changes on a sub-reach by sub-reach basis, these changes are linked together as a continuum of change within the Willamette River system. There is a cause and effect linkage, which must be first understood before self-sustaining solutions can be developed

4.1.1 Sub-reach A (RM 78.5 -74)

Sub-reach A is located at the upstream end of the study area, which begins at RM 78.5 and extends downstream to Lone Tree Bar (RM 74). This reach has been one of the most geomorphically active reaches and includes the Windsor Island Cutoff. The upper portion of this reach is not included in **Figure 2**.

Darrow Bar, situated against the LB near RM 78, started out as an average size gravel bar (1,000 feet). Between 1936 and 1994, Darrow Bar has grown substantially and has prograded


LAKE
UPPER SIMON BAR
LOWER SIMON BAR
McCLOSKIE BAR
1948 - 1978
LONE TREE BAR
WINDSOR ISLAND
73
74
75
FLOW
UNION BAR
1948 - 1978
1948 - 1978
221
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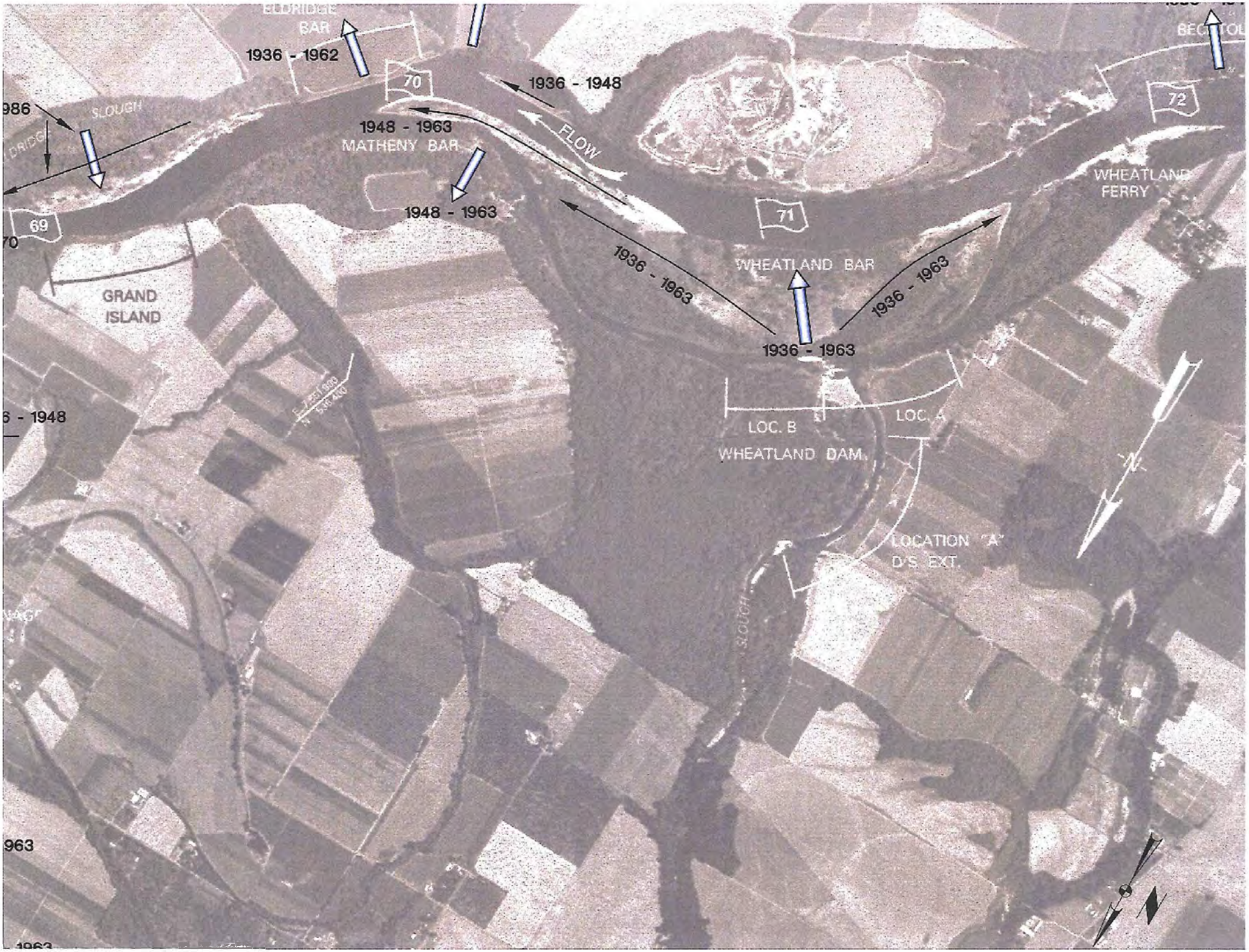
upstream and downstream approximately 2,000 feet. Downstream of Darrow Bar near RM 77, a similar process has taken place along the LB. An isolated gravel bar across from Spongs Bar has grown from a small isolated gravel bar in 1936 to a large, substantial feature averaging 4,000 feet in length by 1994. During this process, the gravel bar eventually migrated downstream to join the LB creating less meander and straightening the channel. A small channel is maintained between the gravel bar and the LB during higher flows.

Within Sub-reach A, the majority of channel changes occurred between RM 76.5 and 74. In 1936, the Willamette River was a braided system with the majority of flow passing through the east channel near Lower Simon Bar, McCloskie Bar, and Windsor Island. Sometime between 1936 and 1948, channel geomorphology started to change and more flow entered the west channel. The Corps began dredging this reach in the 1940's and records indicate substantial material removal during the 1960's and 1970's. Dredge spoils were placed off channel as part of the dredging operations and may have served as a plug along the east channel. Dredging by the Corps ceased in 1975. Mining began at Windsor Island sometime in the early 1960's and a haul road and bridge were constructed over the east channel. The mine pits were diked and therefore isolated from the channel during all but higher flows. Between 1948 and 1978, LA observed continually less flow along the east channel and more flow and channel straightening along the west channel. Over time, the original string of islands (Simon, McCloskie and Windsor) became the RB of the river's main stem. Since 1978 a single side channel (slough) is present along the eastern edge of the islands and the main stem of the Willamette River passes through an unusually straight course west of Windsor Island and Lower Simon Bar (**Figure 2**). The abandonment of the east channel, realignment and straightening of the west channel through this portion of the sub-reach resulted in a channel length reduction of approximately 2,000 feet.

Since the cutoff was completed, channel bed degradation has occurred and provides an ongoing source of sediment for downstream reaches. There has been no significant lateral movement since 1978 though continued degradation of the west channel appears to be taking place. This degradation is related to (1) the original dredging and channel straightening activities of the Corps; (2) confinement of the main channel by the levees surrounding Windsor Island; and (3) the sediment poor (hungry) water originating from the upstream reach (RM 78.5 to 76.5). The bar build-up of this upstream reach (Darrow Bar and Spongs Bar) may have accelerated sediment production (channel degradation) from the Windsor Island Cutoff. Additional evidence of channel degradation at the Windsor Island Cutoff is the repair work and annual inspections of the Northwest Natural Gas pipeline at RM 75.55. Annual inspections by divers find evidence of continued scour and bedload transport. The most recent repairs to re-cover the pipeline under the channel bed were completed in 2000 along the RB. Concrete blocks were anchored in place by drilling into the channel bed. Earlier repairs reportedly occurred on the LB (Cliff Coulter, Northwest Natural Gas, personal communication, January 2006).

4.1.2 Sub-reach B (RM 74 - 70)

Sub-reach B begins at RM 74 and extends down to Matheny Bar at RM 70 (**Figures 2 and 3**). The majority of change within this sub-reach has occurred between RM 71.8 and 70. Between 1936 and 1948, a small amount of erosion was observed along the RB near RM 72. The Corps placed a bank revetment at this location in 1948 to prevent further erosion. After 1948, no erosion was observed at this location.


1936 - 1962
70
1936 - 1948
1948 - 1963
MATHENY BAR
FLOW
72
69
71
GRAND
ISLAND
WHEATLAND BAR
1936 - 1963
1936 - 1963
1936 - 1963
WHEATLAND
FERRY
LOC. B
LOC. A
WHEATLAND DAM
LOCATION "A"
D/S EXT.
SLOUGH

The major change in this sub-reach occurred at Wheatland Bar. In 1936, the west edge of Wheatland Bar served as the right bank of the main channel. The 1948 photo shows a channel along the east edge of Wheatland Bar. Based on the distribution and accumulation of sediment along the east channel's right bank, it appears that this channel was dredged, probably to facilitate navigation. As the east or "new" channel assumed more direct flow, it began to widen, deepen and ultimately became the primary channel. Dredging of Wheatland Bar continued through the 1970's as the Corps attempted to maintain a navigational channel through this reach.

At the same time, development of the east channel was occurring, Wheatland Bar expanded to the southwest and east. Vegetation encroached on the deposited sediments and stabilized the bar as it continued to grow. A small channel still exists along the west side of Wheatland Bar today. The realignment and straightening of this portion of the sub-reach resulted in a channel length reduction of approximately 1,500 feet.

Additional, yet more subtle changes can be seen at Wheatland, Matheny and Eldridge Bar(RM 71 to 70). Between 1936 and 1948, small amounts of erosion occurred along the RB between RM 70.2 and 69.9 followed by the formation of a gravel bar in the same area. The formation of this gravel bar appears to have stopped future erosion. Between 1948 and 1963, erosion of Matheny Bar was observed. Contemporaneous to the erosion of Matheny Bar, Wheatland Bar migrated eastward at RM 70. The extension of Wheatland Bar directed flows against the RB at Eldridge Bar causing bank erosion. By 1962, a bank revetment was placed at Eldridge Bar to protect against further erosion.

4.1.3 Sub-reach C (RM 70 - 68)

Sub-reach C begins at RM 70 and extends downstream to the upstream end of Snaggy Bend Bar at RM 68 (**Figure 3**). LA identified minor changes in channel alignment and width within this reach. In 1938 the Corps established the Ditmar Bend bank revetment along the RB (RM 68.9 – 68). This bank revetment prevented future meander migration to the east. Between 1936 and 1948 Ditmar Bar (LB at RM 68.3) became silted in and no longer conveyed flows, channelizing this stretch of the river. Between 1948 and 1986, the RB gravel bar, from RM 69.6 to 68.8, expanded toward the north and east. Through time this depositional area has become vegetated and, ultimately, relatively stable. Bar stabilization combined with the Ditmar bank revetment has resulted in river flow being directed at the LB in the vicinity of Tompkins Bar (RM 69.1 – 68.8). This shift in flow alignment removed a portion of Tompkins Bar between 1963 and 1970, creating an island.

4.1.4 Sub-reach D (RM 68 – 67)

Sub-reach D is located between RM 68 and 67 (**Figure 3**). Between 1936 and 1963, minor degradation of the gravel bar occurred along the RB between RM 68 and RM 67.7. Just downstream of this point, the RB gravel bar prograded to the north. Over time, vegetation has become established and there has been no change in the alignment of the right bank. Coinciding with changes to the RB, erosion to the LB at Alison Bar (RM 67.6 – 67) has occurred. Together, the erosion and deposition processes have resulted in a slight shift of the channel from east to west, straightening this reach of the Willamette River. A comparison of the 1963 and 2003 aerial photos revealed almost identical channel alignments and width, indicating that the channel in this reach has been relatively stable for approximately 40 years.

4.1.5 Sub-reach E (RM 67 – 65)

From 1936 to 1963, the LB at RM 66.9 prograded slightly to the north and over time has become stabilized through the establishment of vegetation. Since 1963, the bar ceased to grow at this location. Minor bankline recession occurred along the LB between RM 65.6 and 66. The Corps placed a bank revetment along this reach in 1952 to prevent further erosion.

Between 1963 and 1970, bankline recession occurred near the upstream end of the 1952 bank revetment at RM 66.1. An extension to the previously described revetment was constructed in 1972 and since that time no further erosion was noted in the subsequent aerial photos. The remaining change noted in the photographic record was the development of a bar near RM 65.3, sometime between 1980 and 1994, which is visible on **Figure 4**.

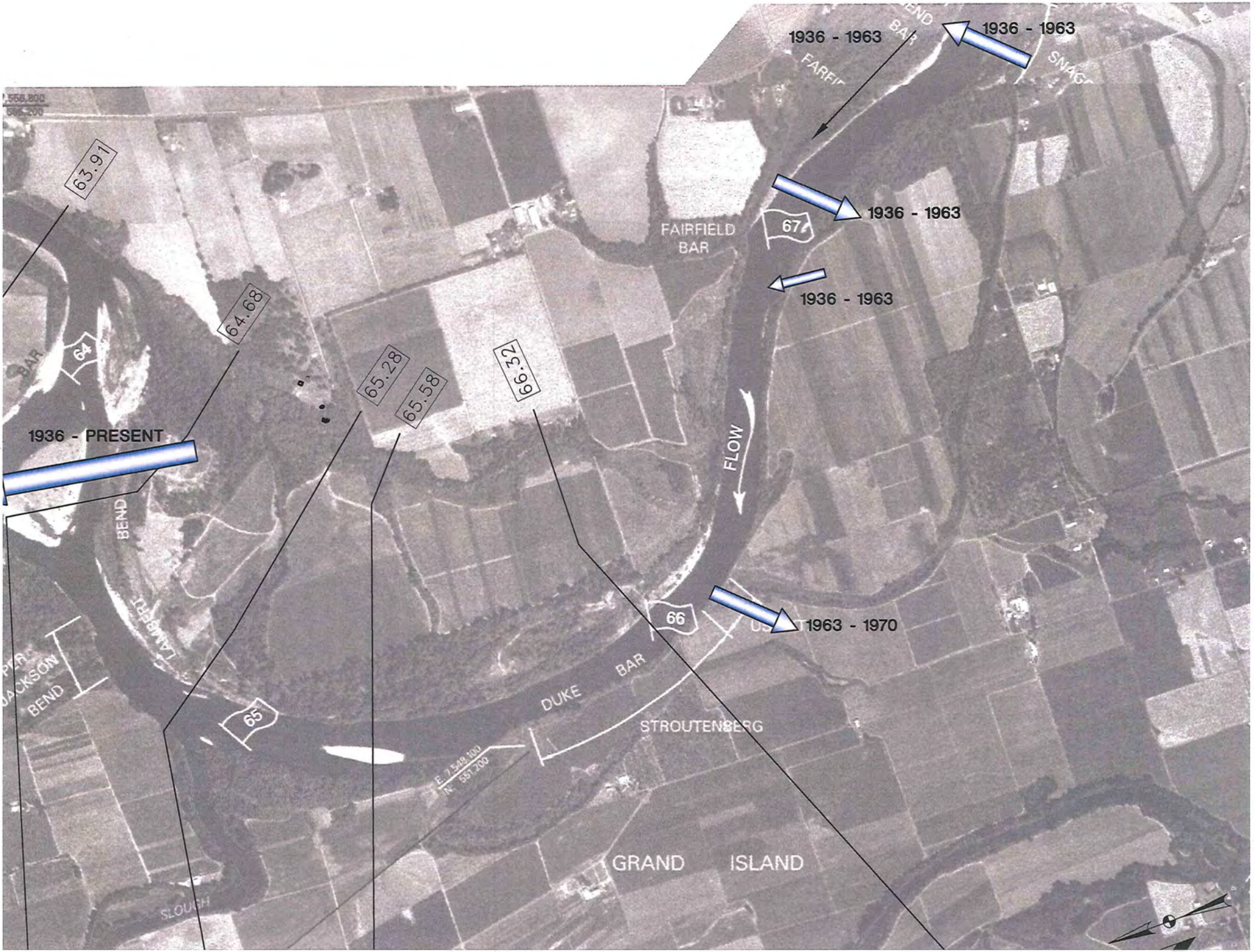
Although this sub-reach has been geomorphically inactive during the aerial photograph period of record, significant changes occurred prior to 1938. An abandoned meander exists on the LB floodplain between RM 67.8 and 66.3. At one time, this meander may have continued across the existing channel, on to the RB floodplain and extended to just upstream of Feasters Rocks. The existing slough on the RB floodplain was likely connected to the abandoned meander on the LB.

4.1.6 Sub-reach F (RM 65 to 63.8)

This sub-reach has been one of the most geomorphically active within the study area for the aerial photo period of record and is the principal area of concern. The historic Marion/Yamhill County line was surveyed along the centerline of the Willamette River channel. Throughout most of the study area the historic county line still approximates the existing main channel. However, within this sub-reach significant differences exist.

At the time the county boundaries were established, the Willamette River channel formed a sharp meander bend near RM 64.4. By 1936, the river had partially cut off this meander, forming an island just upstream of RM 64. Significant sedimentation occurred adjacent to the island, which ultimately closed off the island and formed a point bar. Since 1936, the point bar has prograded into the main channel, forcing more flow onto the LB (**Figure 4**). Since 1995, this gravel bar at Lambert Bend has accelerated in growth and exceeds 15 feet in height. The existing main channel is now northeast of the pre-1936 channel and has aggraded significantly.

The 1936 photo shows spur dikes on the LB at RM 64. Despite the dikes, the channel migrated northeastward and has created a meander bend with a very tight radius of curvature. The dikes and Corps authorized maintenance dredging were effective for the short term based on the nominal rate of bankline change from 1936 to 1968. Maintenance dredging ceased in 1975. LB erosion began soon after dredging stopped. By 1968 the Corps designed and built the Finnicum Dike to address this erosion at RM 64.25. Although the Corps was the lead agency in this project, additional funding support was obtained from the Yamhill County Soil and Water Conservation District, the Soil Conservation Service and the Oregon Department of Agriculture. A 400 foot-long revetment built with quarry crusher waste and faced with stone was placed with a 3 foot by 3 foot toe in the channel bed. The toe has eroded away and the structure is being undermined. The structure blocked an overflow channel and has successfully protected the tip of the Lambert Bend meander from developing a cutoff. However, the Finnicum structure moved the cutoff location upstream to the neck of the meander at RM 64.4.


1936 - 1963
1936 - 1963
1936 - 1963
1936 - 1963
1936 - PRESENT
1963 - 1970
63.91
64.68
65.28
65.58
66.32
64
65
66
67
FAIRFIELD BAR
FLOW
BEND
DUKE BAR
STROUTENBERG
GRAND ISLAND
SLOUGH

From 1968 to 2005, the rate of channel migration in a northeastward direction significantly increased. Over the last 20 years, the increasingly more direct impingement of stream flow onto the left bank and the associated hydraulic conditions has resulted in severe erosion. Increased deposition in the immediate area of Lambert Bend has resulted in overbank flooding at more frequent intervals. Seasonal flood events have inundated topographically low areas within Lambert Bend. Area inundation has initiated the formation of a large headcut, extending southward from RM 62.2. This headcut has moved nearly 1,000 feet and if allowed to develop further will result in the eventual cutoff of Lambert Bend. The impact of this "cut-off" will be described in later sections.

4.1.7 Sub-reach G (RM 63.8 to 60)

This reach appears to have remained relatively stable during the period covered by the aerial photography. Subtle changes appear to be the result of erosion at Lambert Bend (Sub-reach F).

Bedrock control at Feasters Rocks (RM 63) prevented channel movement along the right or outside bank of the meander. The inside of the bend experienced minor amounts of deposition and an increase in vegetative cover. Abandoned meander scars, which indicate historical channel movement, are visible in the photographs but the majority of movement occurred pre-1936 with the exception of the area west of Five Islands and Coffee Island bars

Beginning in 1955, noticeable sedimentation started to affect several features between RM 62.8 and 60.6 (**Figure 5**). Increased amounts of deposition were noticed along the west side of Five Islands (RM 62), the northeast side of Five Islands Bar (RM 61.6), and resulted in the elongation of Coffee Island. Some of the deposition is related to the instream disposal of dredged materials by the Corps. Conversely, this deposition created minor amounts of erosion on the opposite banks due to the impingement of flow in these areas. Erosion was observed along the southeast side of Five Islands Bar (RM 62) and across from Coffee Island between RM 61.3 and 60.6. Additional erosion was observed along the RB at RM 60.6, downstream from Coffee Island, just upstream from the Weston Bend Bank Revetment.

Since 1936, Weston Bend has been fixed keeping it from migrating any further north. In contrast, Weston Bar (LB near RM 60), has evolved from several islands to a single consistent gravel bar that has migrated north into the channel. Since 2000, the Weston Bar has been stable.

4.2 Longitudinal Profile and Cross-Section Analysis

In July 2005, Yamhill County and Joe Bernert surveyed the centerline of the Willamette River from RM 67.63 to RM 59.96 and seven cross sections, under the direction of LA. The cross sections were surveyed between RM 66.32 and 60.82 and replicated the 1982 FEMA cross section locations. Data were downloaded, rectified and adjusted to a similar survey datum used in the 1982 FEMA study to provide a reasonable comparison of the changes in bed elevation over a 23 year period.

Figure 6 provides a comparison between the 1982 and 2005 average channel bed elevations. To facilitate a reasonable comparison, the average channel bed was calculated at seven cross sections between RM 66.32 and 60.82 and the distance between each cross section was interpolated. **Figure 7** compares the 1982 minimum channel bed elevation (from FEMA cross

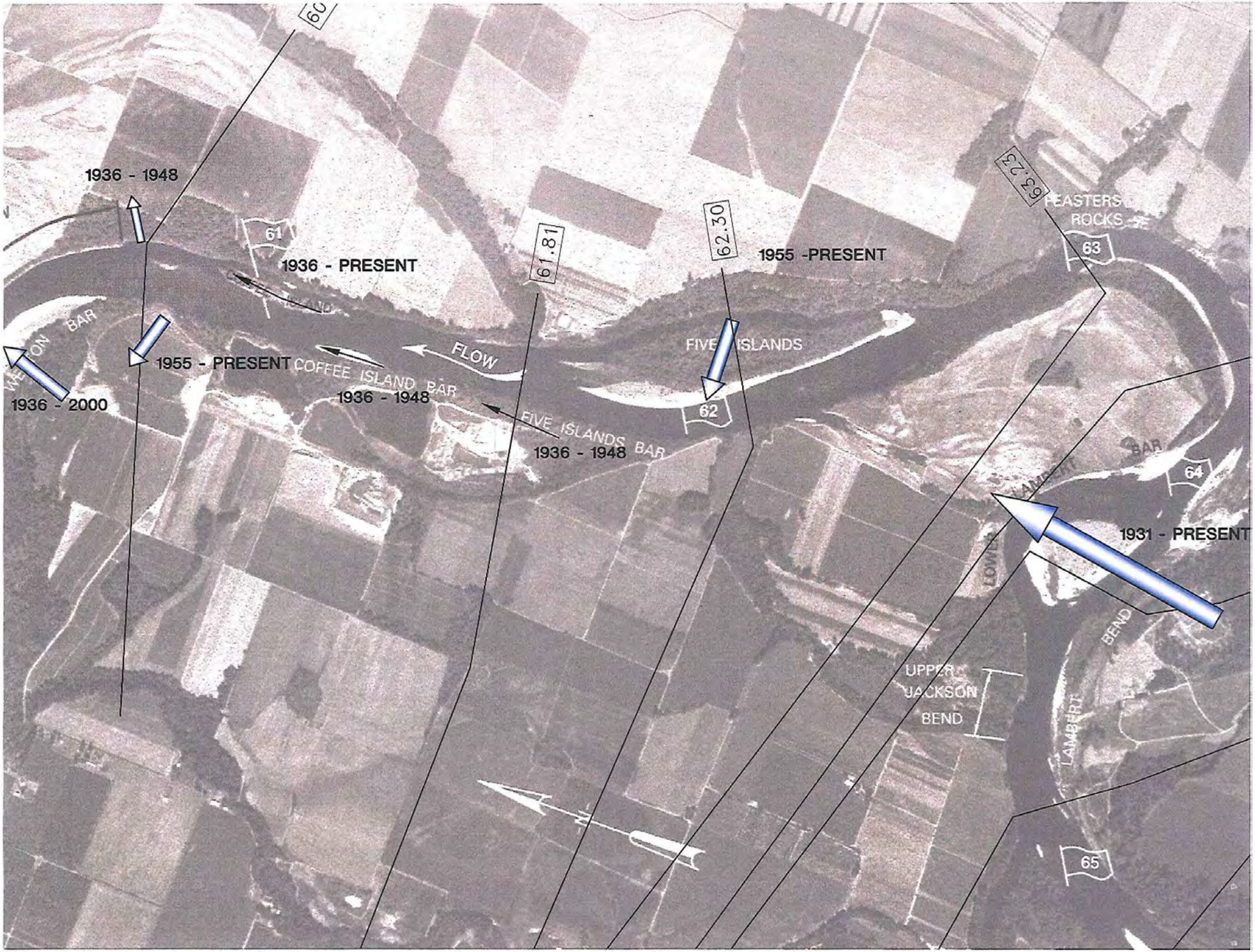

1936 - 1948
1936 - PRESENT
1955 - PRESENT
1936 - 2000
1955 -PRESENT
1931 - PRESENT
FLOW
COFFEE ISLAND BAR
1936 - 1948
FIVE ISLANDS BAR
1936 - 1948
FIVE ISLANDS
FEASTERS ROCKS
UPPER JACKSON BEND
LOWER LAMBERT BEND
LAMBERT BAR
61.81
62.30
63.25
61
62
63
64
65

Figure 6

Average Channel Bed Elevation Comparison

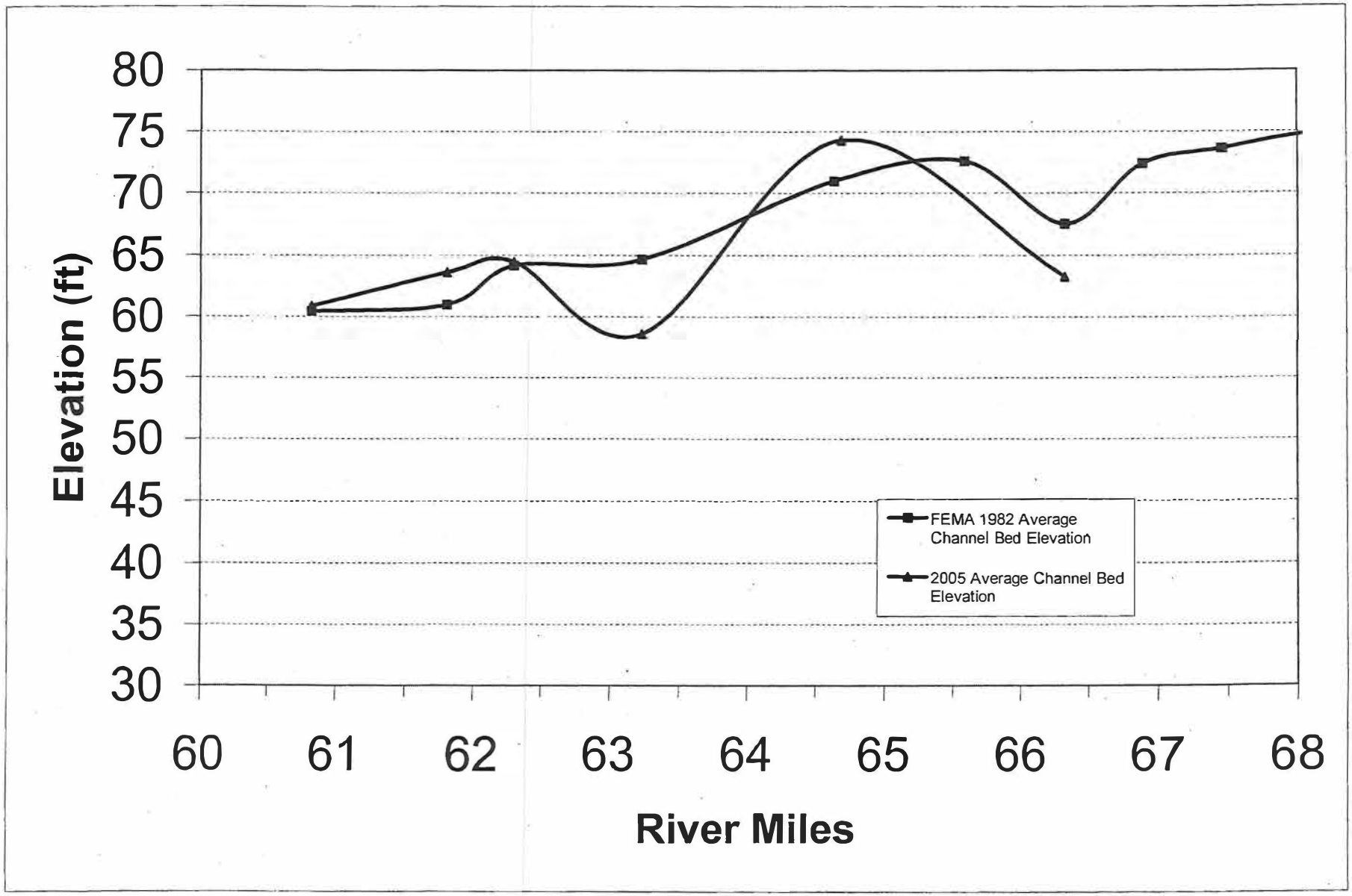
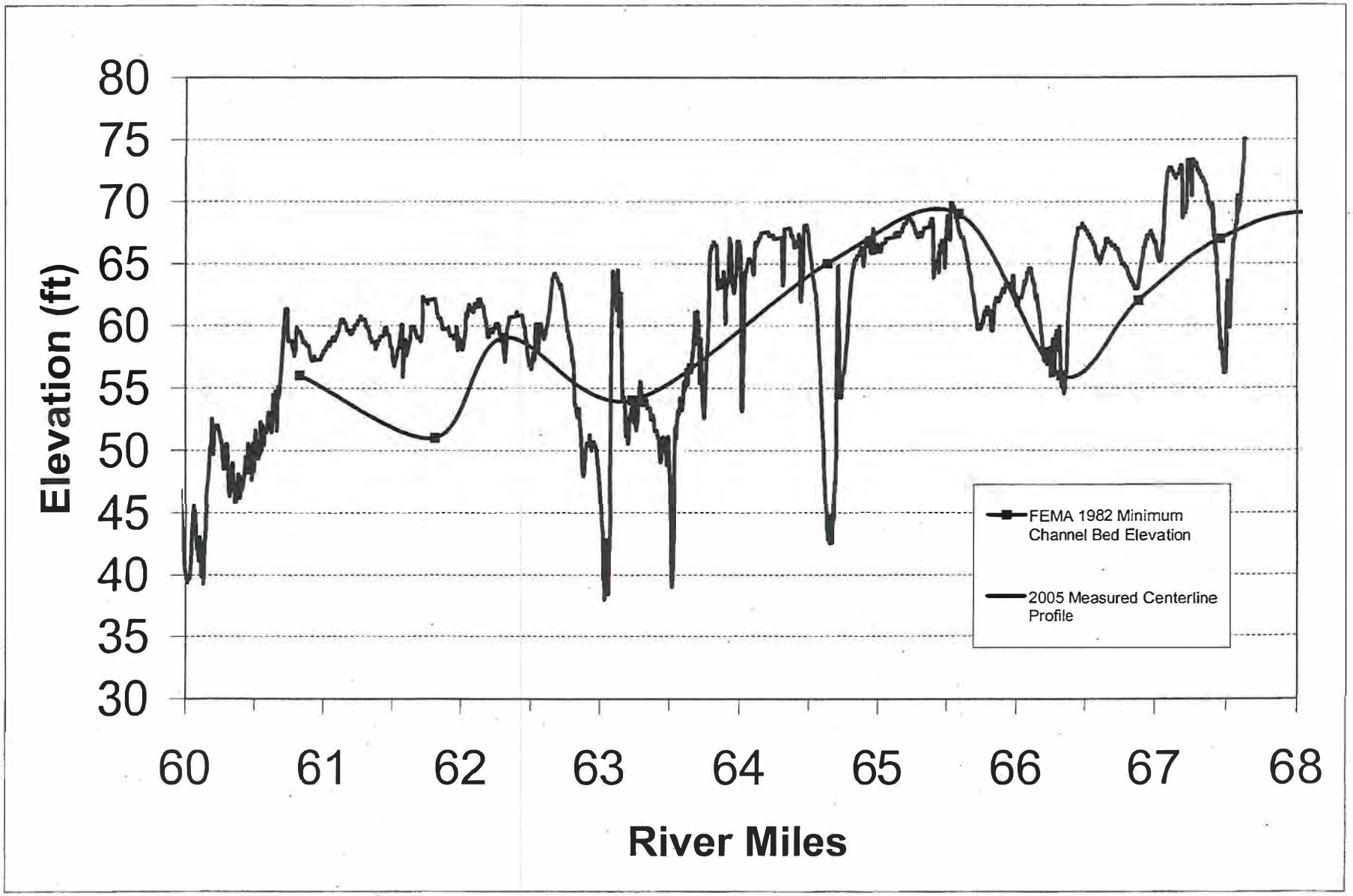


Figure 7

Willamette River Profile Comparison



section data) versus a continuously measured 2005 centerline profile. The **Figure 7** comparison begins at RM 67.6 and continues downstream to RM 60.82. Both figures roughly demonstrate similar river behavior over a period of 23 years. These data can be summarized as follows:

- aggradation from RM 67.6 to 66.3;
- slight degradation to minimal change (except local scour) from RM 66.3 to 64.8;
- significant aggradation within the Lambert Bend reach, RM 64.8 to 63.7;
- degradation between RM 63.7 to 62.5; and,
- general aggradation from 62.5 to 60.8.

When comparing the profile data to the changes in plan form (comparison of bank line analysis), an interesting picture arises. Upstream aggradation (bar development and progradation) was identified along Snaggy Bend, Tompkins Bar, Matheny Bar and Wheatland Bar (RM 68-71). This aggradation likely continued downstream to RM 66.3 as demonstrated in the profile analysis and on a local basis oversteepened the channel slope. Immediately downstream from this reach, from Duke Bar to Upper Jackson Bend, there was limited change due to adequate sediment conveyance through this reach. Beginning near Upper Jackson Bend, the channel slope significantly flattens and data suggest approximately 5 feet of aggradation, within the Lambert Bend reach (RM 64.8 to 63.7), has occurred over the 20 year period. **Figure 8** presents a comparison of the 1982 to 2005 cross section at Lambert Bend (RM 64.68). The growth of the huge point bar at Lambert Bend and its related opposite bank erosion is the manifestation of this aggradation. Again, the aggradation at the Lambert Bend reach oversteepened the local channel slope resulting in the degradation between RM 63.7 and 62.5. The remaining reach (RM 62.5 to 60.8) is characterized by general aggradation, including the growth of Five Islands, Five Islands Bar and Coffee Island. Cross section data, **Figures 9 and 10** indicate bank erosion and some degradation is occurring within this reach (RM 63.23 and RM 60.82) - on a local basis, opposite bank erosion. Additional cross-sectional survey data comparisons are available in **Appendix B**.

4.3 Sediment Analysis

Finally the Stakeholders Group project evaluated sediment data of the Lambert Bend portion of the river system to determine whether steady state (well sorted, well graded) sediment conditions exist or if the system is inherently active, episodic and disruptive. The Stakeholders Group completed fourteen Wolman Counts of the surface material at several gravel bar locations and collected ten sub-armor samples for sieve analysis. The Wolman Count is a field method that actually provides a textural analysis of the armor (or coarse surface) layer on the surface of a bar. The sub-armor was analyzed by the more traditional sieve analysis method.

In a natural, stable channel a well-developed coarse armor will protect the underlying and significantly finer, sub-armor. This coarse armor develops on the surface of a bar after numerous smaller events have winnowed away finer sediments. Only during the more extreme events (generally greater than the 5-year) will the armor actually move and will the sub-armor become mobile. The average grain size of the armor is typically an order of magnitude or greater than that of the sub-armor. Because of its significantly larger particle size and its resistance to entrainment under lower flow conditions, the armor layer (which on a spatial basis reflects less than 1% of the channel bed alluvial materials) will often dictate the conformation of the channel bed (Schumm, 1977).

Figure 8

Cross Section Comparison At River Mile 64.68

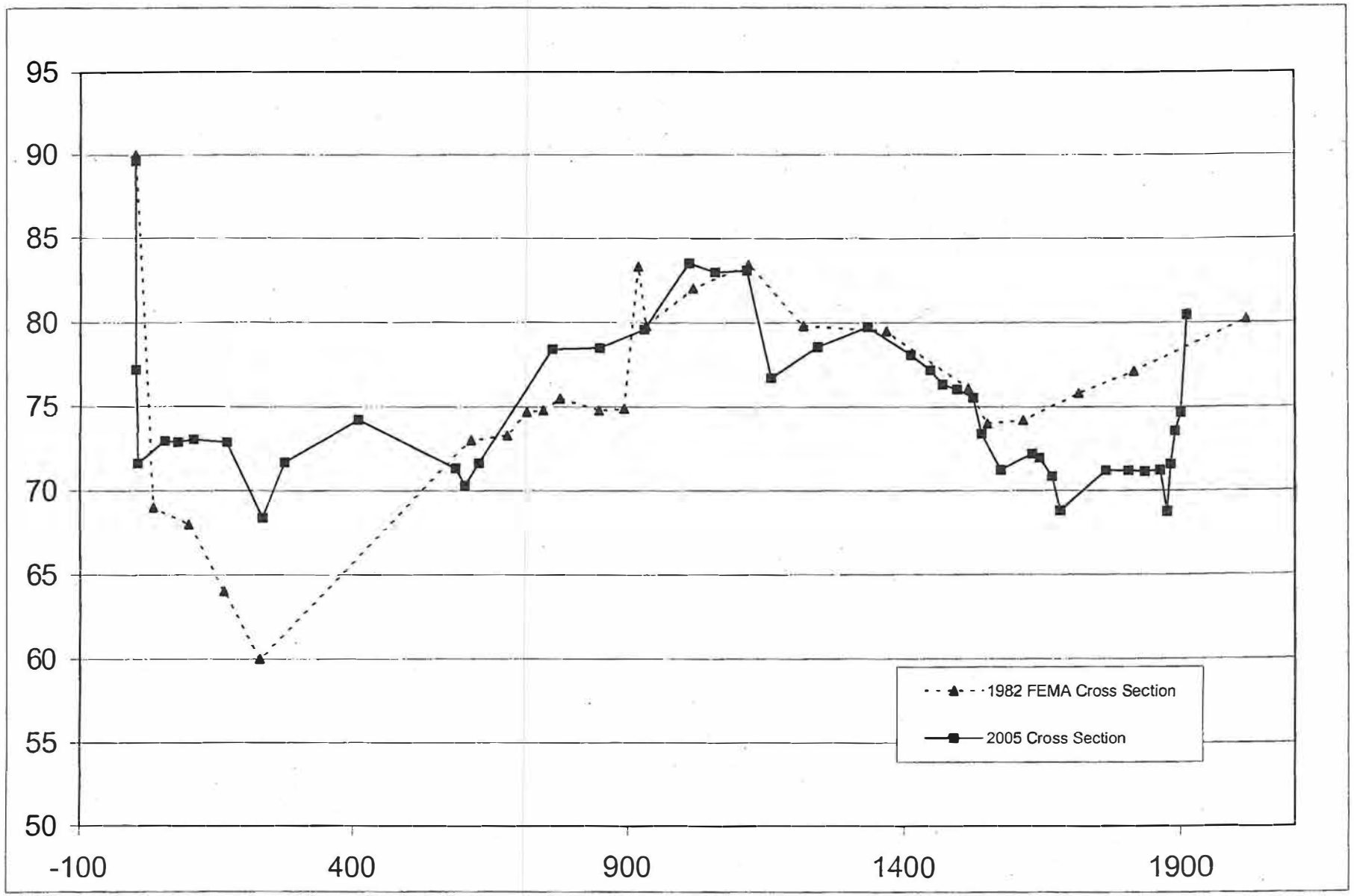


Figure 9

Cross Section Comparison At River Mile 63.23

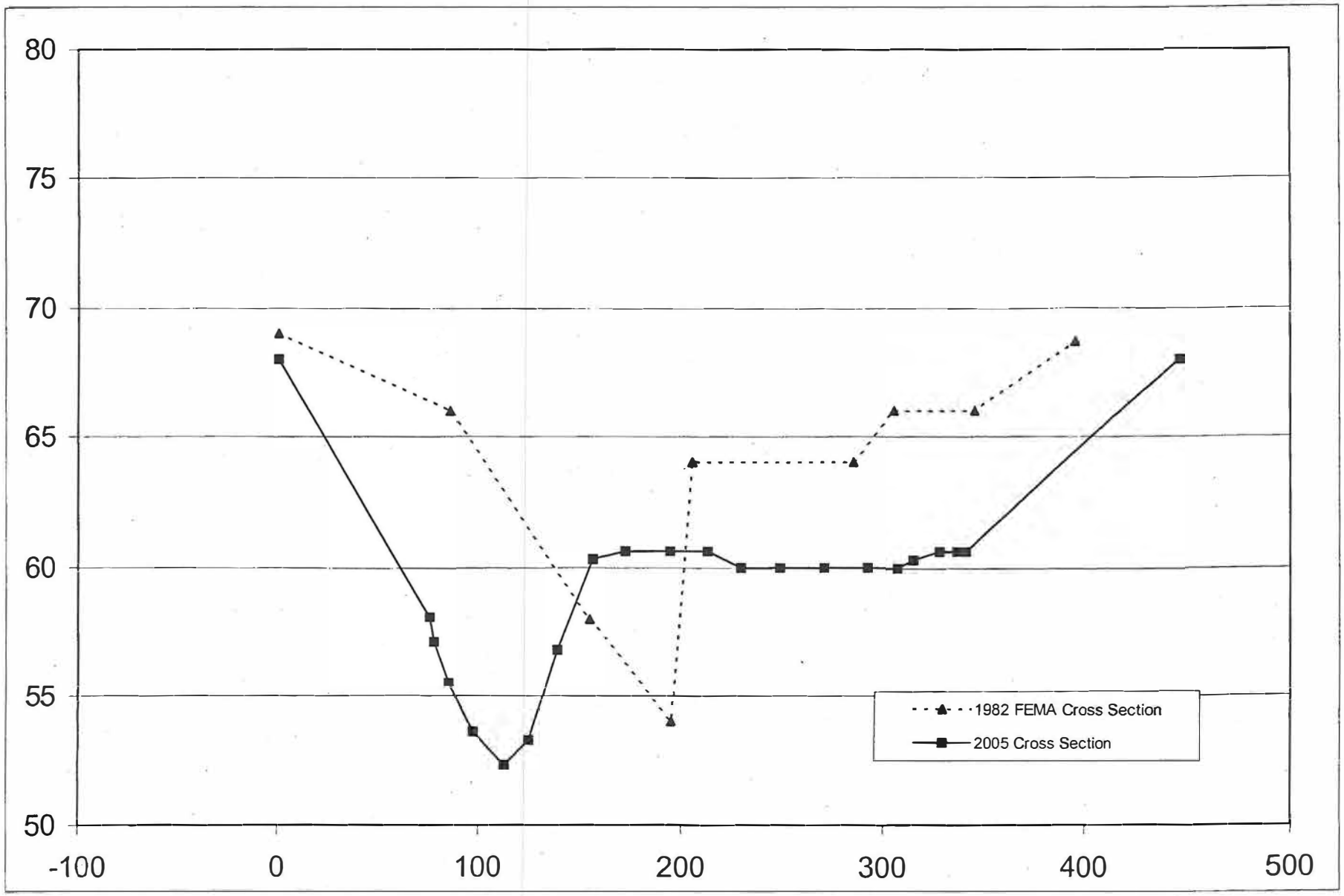
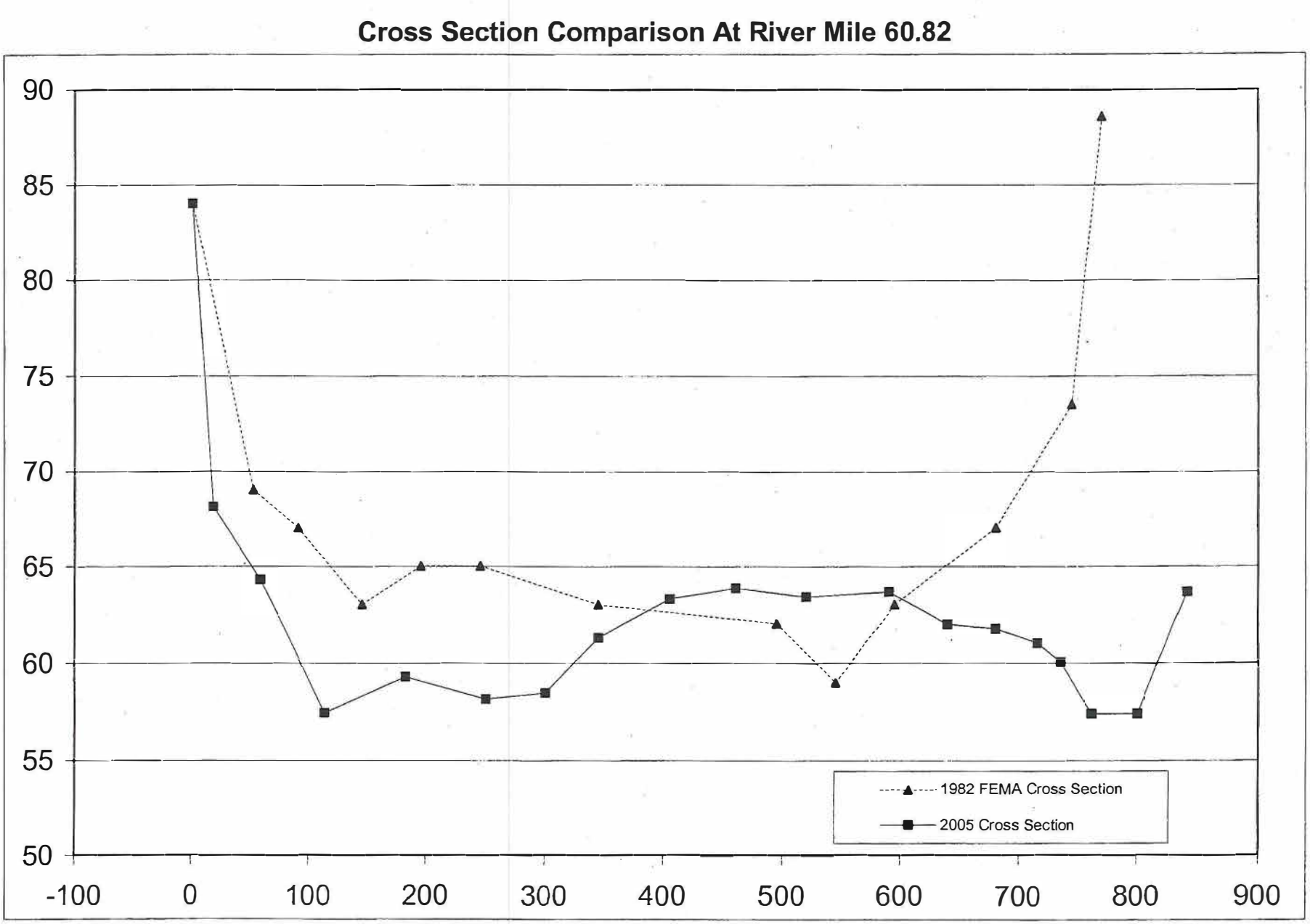


Figure 10


Cross Section Comparison At River Mile 60.82
90
85
80
75
70
65
60
55
50
-100
0
100
200
300
400
500
600
700
800
900
1982 FEMA Cross Section
2005 Cross Section

The absence of an armor layer indicates disruption of the bed by an extreme flow event or an unstable river system, where sediment transport and deposition is episodic and disruptive. Parallel to this thought, where an armor layer is not present or has been disrupted, the channel bed is very responsive to nearly all high flow events and as such may be seen as unstable. **Table 2** compares armor to sub-armor grain size in paired samples. A graphical mean, rather than a median (D_{50}) grain size was used to describe the different strata, due to the poorly sorted character of the sample. The graphical mean is superior to the median because it is based on the average of three points on the curve (D_{16}, D_{50} and D_{84}), rather than simply one (D_{50}).

Table 2, Sediment Data from Select Locations

	Location 1		Location 4		Location 9		Location 10	
	Armor	Sub-armor	Armor	Sub-armor	Armor	Sub-armor	Armor	Sub-armor
Mean Dia. (mm)	23.5	10.9	21.2	13.3	42.5	19.3	21.7	13

In LA's review of these data it is clear that the difference in the mean particle size of the armor to the sub-armor is very small, indicating that either the rate of deposition is too great to allow much sorting and winnowing or recent flows have been so significant that the surface armor was disrupted. At the time of this sampling exercise (July 2005) no extreme event flows had occurred along the Willamette River since 1999, so the more likely scenario is that each deposit of bed material on the sampled bar has been episodic, catastrophic and unsorted. There has been insufficient opportunity for the development of a typical well-sorted armor to sub-armor ratio.

This information is further borne out by a statistical analysis of five channel bar sub-armor samples. **Figure 11** presents the grain size distribution curve for five samples collected in the vicinity of Lambert Bend. Samples 05-01, 05-02 and 05-03 were collected in a downstream to upstream direction along the LB bar between RM 64 and 63. Samples 05-04 and 05-05 were collected at Lower Lambert Bar near RM 64.64. All five samples are poorly sorted and strongly fine skewed indicating that they were deposited in a non-uniform and unstable flow and sediment transport conditions.

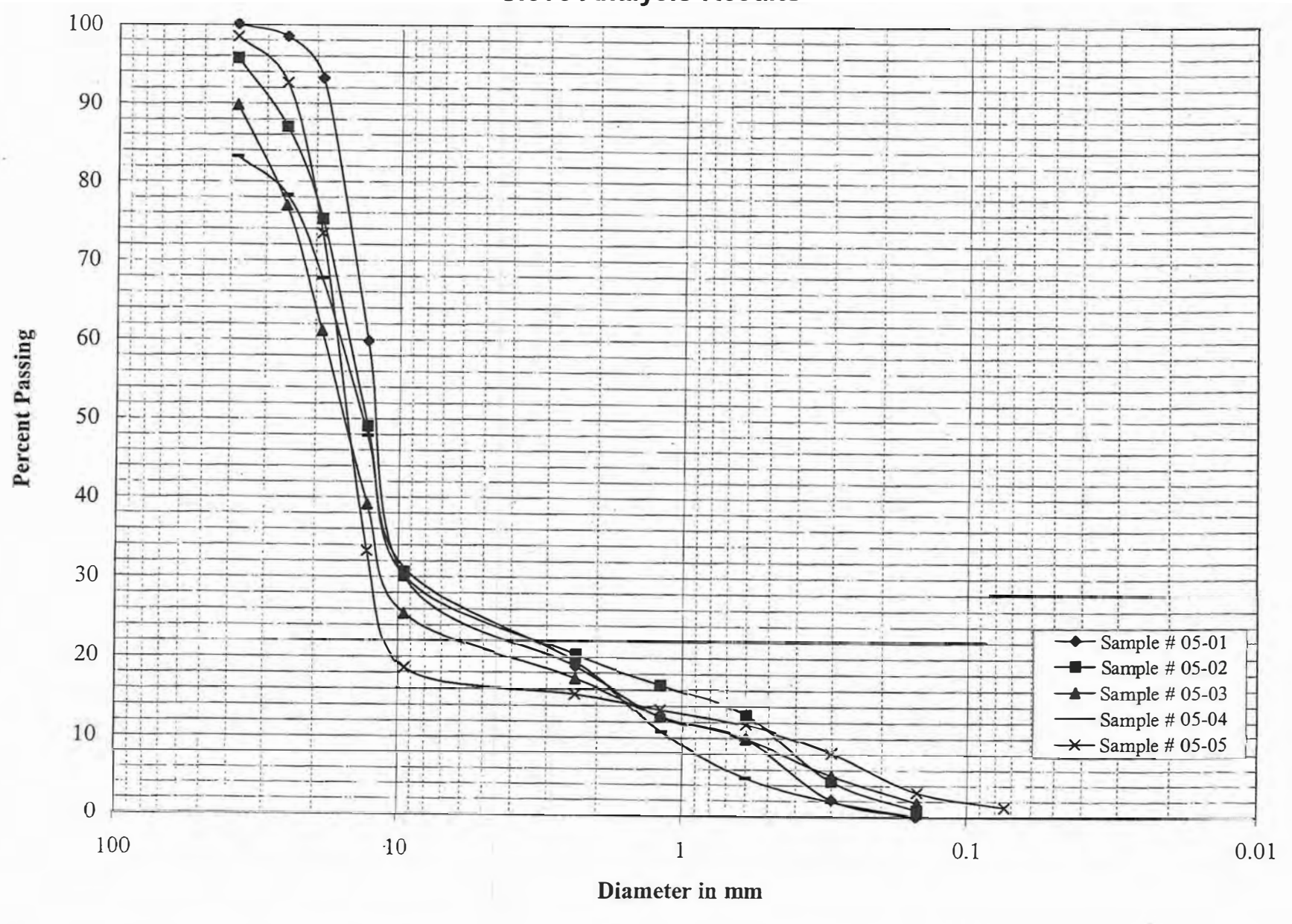
5.0 FISH HABITAT ANALYSIS

This portion of the river is used by the federally listed Chinook salmon and steelhead trout, as well as several dozen other native and non-native species. Although this portion of the river is generally too warm for juvenile Chinook salmon during the summer, they will find pockets of cool water to survive. Cool water can be found seeping into the river at the downstream end of gravel bars and the bottom of deep pools. Both steelhead and Chinook have been found in the alcove on the east side of Windsor Island.

The current geometry of the river between RM 65 and RM 63 results in fish habitat features that are now relatively rare along the Willamette River and are conducive to rearing of salmonids and other native fishes. The long alcove created by the expanding headcut across Lambert Bend (upstream of RM 62) provides fish refuge from high-velocity water during the winter and year-round feeding opportunities. The alcove probably gets too warm for salmonids during the

Figure 11

Sieve Analysis Results



hottest part of the summer, although they may find a pocket of cool water to retreat into at the most upstream end of the alcove. The large island of gravel at the upstream end of Lambert Bend probably has cool water exiting from its downstream face and provides refuge for fish during the hot part of the year.

For the majority of the year, the water in the alcove is still and supports aquatic organisms that are preferred food for fish. This area is in contrast to the main channel, where the river is usually too fast for fish during high flow events and fish will retreat to the margins of the river at other times of the year. Flood plains, when inundated, provide fish large quantities of terrestrial food and they will feed vigorously during major overbank episodes.

The outside of the river bend between RM 63.8 and 63 flows against a hard bank (Feasters Rock), which creates an unusually deep thalweg (or deeper channel). Here, adult salmon and steelhead on their way to spawning grounds will rest. Salmon and steelhead do not spawn in the Willamette River but use cool tributaries instead. The proximity of slow water on the inside of the bend to fast water on the outside allows resident fish to conserve energy when they feed by stationing themselves in the slow water and darting out into the fast water to retrieve food items that float by.

If the river were to cut through Lambert Bend, the existing channel between RM 63.8 and 63 and the alcove would exchange characteristics. The existing main channel would become a side channel with relatively slow water or may completely dry up. The alcove would become a turbulently unstable feature, where the water would be swift and standing waves would create a fish barrier during the more extreme flood events. Over time the abandoned main channel (meander) would likely plug with gravel at the upstream end and become an alcove. For the initial years following the capture of the alcove by the Willamette River, the undersized "new channel" would actively widen, continue to headcut and contribute sediment to downstream sources. The alcove would be an unstable channel feature until the Willamette River through this reach achieved a new state of final equilibrium.

Both the existing condition and a "long term" scenario where the river cuts through Lambert Bend offers good habitat for native fishes. Each includes areas of refuge from fast water, preferred feeding areas, and refuge from high summer temperatures in the main channel. One must recognize that there will be a "short term" impact associated with the channel cutoff. In particular this impact will include unstable channel geometry and adjustments of the channel bed. As described later in this report, should the river's cutoff of Lambert Bend also result in the capture of downstream gravels by the river, fish habitat would be affected negatively for a much longer period of time. Each of the captured pits would become sinks for bedload and lead to a reduction of fresh gravels in downstream reaches. Also, if the gravel pits had no egress channel for fish to escape back to the main channel, fish stranding could occur and lead to summer mortality when the water in the pits warms. Multiple pit captures may cause abandonment of the current mainstem channel at Weston Bend. If the channel shifts south and west of Weston Bend via multiple pit captures, this new deep channel could strand fish in the abandoned channel at Weston Bend.

6.0 FLOODPLAIN MINES AT WESTON BEND

Mining near Weston Bend has been on-going for the last four decades with increased mining activity over the last two decades. **Table 3** lists these floodplain sites including permit holder, mine depth, total acres zoned for mining, acres disturbed, etc., for each site. Off-channel mining began in the mid-to-late 1960s at the Youngblood Pond, DOGAMI ID 36-0015. By 2005 Yamhill County had rezoned a significant portion of this floodplain for mining. Existing permit boundaries and pre-law sites are delineated on **Figure 12**. The depth of mining for the earliest mines was limited by the type of equipment used to excavate below the water table. These early draglines were capable of mining below the water level to a depth of approximately 15 to 20 feet. The depth of actual gravel (and potential depth of mining) varies from 20 to 60 feet. As the demand increased in the 1980s, the operators began de-watering operations to access additional resource. One can anticipate that mine pits, which were developed during the modern (post 1980's) period fully extract the mineral resource and mine depth will range from 30 to 50 feet below the existing thalweg of the Willamette River. A total of 169 acres have been disturbed by mining and related activities. A total of 191 un-mined acres are located within the approved permit boundaries established by the county and DOGAMI. As of 2005, a total of approximately 11 million yards have been mined from these sites.

DOGAMI regulates mining activities on post-1972 areas to ensure that each mining company completes their reclamation in accordance with their approved reclamation plan. There is no mechanism in statute to require new reclamation plans of previously issued permit approvals or invoke reclamation requirements for pre-law sites. Older permits were unsophisticated in terms of requirements to protect the river and fisheries. Likewise, there are no legal requirements for adjacent operations to integrate floodplain reclamation and flood control strategies into a comprehensive plan. Newer permits have been written to protect migrating fish, which may enter the ponds during flooding and to stabilize floodwater entry points.

6.1 Coffee Island Bar and Youngblood Pond

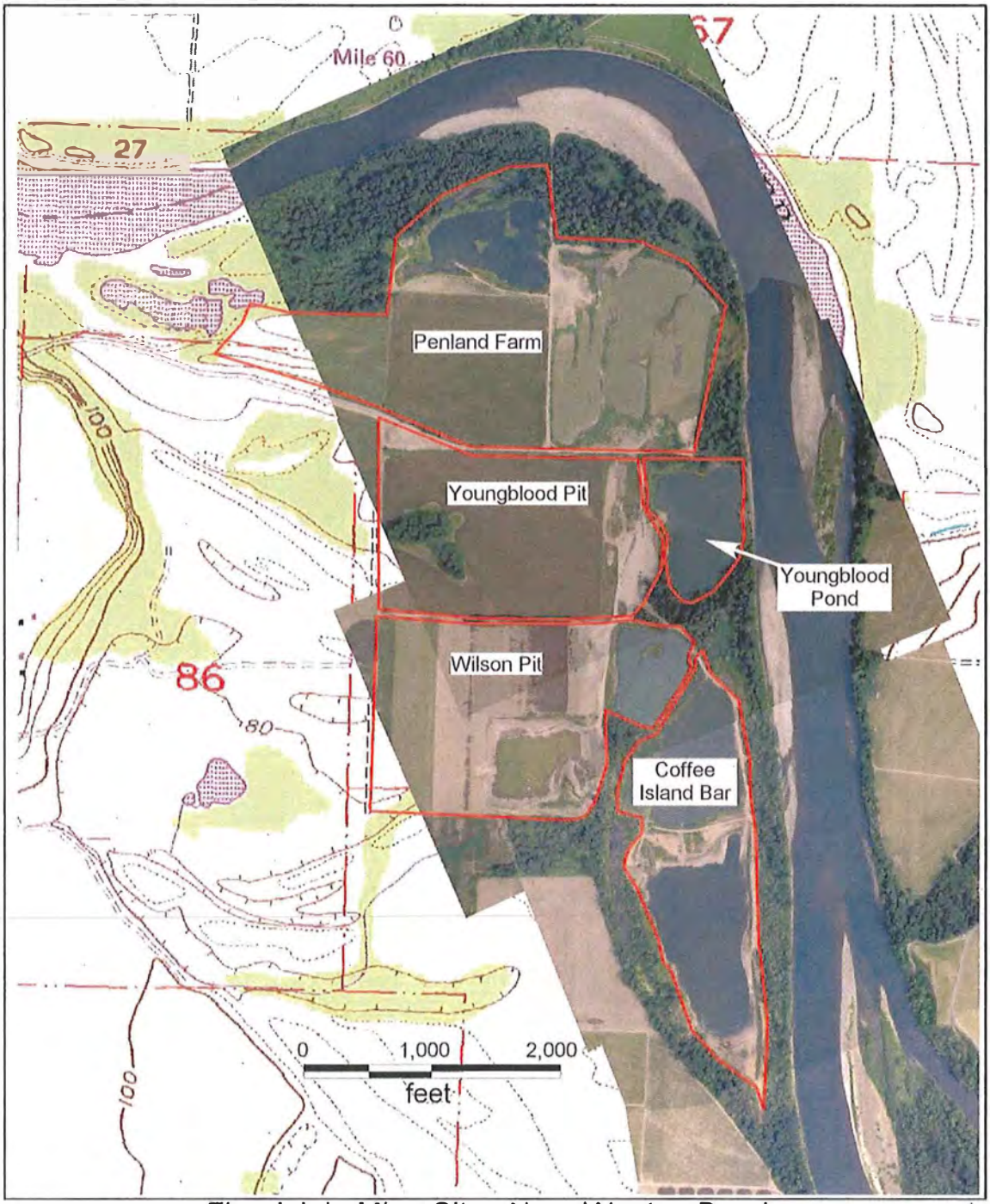
These older gravel ponds are the most vulnerable to pit capture. They are located near river mile 61.5 within a riparian area. The Coffee Island Bar excavation site was permitted in 1976 with an undisturbed 300-foot setback from the ordinary high water line of the Willamette River. The Coffee Island Bar ponds have been excavated to a depth of 60 feet below ground level. The more shallow Youngblood Pond was dug with a 50 foot off-set from the Willamette River and likely extends no deeper than 20 feet below ground level.

6.2 Penland Farm

The permit boundary was expanded in 1995 when an additional 67 acres were zoned for mining. The amended permit requires the use of riprap or flat slopes to stabilize the entry point for floodwaters. The permit also requires monitoring for the presence of fish and reporting during pit de-watering. This monitoring is particularly important following a flooding event which results in a temporary connection of the pit to the Willamette River. Depth of these off-channel pits range from 25 to 45 feet below ground level.

Table 3, Floodplain Mine Sites Near Weston Bend

DOGAMI ID No.	Site Name	Mine Depth	Date of Reclamation Plan	Exempt Acres	Disturbed Acres	Permitted Acres	Permit Status	Permittee/ Operator	Ownership
36-0049	Penland Farm	25 to 45	08/19/86	0	57	144	Permitted	CC Meisel Co., Inc.	Same
36-0054	Youngblood Pit	Stockpile Yard (35' proposed)	09/10/98	0	9	58	Permitted	Baker Rock Crushing Co.	Same
36-0050	Wilson Pit	50	04/06/92	0	34	80	Permitted	CC Meisel Co., Inc.	Wil Wilson
36-0037	Coffee Island Bar	60	11/01/76	0	54	54	Permitted	Baker Rock Crushing Co.	Wil Wilson & Baker Rock Resources
36-0015	Youngblood Pond	20	NA	15	15	NA	Pre-law, inactive	Dayton Sand & Gravel	Baker Rock Resources



Floodplain Mine Sites Near Weston Bend

Photo Date: 6-30-2004

Oregon Dept. of Geology and Mineral Industries
Mineral Land Regulation and Reclamation Program

Figure 12

6.3 Youngblood Pit

This site was permitted in 1998 but has not yet been mined. A fish ingress/egress channel is required along with rock-lined spillways into the pond. DOGAMI permit requirements also require partial backfill of the pre-law Youngblood Pond to widen the distance between the Willamette River and the proposed pit and pre-law pond.

7.0 FIELD VERIFICATION

During July 2005, LA performed a cursory field reconnaissance of the project area and through visual observation, identified reaches of instability. This analysis was not comprehensive. The purpose of this analysis was to provide examples and base photography for areas of immediate concern. As discussed in several previous sections, the left bank near river mile 64.2 is actively eroding. Erosional activity has been ongoing for several decades and the bank showed no signs that it is beginning to stabilize. Currently, the river's dominant flow path is along the natural meander curve towards Feasters Rocks. At higher flows, the Willamette River overtops the left bank at RM 64.2 and flows toward the north where it reunites with the river (RM 62.2) at the Lambert Bend cutoff. Overflow channel development has resulted in creation of a headcut where the flood flows rejoin the river at RM 62.2. In the summer of 2005, members of the Stakeholders Group placed several thousand tons of rock and buried a rock weir (Rock Riprap Barrier Project) as an interim measure to slow further upstream migration of the headcut. The riprap was donated by CC Meisel Company and was placed by Baker Rock Resources. **Figures 13 and 14** illustrate the actively eroding bank near RM 64.2 and the headcut near RM 62.2.

Observations indicate that the right bank upstream from Feasters Rocks (RM 63.8) is relatively unstable. A dense stand of trees and brush along the right bank are slowly slumping into the main channel (**Figure 15**) but there is no evidence the channel is migrating.

The left bank downstream from the headcut (between RM 62.4 and 61.8) is also actively eroding. At this location, the river is characterized by steep nearly vertical banks that are littered with trees originally anchored to the bank as seen in **Figure 16**.

8.0 ANALYSIS CONCLUSIONS

The various sources of information can be compiled to trace the river's historic geomorphic behavior and to provide a basis for inferences about future changes. Geomorphic analysis of historical bank line changes suggests that the Willamette River, within the study area, is a geomorphically active channel reach. Abandoned channels, flood scars, and oxbow lakes are present on both the right and left bank floodplains. During the photographic period of record (1936 to 2003), active bank erosion and sedimentation has occurred and LA has identified three locations that have exhibited large scale geomorphic changes. They are Windsor Island (RM 75), Wheatland Bar (RM 71), and Lambert Bend (RM 64.2).

Since 1936 the Willamette River at Windsor Island and Wheatland Bar has displayed an overall channel straightening and evolved from a braided (multiple channel condition) to a single thread system. These changes have been man induced. On a watershed basis, RM 78.5 to RM 60 of the Willamette River has decreased its sinuosity (meandering tendency) and by so doing, has

Figure 13
Erosion at Lambert Bend

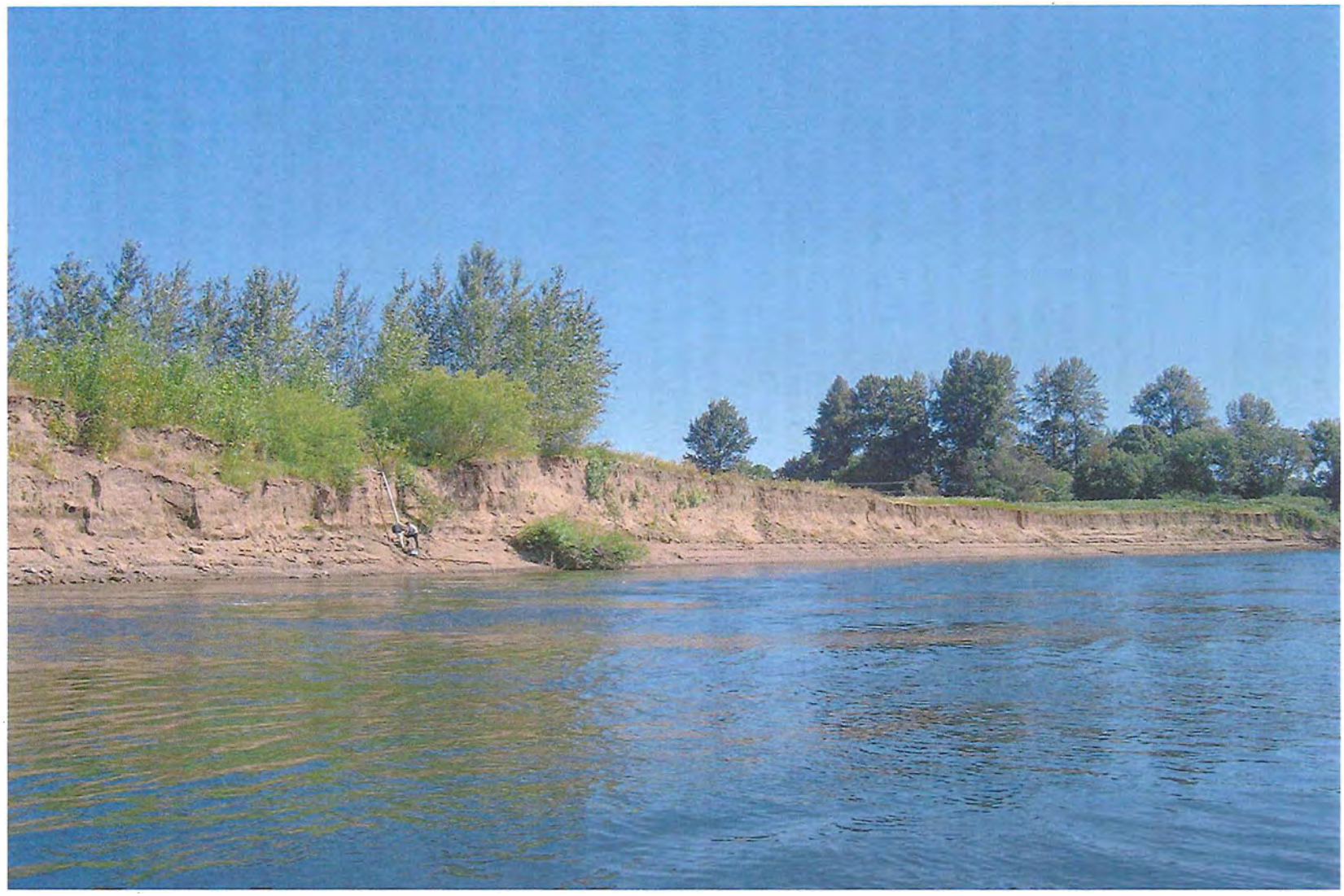


Figure 14
Headcut Erosion at River Mile 62.2

Figure 15
Minor Erosion Upstream of Feasters Rocks at River Mile 63.8

Figure 16
Bank Erosion Near River Mile 62

increased its hydraulic efficiency to convey sediment. The increased hydraulic efficiency or stream power has resulted in erosion which has generated both bank and bed material for transport downstream. In particular, this increased erosion has arisen from channel straightening (and dredging) projects, resulting in degradation at Windsor Island and Wheatland Bar. Material generated from these locations is conveyed through a well-protected (well revetted) and hydraulically efficient river reach and is now being deposited at three sites: Lambert Bend, Five Islands and Coffee Bar. The data suggest that a combination of upstream dam construction, channel straightening through the Corps dredging program, and Corps bank revetments, which have resulted in improved conveyance capacity, has changed the balance between sediment load and discharge. Five years of relatively low peak flows along the Willamette River (2000 through 2005) and very limited maintenance dredging has allowed such bars as Lambert Bar to grow into such large features that they are locally controlling the river's behavior. These bars are no longer transient alluvial features but have grown to such proportions that they have developed into permanent features within the historic channel banks.

A second factor in the increase in downstream channel instability was the dam construction on Willamette River tributaries, which created a sediment deficient environment. Water discharged from the dams is "hungry," meaning the river is looking for sediment to transport. The river reacts by downcutting below the dams and the channel bed serves as a source of sediment material for the lower channel reaches. Coinciding with dam construction in 1942, LA observed an increase in sediment deposition between RM 78 and RM 66. Sedimentation reduced the meander amplitude of the river by depositing material between gravel bars and closing side channels in areas like Windsor Island and Wheatland Bar. Simultaneously, bank revetment projects were constructed within the study reach to reduce bank erosion initiated by this increased level of sedimentation. Since 1963 the channel geomorphology of the river between RM 78 and 66 has remained relatively stable. LA believes the combination of channelization and bank revetment projects has increased the conveyance capacity within this reach and created channel degradation near Windsor Island. Sediment derived from this area moves through the system more quickly and appears to be depositing between RM 65 and 60.82, specifically, near Lambert Bend (RM 64.2), Five Islands, and Coffee Bar. Active bank erosion has occurred along the left bank and sedimentation or "progradation of the bar" has occurred along the right bank.

9.0 PREDICTIONS OF CHANNEL RESPONSE UNDER A DO NOTHING ALTERNATIVE

LA's primary geomorphic concern with respect to Lambert Bend is an impending channel cutoff near RM 64.2. The hydraulic conditions in the bend and variations in bank material have caused an enlargement in meander amplitude and a decrease in radius of curvature. The continuation of these processes will ultimately result in a meander cutoff. At the apex of the meander (Feasters Rocks), the presence of bedrock control prevents any further and significant enlargement of meander amplitude; this condition will increase the riverine stresses to decrease the radius of curvature of this bend - leading to an inevitable cutoff. The Corps has unsuccessfully attempted to "protect" the left stream bank at RM 64. Since the completion of the Finnicum Dike construction, landowners working with the Yamhill County Improvement District No. 1 and the Yamhill County Soil and Water Conservation District have attempted to obtain permits to mine Lambert Bar in an effort to obtain funds for increased levels of bank protection

along the rapidly eroding left stream bank. The necessary permits were not obtained and over the last 20 years, the increasingly more direct impingement of stream flow onto the left bank and the naturally occurring hydraulic conditions have resulted in accelerated rates of erosion.
Should no effort be made to prevent this cutoff from occurring, the geomorphic trend data indicate that the Willamette River will respond as follows:

- The ensuing cutoff will initially oversteepen the channel gradient. This will cause scour upstream and deposition downstream. On a local basis and in the immediate vicinity of the meander cutoff, the channel bed will initially deepen and then widen to a new equilibrium condition, The process of channel widening is a long-term process and will generate tremendous quantities of sediment for deposition along downstream channel reaches. Channel widening will continue until the channel cross sectional geometry reaches its new equilibrium state with channel slope. The channel will "seek" a balance between sediment transport capacity and discharge by adjusting its slope, width, depth and plan form.

- Hydraulic analysis of the existing versus the post-cutoff condition suggests that there may be an initial 30% increase in pos- cutoff channel velocity at the RM 64.68 cross section at the relatively low flow (less than 2-year flood frequency) of 40,000 cfs. A flush of sediment will be transported to and deposited within the downstream reach (RM 62.3 to RM 60.5). This reach includes Five Islands and Coffee Island Bar, as well as active mining operations of CC Meisel and Baker Rock. Once deposited, this flush of sediment will force additional plan form changes including an increase in channel sinuosity and channel meandering. As one can see (from **Figure 5**), this LB area of the Willamette River is unprotected and any increase in channel meandering will result in severe bank erosion and ultimately the capture of multiple off-channel mine pits between RM 61.9 to 61.0.

- The pits closest to the river have been mined to depths up to 60 feet and are located at RM 61.8. Once this deep mine pit is captured, the resultant thalweg change will result in more channel erosion, channel bed and bank instability and ultimately a new cycle of multiple pit captures. The resultant cycle of pit captures will initiate another meander cutoff at Weston Bend. The net result of these channel changes will be thousands of tons per year of newly recruited sediment to downstream reaches, resulting in additional channel instability. Disequilibrium at this location will translate upstream and downstream through the system. The post capture bed lowering at each capture point will also result in partial de-watering or abandonment of the existing channel bed and headcut migration upstream for significant distances.

10.0 RECOMMENDATIONS

10.1 General Philosophies Considered in Alternative Development

There are three general philosophies to be considered in the development of alternatives for a Master Reclamation Plan for the area around Lambert Bend. These philosophies are (1) to allow the river to develop its course and allow pit capture, excessive bank erosion and channel

instability; (2) implement structural and non-structural control measures that would lessen the potential or stop the meander cutoff from occurring; and (3) control the source, delivery and deposition of the sediment that is initiating the cutoff. A combination of these philosophies may be appropriate. Before the alternatives are introduced, one should address the consequences of inaction.

Neither the cause nor the effect of the river's behavior at Lambert Bend is a fully natural process. It has been initiated by the historic human-induced alterations to the system and intervention will be required to address it. Specifically, the Willamette River is a dynamic system and is currently out of equilibrium. By allowing the river to continue at its present state, one can anticipate that the river will continue to erode north towards the existing headcut and eventually a meander cutoff will occur. This action will cause a significant adjustment in channel geometry, thereby establishing a prolonged period of channel disequilibrium upstream and downstream of the cutoff. The consequences will allow the direct flow of the Willamette River towards Five Islands. This will create a new sediment source that will impact channel geomorphology. Channel changes at Lambert Bend can initiate pit capture. There will be tremendous loss of farmland and it may also cause erosion and scour in the existing riparian areas. The conveyance capacity of the "captured" system will be grossly altered resulting in additional upstream and downstream impacts.

These anticipated adverse impacts lead the Stakeholders Group to the conclusion that human intervention is necessary to protect the channel. The most desirable conclusion is the implementation of strict control measures to stop the meander cutoff from occurring, improve reach conveyance and develop local sediment storage opportunities. Alternatives will be discussed further in the following sections.

10.2 Recommended Alternatives

With the above approaches in mind, LA in conjunction with the Stakeholders Group has developed several alternatives. The key to any design alternative will be the design flow or the probability of failure. The following alternatives are conceptual in nature and will require additional geomorphic study and engineering design work. Other alternatives may develop through coordination with regulatory agencies. The following discussion is for informational purposes and *should not* be construed as a design since a detailed design and hydraulic analyses were not conducted.

10.2.1 Alternative A: Construct Bank Revetment and Upgrade Grade Control

Alternative A involves the implementation of structural and non-structural control measures at the impending Lambert Bend cutoff. Structural measures include additional earthwork, excavation and placement of additional rock in the vicinity of the recently constructed (2005) grade control. Slope, hydraulic stability and rock launching will have to be addressed in the design. Coupled with these improvements (above the Ordinary High Water Line) this alternative should include some stabilization of the left bank near RM 64.2 and the construction of stream barbs to improve sediment conveyance between RM 62.4 and 61.0. Biotechnical slope protection, native vegetation and large woody debris will enhance the project. Improvements of the alcove at the mouth of the Lambert Bend cutoff will help maintain the alcove feature, which is a preferred winter habitat type for juvenile salmonids. This alternative recognizes that removal of the bar may not be an option due to the difficulties in obtaining permit approval to remove

gravel from the system. Some right bank channel improvements to enhance sediment conveyance at Five Islands should be evaluated during final design.

10.2.2 Alternative B: Construct New Structure at Lambert Bend Cutoff and Remove Finnicum Dike

Alternative B requires a redesign and implementation of the structural controls at the impending Lambert Bend cutoff, removal of Finnicum Dike at RM 64.25 and the development of non-structural controls. This alternative would consist of additional earthwork, excavation, and regrading of the headcut and construction of a rock chute (drop) into the headcut. Rock from the recently constructed (2005) grade control will be integrated into the design. Energy slope and hydraulic stability of the proposed structure will be addressed in the design. Finnicum Dike removal would open a historic flood channel blocked by the dike construction. The rock removed from the dike could be used in the construction of the rock chute at Lambert Bend cutoff. Dike removal will provide habitat diversity within a wetland complex now isolated from flushing flows. Flooding within this historic channel could also improve local channel complexity. An alcove constructed where the flood channel joins with the mainstem could provide off-channel habitat for salmonids. Coupled with these improvements (generally above and partially below the Ordinary High Water Line) this alternative includes some stabilization of the left bank near RM 64.2 and the construction of stream barbs to improve sediment conveyance between RM 62.4 and 61.0.

Biotechnical slope protection, native vegetation and large woody debris will enhance the project. Improvements at the mouth of the Lambert Bend cutoff will help maintain this alcove feature. This alternative recognizes that removal of the bar may not be an option due to the difficulties in obtaining permit approval to remove gravel from the system. Some right bank channel improvements to enhance sediment conveyance at Five Islands should be evaluated during final design.

10.2.3 Alternative C: Regrade, Reshape, and Partial Removal of Gravel Bar

Alternative C requires working below the Ordinary High Water Line. This work would consist of removing a large amount of material (reducing overall height) and reshaping the gravel bar (the island) in the form of a chevron. Reshaping the gravel bar can be done in a way that will maintain and possibly enhance fish habitat and certainly improve channel geometry through the curve at Lower Lambert Bar. With the bar geometry modified, the left bank of Lambert Bend can be meaningfully protected. A series of stream barbs or bendway weirs will be constructed to redirect flow towards the reshaped gravel bar, increasing conveyance capacity of the reach. These structures will also allow for some sediment storage along the left bank. This alternative can and should be integrated into Alternative A or Alternative B and will address and integrate fisheries and improvements to the existing fishery habitat.

10.2.4 Alternative D: Regrade and Relocate Gravel Bar (EFS)

Alternative D requires working below the Ordinary High Water Line but would not remove gravel from the system. Within-channel barforms are a dominant form of new riparian land formation along the Willamette River. Progressive abandonment of the active channel by its infilling with sediment allows the bank to prograde or grow outward as the bar becomes attached to the bank (Dykaar and Wigington, 2000). Alternative D would use natural geomorphic processes as a template. The work would be designed to create conditions which would accelerate the

attachment of Lambert Bar to the left channel bank at the upstream end. An artificially constructed log-jam and gravel plug could be placed at RM 64.6. Downstream of the log-jam and gravel plug the channel would be left open to allow the formation of a new alcove between the bar and the downstream left channel bank. Adding large woody debris to the gravel plug may facilitate subsurface flow into the alcove. This work would consist of regrading Lambert Bar in the form of a chevron and/or gravel removal down to low-water elevations along the south edge of Lambert Bar. This would provide more conveyance capacity for the RB channel and would develop backfill quantities to close off the low-water left bank channel at RM 64.6. With the bar location modified this would essentially result in the formation of a point bar on the left bank with a downstream alcove. The bar would be stabilized with cottonwoods and other riparian plantings. A series of stream barbs or bendway weirs may be needed to facilitate additional sedimentation along the left bank and redirect flow towards the right bank channel, and to increase conveyance capacity through reach. This alternative can be integrated into Alternative A or Alternative B and could result in fisheries improvements by creation of additional diversity of existing fish habitat. Maintaining adequate conveyance capacity along the left bank and ensuring no new erosion at this location is an essential engineering design consideration.

10.3 Final Comments Regarding Implementation of Alternatives

Alternatives will require a 404 permit from the Corps, a fill/removal permit from the Department of State Lands and a Yamhill County floodway permit. Approval from the U.S. Department of Agriculture – Natural Resources Conservation Service for any work inside of the Emergency Watershed Protection easement at Lambert Bend will also be required. Coordination with area landowners, Oregon Department of Fish and Wildlife, National Oceanic and Atmospheric Fisheries (for Endangered Species Act (Section 7) consultation), the U.S. Fish and Wildlife Service and other interested groups or organizations will also be necessary. Due to fisheries issues, the Stakeholders Group should be prepared to address and work under limited time frames when working in the river. During the design phase fisheries impacts will be evaluated. If the Stakeholders Group, in consultation with other agencies and interested parties, decides on an alternative or combination of alternatives that would potentially alter the river's course, detailed hydraulic designs will need to be prepared. Design criteria will require mutual agreement to ensure full understanding of all aspects of the project, including the natural dynamics of the system.

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JUNCTION CITY WATER CONTROL DISTRICT

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JUNE 2019

(The following comments regarding the Willamette Valley System Operation and Maintenance Environmental Impact Statement are provided by Junction City Water Control District, Junction City, OR (jcwatercontrol@Yahoo.com).)

The Junction City Water Control District (hereinafter referred to as "JCWCD") is a special district located in Lane and Benton Counties, Oregon, created in 1962 pursuant to Oregon Revised Statutes Chapter 553 (Water Control Districts). The district was originally created in an effort to reclaim agricultural land from annual flooding and its Sub-District 1 constructed, and now maintains, a system of ditches intended to control ground water flooding of that land. Its Sub-District 2 was created six years later for the purpose of constructing and maintaining a system of ditches to move purchased stored water from Fern Ridge Reservoir to lands within Sub-District 2 (via the Long Tom River) for irrigation and other beneficial uses. Operation and maintenance of the Willamette Valley System (hereinafter referred to as the "System") has a direct impact on JCWCD and its constituents and two of the System's authorized uses, flood control and irrigation, are directly related to the agricultural success of the district's constituents.

FLOOD CONTROL

Prior to the establishment of JCWCD and the subsequent construction of a flood control ditch system, agricultural lands between the cities of Eugene and Monroe, Oregon, were annually inundated with flood waters for months on end. Those lands were rendered virtually useless for farming. In the late 1960's JCWCD borrowed and bonded nearly one million dollars for the construction of the current ditch system. The ditches allow for successful agriculture by draining off much of the ground water that would otherwise drown most crops. Changes to the System that would result in additional flooding of agricultural land within JCWCD would have a direct, negative, impact on all farming operations thereon.

IRRIGATION

Many of the agricultural operations on land within JCWCD maintain individual groundwater wells that are directly affected by river levels and stream flows. Any changes to the System must take into account subsequent effects on agricultural wells that are located along the entire length of the System.

In 1968, following construction of a diversion structure and an irrigation ditch system for Sub-District 2, JCWCD entered into a contract with the United States for the purchase of stored water (Fern Ridge Reservoir via the Long Tom River) for irrigation and other beneficial uses.

The original contract provided entitlement to JCWCD to irrigate 2,768.7 acres with stored water purchased from the U.S. Department of the Interior, Bureau of Reclamation. Thirty-seven properties currently receive that water and the contract has been amended over the years to now include 3,237 acres entitled to receive 8,067.5 acre-feet of stored water for irrigation purposes.

The current contract, with all amendments, has a term of 40 years and requires the United States to release water from Fern Ridge Reservoir each year to JCWCD during an irrigation season from March 1 to October 31 for irrigation of land served by JCWCD.

JCWCD objects to any changes to the System that would affect the ability of the United States to perform its obligations under the contract to provide stored water to JCWCD. Reducing the amount of stored water in Fern Ridge to a level incapable of annually providing 8,067.5 acre-feet of it to JCWCD would have a destructive affect on the farming operations within the district. Any changes to the System must account for negative affects that result on authorized uses of System. The authorized uses of flood control and irrigation are critical to JCWCD and its constituent farmers. Any curtailment of either authorized use will result in the district's thousands of acres being rendered useless for agriculture as they were prior to the 1960's.

JUNCTIION CITY WATER CONTROL DISTRICT COMMENTS - End

June 24, 2019

Col. Aaron I. Dorf

U.S. Army Corps of Engineers District Commander'

Portland District

P.O. Box 2946

Portland, OR 97208-2946

Sent by email to: Willamette.eis@usace.army.mil.

Attn: CENWP-PME-E

Dear Col. Dorf,

The McKenzie Flyfishers respectfully submit these comments to the U.S. Army Corps of Engineers (Corps) regarding the scoping period for the Notice of Intent to Prepare an Environmental Impact Statement for the Willamette Valley Systems Operations and Maintenance.

We appreciate the opportunity to offer our ideas on how some aspects of the project should be managed and maintained. These considerations relate to recovery of the fisheries of the Willamette Basin and, in particular, the recovery of the threatened species listed under the Endangered Species Act (ESA). This policy development seems particularly appropriate as the Corps has re-initiated formal consultation of Section 7 of the ESA with the National Marine Fisheries Service (NMFS) which will result in a revised Willamette Basin Biological Opinion (BiOp) better defining the threats resulting from the current operations of the Willamette Project.

We start our evaluation with the recognition, supported by all knowledgeable experts both within and outside of the "action agencies involved in the management of the Willamette Valley fishery: There is a very strong likelihood that within the next ten years the populations of ESA threatened species could be extirpated. Reversing this threat, in the face of continuing decrease of these populations will require aggressive and intelligent actions. Accordingly, in your preparation of the EIS, the McKenzie Flyfishers, based in Eugene, Oregon recommends the following considerations:

1. **Uncertainties Surrounding Down-stream Passage for Juvenile Fish:** The programs currently being developed for fish passage down from high-head dams in the basin will all involve technological solutions for the problem of moving juvenile fish safely and

efficiently from rearing habitat to waters below the dam. From the various pilot studies to date, it seems clear that attributes of each system are somewhat unique in above dam rearing habitat, reservoir conditions, unique dam structure and probably other factors that will emerge, each requiring the development program to resolve site-specific issues. The uncertainties inherent in the effectiveness of each of these projects are reinforced by the varying results from other fish passage projects in the Pacific Northwest. (Kock, T.J., et.al., 2019) Given this situation, it is important that each project is carefully monitored and, as indicated, studies carried out to assure that the project is proven to contribute to the recovery of the local fishery.

2. **Variation in the Timing of Outmigration Among and Within Species**: A related issue is the necessity for each fish passage program to recognize that recent research has demonstrated that anadromous fish migrate at various times, both between species (i.e., salmon and steelhead) and within species for reasons that are not entirely understood. The reason to consider this factor is that most trap-and-haul operations have assumed that migration is a calendar-specific event so that there is only seasonal support; increasingly we are seeing data which challenge this assumption. (see Schroder, K., et.al, 2016) This is an issue that could favor volitional fish passage systems and the advantages and disadvantages of that approach should be carefully evaluated for each program.

3. **Program to Assure That Fish Passage Programs Support Above-dam Wild Fish Sanctuaries:** Most of the documentation regarding the fish passage programs do not specify procedures to assure that fish moved above formerly barrier dams are actually wild fish and consistent with their ESA-listed designations. In some cases, using the criteria of fin-clipped and unclipped might suffice, but with steelhead particularly this may not be sufficient, as various non-winter steelhead have been imported into the basin. The general point is that there is a presumption that the above-barrier spawning populations represent **a wild fish sanctuary**. To assure that this happens, an active program needs to be in place. Particularly helpful will be genomic characterization of the various populations of native and out-of-basin introduced populations to assure that we can discriminate between groups. Also helpful will be an expansion of the current parentage analysis program to each of the fish passage projects. The results of these studies will provide a much-improved idea of the efficiency of each programs and as well as improved estimates of the actual effective population size compared to relying on redds counts.

4. **Dealing with the Uncertainties of Climate Change:** To date, Corps documents relating to the Willamette Project have not shown estimates of the likely effects of climate

change or how this could impact the allocation of project water. Given the limited basis that we have for extrapolating local effects into the future, this is not surprising. However, we do know that it is occurring and can result in unexpected and rapid changes in local environments. The example of the effect of the climate change and the drying Western United States and the resulting forest fires seems to support this position. Given this, the management and maintaince of Willamette Basin Dams should have sufficiently flexible policies and procedures to deal with the unexpected and not be constrained by rigid parameters, such as fixed rule curves, which make needed accommodations difficult.

5. **Allocation of Resources (Water) Managed by the Willamette Project:** In a recently-drafted policy document (ACOE, Willamette Basin Review Feasibility Study, 2017) the Corps proposed allocation of water to stakeholders based upon fixed percentages of the entire pool of the project. It seems that this is not currently an issue as, according to the Corps, there is sufficient water to meet the requirements of each stakeholder. Going forward, as discussed in 4 above, this may not be the case. Anticipating this possibility, it is necessary that any management policy for the allocation of resources from the Willamette Project meets the obligations of the Corps to meet standards by NMFS in the forthcoming revised BiOp. Secondly, it needs to be recognized that, from a conservation perspective, the Willamette Basin is not a single pool of water, but a complex system of spawning and rearing sites for ESA Listed fish and other species, which vary in their ability to respond to increased stress. For this reason, changes in water management in the project must allow for considerations of these constraints on allocations inherent in the obligation of recovery of the basin fishery and, particularly, their obligations under the ESA.

Thank you for accepting these comments and we hope that they will be implemented and prove to have some value in guiding this very important project.

Sincerely,

David Thomas

Secretary,

McKenzie Flyfishers

OREGON WILD

25 June 2019

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willamette.eis@usace.army.mil

Attn: CENWP-PME-E

Subject: Operations and Maintenance of the Willamette Valley System (WVS) — scoping comments

Please accept the following scoping comments from Oregon Wild concerning the Operations and Maintenance of the Willamette Valley System (WVS) Project, https://www.nwp.usace.army.mil/Locations/Willamette-Valley/System-Evaluation-EIS/. Oregon Wild represents 20,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy. Our goal is to protect areas that remain intact while striving to restore areas that have been degraded.

The Corps operates and maintains 13 multipurpose dams and reservoirs in the Willamette River Basin in Oregon, and hatchery programs. Since 1980, operations have been modified and structural improvements for fish passage and temperature control have been implemented to address effects of the WVS on ESA-listed fish. NEPA evaluations since the 1980 EIS have been project-specific. The Corps has re-initiated formal consultation under Section 7 of the ESA on the National Marine Fisheries Service's 2008 Biological Opinion for the Willamette River Basin Flood Control Project. This NEPA process will inform the ESA Section 7 consultation process.

The Willamette Valley Project was designed and constructed at a time before environmental concerns were well-integrated into our river and floodplain management systems. Through ESA consultation and other efforts, progress was made in adjusting Willamette Valley operations to harmonize with modern environmental values, but more can be done.

We are concerned that the separate ongoing efforts to allocate stored water in the Willamette system might limit restoration options under this planning effort. We urge the Corps to integrate these planning efforts and avoid making commitments in the Willamette Basin Review process that would limit options for conservation and restoration under this planning effort.

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We hope the current planning effort can continue and expand past efforts to allow the rivers and floodplains and ecosystems to function more naturally. We urge the Corps to consider alternatives that will:

- Allow rivers to be more dynamic in terms of flow and floodplain interaction. Maybe revetments can be removed in some areas to allow the river to access its historic floodplain. Consider targeted land acquisition in the floodplain to facilitate avulsion and river dynamics.
- Remove weeds from river banks and gravel bars so that native plants can continue to play their role in river ecology. Upstream from Corvallis some nasty weeds such as Japanese knotweed, purple loostrife, and scots broom, are just getting a foothold. They could be much more easily addressed now than in 10 years.
- Expand efforts to conserve native species such as salmonids and river otters, as well as less charismatic species such as lamprey, mussels, turtles, salamanders, frogs, macroinvertebrates. There may be beneficial adjustments to system operations, or more targeted habitat restoration efforts, that would benefit these species.
- Favor native fish populations over hatchery fish.
- Plan for changes expected as a result of global climate change, such as less snowpack, higher and more frequent bank-full flows, lower summer stream flows. The reservoirs in the Willamette Basin can only do so much to mitigate for these effects. The Corps should consider working with managers of public and private land in the Willamette Basin to maintain and increase carbon storage in forests to help reduce the effects of climate change, and reduce land management activities that exacerbate peak flows and low flows. These activities include cumulative landscape coverage of clearcuts, roads, dense young plantations. See Jones, J.A., Grant G.E., "Peak flow response to clear-cutting and roads in small and large basins, western Cascades, Oregon," Water Resources Research, 32(4) 959-974, April 1996 https://www.wou.edu/las/physci/taylor/g473/refs/jones_grant_1996.pdf; and see Perry, T. D., and Jones, J. A. (2016) Summer streamflow deficits from regenerating Douglas-fir forest in the Pacific Northwest, USA. Ecohydrology, doi: 10.1002/eco.1790. http://onlinelibrary.wiley.com/doi/10.1002/eco.1790/full.

Thank you for considering our comments.

Sincerely,

Doug Heiken
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COMMENTS ON WILLAMETTE VALLEY SYSTEM (WVS) - ENIRONMENTAL IMPACT STATEMENT (EIS) - SCOPING

COMMENT TYPE: Challenge – Keeping NEPA Current

On the Corps' web page, the Corps states, "Since 1980, operations have been modified and structural improvements for fish passage and temperature control have been implemented to address effects of the WVS on ESA-listed fish. NEPA[1] evaluations since the 1980 EIS have been project-specific. There is also new information relevant to the environmental impacts of operating the WVS."

I hope the Corps develops a strategy or plan so that changes to the operations, commitments & new listings under the ESA, addressing hazardous algae blooms (HAB) in many of the reservoirs that are also released downstream, etc., are vetted through the NEPA process and to the public before decisions are made and actions are taken, unlike what was done with the federal listing of fish under the ESA and changes in operations as a result of implementing the 2008 biological opinion (BiOp.)

If the Corps will take notice of Judge Simon's 2016 opinion and order on the Federal Columbia River Power System (FCRPS), Judge Simon noted, "… the … decisions of the Corps and BOR adopting and implementing the 2014 BiOp triggered those agencies' obligation to comply with NEPA."

With the WVS, we have a similar situation. The Corps engaged with the Services (NMFS and USFWS) and agreed to implement a BiOp in 2008. The decision of the Corps to implement BiOp changed the operations of the WVS significantly different than that described in the 1980 EIS, and the public was due outreach from the Corps and analyses of effects as required by NEPA before implementing the BiOp. If the Corps looks at the Council of Environmental Quality (CEQ) implementing regulation 40 CFR §1500.1 (b), it states, "NEPA procedures must insure that environmental information is available to the public officials and citizens before decisions are made and actions are taken." In this case, we as the public did not get our tax money's worth from the Corps when the Corps significantly altered its operations without a NEPA analyses and outreach to public officials and citizens.

I hope in the future the Corps keeps in mind CEQ regulation 40 CFR §1502.9 (c), "Agencies (2) Shall prepare supplements to … environmental impact statements if: (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts."

[1] NEPA is the National Environmental Policy Act.

Certainly the federal listing of salmonids and Oregon chum qualified as significant new circumstances bearing on the proposed action, and the changes to the operation and the proposed construction facilities identified in the 2008 BiOp qualify as substantial changes in the proposed action.

Again, please develop a strategy so this is not repeated in the future for this complex system

COMMENT TYPE: Opportunity/Solution – Keeping NEPA Current

I suggest all levels of management of the Corps at Portland District get some NEPA training.

COMMENT TYPE: Challenge – Cooperating Agencies

I see nothing on the Corps' website about possible decisions from cooperating agencies. Are there no cooperating agencies on this EIS development? Not even the USDOI Bureau of Reclamation (BOR) that has responsibility for the water behind the dam?

I suggest the Corps revisit this issue so as the taxpayers' don't have to review duplicate documents.

COMMENT TYPE: Opportunity – Costs of Operation and Mitigation

I hope the Corps lays out the cost of operating the WVS, including all the costs of mitigation for listed fish and the mitigation for the dams via fish propagation at the hatcheries. I think if we look at today's situation, the federal government might be operating a system that is no longer cost effective. Is there some other way to achieve flood control? If that could be resolved, we might be able to get rid of the WVS or portions of it, and its severely adverse effects to ESA-listed fish.

COMMENT TYPE: Challenge – Potential Violation of NEPA

While the Corps is developing this WVS EIS, it is also developing another NEPA document for another decision on the WVS. This project is called the Willamette Basin Review (WBR).

On the Corps' web page, https://www.nwp.usace.army.mil/willamette/basin-review/, the Corps and OWRD are developing feasibility study to determine if and how space in the reservoirs can be reallocated during the spring and summer to

provide stored water for municipal and industrial water supply, irrigation, and fish and wildlife uses.

I see this action as being premature and a waste of taxpayer money. We as the public, and likely the Corps as well, do not know the overall effects of operating and maintaining the system today. How can one understand this proposal in the WBS without understanding the overall effects of operating the WVS? Further, if the Corps looks at 40 CFR § 1506.1 (c) "While work on a required program environmental impact statement is in progress and the action is not covered by an existing program statement, agencies shall not undertake in the interim any major federal action covered by the program which may significantly affect the quality of the human environment unless such action:

> (1) Is justified independently of the program;
>
> (2) Is itself accompanied by an adequate environmental impact statement; and
>
> (3) Will not prejudice the ultimate decision on the program. Interim actions prejudices the program when it tends to determine subsequent development or limit alternatives."

Without an adequate and current EIS and ROD for the WVS, pursuing allocation of reservoir storage/water would prejudice any possible alternatives and decisions on the WVS. Further allocation cannot occur without the WVS operation and maintenance, and therefore is not justified independently of the WVS program.

Finally the draft feasibility study/EA for the WBR does not address HAB, which would occur under the authorized use of stream purification. Wouldn't reallocation affect how the Corps can address HAB situations?

COMMENT TYPE: Opportunity – Potential Violation of NEPA

The Corps, in cooperation with OWRD and BOR could take this opportunity in the development of this EIS to also study allocation as part of the water management. This will save the Corps on another NEPA process, the Services on developing additional biological opinions, the public time and money in project reviews, and taxpayer money.

COMMENT TYPE: Opportunity – EIS Baseline

What is the baseline as the Corps is actively modifying it under the Willamette Basin Review? Per the following statements made by Ms. Joyce Casey in the April 20, 2018, Columbia Basin Bulletin. "ESA requires agencies to be aware of, and consider, new information and changing conditions as that agency

implements a Biological Opinion... Therefore, we believe that reinitiating consultation is an appropriate action. The Corps remains fully committed to implementing the current BiOps while reinitiation is underway." Regarding the Willamette Basin Review, the same Corps website also states, “The Recommended Plan no longer includes leaving some storage space in joint-use; i.e., the recommended plan is to reallocate all of the conservation storage. The recommended allocation volumes are: 159,750 acre-feet of conservation storage for municipal and industrial water supply, 327,650 acre-feet of conservation storage for agricultural irrigation, and 1,102,600 acre-feet of conservation storage for fish and wildlife.” The Basin review would not be consistent with RPA measure 3 and possibly others by implementing this. Therefore, what is the baseline going into this EIS?

COMMENT Type: Challenge – Hazardous Algae Blooms (HABs)

I hope the Corps takes a hard look at this issue on the WVS. If subsequent analyses proves otherwise, we know these HAB thrive in warmer waters with increased nutrients. I suspect, for example at Detroit Lake, the nutrients are loaded into the lake from the increase in recreation use (summer boat use) and possibly the waste system of the cabins on the lake are contributing the nutrients needed for the HABs to grow in Detroit Lake. Therefore the impoundment leads to opportunities to provide the nutrients that help the HABs grow. Hopefully the

Further, I hope the Corps takes a hard look at the direct, indirect and cumulative effects of this issue, especially in light of climate change. It really is a bad situation when we can’t recreate on the lakes due to the harmful fumes of these HABs, and when the municipal areas downstream that use the Willamette River as their water source need to rely on bottle water when the HABs are sent downstream. Essentially, two of the authorized uses are not met when this situation arises.

COMMENT TYPE: Opportunity – Look at Other Ways to Meet the Project Purpose

Council of Environmental Quality (CEQ) regulation 40 CFR § 1502.14 (c) tells agencies that they shall, “Include reasonable alternatives not within the jurisdiction of the lead agency.”

I hope the Corps takes a hard look on how to meet the authorized project purposes without the use of the dams and their challenging effects on our precious. wild listed fish. I hope to see such an alternative as the Corps is one of the best engineering organizations in the nation.

COMMENT TYPE: Error on Listed Authorized Use

The poster boards for the meeting show navigation as being an authorized purpose, but this is no longer the case according to the draft feasibility study/EA for the Willamette Basin Review. In this draft feasibility study/EA, the Corps states, “Navigation was an authorized purpose of the WVP, but due to a lack of commercial navigation traffic in the upper Willamette River, the WVP was de-authorized for navigation by the Water Resources Development Act of 1986. Reservoir discharges are no longer regulated for navigation above Willamette Falls Lock.”

In addition to making this correction, I see the Corps is pursing the EIS with all of the authorized project purposes. Will the project need be to meet these authorized purposes?

COMMENT TYPE: Issue/Concern – Sites with Hazardous Materials on the WVS

I understood when I worked for the Corps that there are many hazardous materials in the WVS from when the dams were constructed. It would be nice to know where these sites are and how the public is protected from them – either by direct contact or through inadvertent downstream release.

COMMENT TYPE: issue/Concern – Safety of Dams on the WVS

I hope the Corps shares what the safety ratings are for each of the dams, and what those ratings mean.

6/4/19 massive shoreline erosion & damaged revetment

Bill
Land
541-
968-
9766

1"= 100'

DATE: June 21, 2019

TO: Suzanne Hill, EIS project manager, U.S. Army Corps of Engineer

REGARDING: The US Army Corps of Engineers request for comments in preparation of an Environmental Impact Statement, (EIS) on the Willamette River System.

FROM: Sam Sweeney – Family farmland owner, Willamette River Floodplains

1070 Ferry St.

Dayton, OR 97114

Dear Susan Hill,

Please accept and consider the following comments in the CORPs preparation for the Environmental Impact Statement, (EIS) for the "continued operations and maintenance of the Willamette Valley System".

Our family owns and farms land in the Willamette River Floodplains in the Yamhill County near Lambert Bend, (RM 64) on the Willamette River. We have witnessed the floods of 1996 and 1997 destroy farmland through bank erosion and river capture. This year the flood in April caused scouring and the access road to the adjacent farmland was almost eroded away. It is evident, even to a casual observer that this area will experience even more severe and significant river capture effecting farmland up and downstream from this site during future flooding events.

In recent correspondence with Ed Weber, a retired employee of USDA NRCS and also Oregon Department of Agriculture (ODA); he said that damaging flooding events could be reduced by cooperation and the sharing of up to date collected data between federal agencies. Ed's lifetime career was in natural resources and while at ODA, he did an erosion analysis of the Willamette River System and published his findings in a book called: "Willamette River Erosion Analysis Project"

While at NRCS, Ed gained extensive experience in gathering stored water accumulations from snowtel sites that were used to predict water runoff within the Willamette Basin. Ed said this program has been used since 1934 and has a high 90% + accuracy rate in predicting a current year's water runoff.

From his correspondence, it is my understanding that the CORPS uses a management tool called the “Rule Curve” required by congregational law to manage the reservoirs and downstream releases. It would be an advantage if the law was amended to allow reliable use of local real time data that would assist the CORPS to “fine tune” management decisions regarding storage and downstream releases.

This would certainly help in situations where flows and flow conditions to not match long term averages. Having management flexibility will be even more important in the future since It is predicted that climate change will cause even more erratic fluctuations in weather patterns.

As mentioned before, our family is a landowner in the basin that is affected by damaging floods. Therefore, I strongly urge the CORPS in planning future “Continued Operations and Maintenance of the Willamette Valley System” to take the necessary steps to develop working relationships with other federal and state agencies that would result in the sharing of up to date information. I also encourage the CORPS to use the latest up to date technical tools that would result in better management of the water in the Willamette Basin. Using reliable current data and tools is absolutely critical in managing the water resources that the basin citizens depend on for their needs.

Sincerely,

Sam Sweeney

1070 Ferry St.

Dayton, OR 97114

sweeneyfarm@aol.com

fn: YS&WCD 2019-5-A

John Zielinski
Name (First, Last)

Marion County Farm Bureau
Organization

Salem OR
City, State

john@ezorchards.com
Email

☐ Please check if you would like to receive email notifications about this project.

Comment(s). Please use this space to provide comment(s) to the Corps.

Will the TMDL be a part of the EIS, if ag land has increased flooding it would stand to reason that there would be increased mercury deposits. With a changing climate the need for water is increasing. I would like to see the Allocation for Ag to be higher than the current 327.5 ## Acft.

Bank erosion is an issue for many farmers with property bordering the Willamette

PUBLIC COMMENT PERIOD CLOSING DATE: JUNE 28, 2019

Doug Heiken
Name (First, Last)

Oregon Wild
Organization

Eugene, Oregon
City, State

dh@oregonwild.org
Email

☒ Please check if you would like to receive email notifications about this project.

Comment(s). Please use this space to provide comment(s) to the Corps.

Remove revetments where possible. Let river dynamics happen.

Remove weeds on banks & gravel bars & islands, manual removal and maybe using high flows

Does Dexter need ~~maybe~~ better upstream fish collection?

Enhance system for lamprey conservation/restoration.

Adjust system to conserve/restore freshwater mussels, turtles, macroinvertebrates.

Land acquisition in floodplain to allow avulsion, river migration. river otters, salamanders, frogs

Don't let water reallocation process limit options for conservation.

Favor native fish over hatchery fish.

PUBLIC COMMENT PERIOD CLOSING DATE: JUNE 28, 2019

KRISTIN, KESSLER
Name (First, Last)

Organization

EUGENE, OR
City, State

KRISTINKESSLER+18@GMAIL.COM
Email

☐ Please check if you would like to receive email notifications about this project.

Comment(s). Please use this space to provide comment(s) to the Corps.

I THINK THAT ~~SMOOTHBEED~~ SPECIES SHOULD TAKE PRECEDENT OVER OTHER MISSIONS IN THE WVS. I THINK THAT CREATIVE SOLUTIONS FOR ISSUES LIKE FLOOD CONTROL SHOULD BE CONSIDERED FOR THE SAKE OF MAKING RADICAL CHANGES TO THE SYSTEM THAT WILL SERVE ENDANGERED SPECIES. SOLUTIONS LIKE RECONSTRUCTING FLOODPLAIN SYSTEMS THAT INCREASE FLOW AND SERVE OTHER ECOLOGICAL SYSTEMS SUCH AS THE DELTA PONDS PROJECT IN EUGENE AND THE USE OF NATIVE GRASSES FOR FLOOD MITIGATION. WITH GLOBAL BIODIVERSITY DECREASING, THE WILLAMETTE VALLEY NEEDS TO DO ITS PART TO PRESERVE ITS NATIVE SPECIES.

PUBLIC COMMENT PERIOD CLOSING DATE: JUNE 28, 2019

Richard D Brust, MD
Name (First, Last)

Eugene Yacht Club
Organization

772 W. Craven ST
Monmouth, Oregon, 97361
City, State

Thank you for Having the Public Have meetings.
Email

It was very Nice Meeting & Talking to So Many Representative of the Corp.

☐ Please check if you would like to receive email notifications about this project.

Comment(s). Please use this space to provide comment(s) to the Corps.

My Concerns & Suggestions have to do with Fern Ridge Resivior. It would be nice if you can extend the use of FRR by altering The guidelines for Filling & withdrawals to extend the use of Fern Ridge a month of March & October.

My concern is that the Corp of Engineers are unaware of the impact that FRR has on the Mental Health and Recreation that Fern Ridge provides for the largest number of people; it being the only Resivior close to a major population center. Fern Ridge Provides The best Sailing Venue in Oregon and possibly the West Coast for Major small boat National Regattas including Thistles, Santana 20, Lido 14, Day sailers, Snipes and others. As the growth of Sailing, Rowing Kayaking, Paddleboards, fishing, bird watching grow, the Ability to access Fern Ridge water provides a greater Health, and well being for the greatest number of people. One half of Fern Ridge water is in the Top 3½'. By adjusting this 3-3½' still Provides access to the water for an extended use of this major facility.

Thus I would suggest you consider the potential of extending the season's usability by modifying the guidelines and allowing for more human input and judgment.

Respectfully / Richard D Brust

PUBLIC COMMENT PERIOD CLOSING DATE: JUNE 28, 2019

Scoping comments for Willamette System Environmental Impact Statement

Att: Suzanne Hill and to whom it may concern, June 28, 2019

It is well established that major changes need to take place in order for us to restore the Willamette Valley fisheries to their original population levels. The greatest barrier to our fish populations is the existing dams in the Willamette Valley. To be clear, I am NOT recommending the removal of any existing dam.

First some observations:

1. Variation in Dams: The taller the dam, the greater challenge due to the basic laws of physics. More specifically, the taller the dam, the greater pressure changes fish experience as we force them into human constructed devices attempting to move them downstream. And from your experiments, (this has been thoroughly tested) the variety of transporting devices result in low survival rates.

The location of the dam relative to the overall watershed impacts fish migration and influences big-picture outcomes as we move forward with mitigation. For example, choosing a dam location for a successful mitigation device or campaign will have a greater overall affect when positioned furthest from the ocean versus a dam located closer to the ocean. By choosing a dam site furthest upstream, we will provide more opportunities for fish to exploit other nearby habitat, e.g. small streams and slack water areas, thereby increasing overall density and diversity in the population.

2. Temperature: The immediate response of fish returning to the base of Cougar reservoir was phenomenal. This response is clearly an unquestionable correlation/causation event regarding the temperature selection facility installed on the dam. We need to capitalize on this relationship to restore fish populations. However, the cost was over priced due the overbuilt design and unnecessary features. I talked to the owner of the construction company who did the remodel. He suggested focusing on shorter dams and simply using prefabricated siphon tubes that could be trucked onto the sites in two or three pieces and bolted together to lay over the inclined spillway to reduce costs. (More on this topic in the discussion below…)

3. Early historical fish introduction: Salmon fingerlings were introduced into Cottage Grove and Dorena reservoirs back in the 1980's. Regardless of the high mortality rate caused by the existing primitive outlets on the dams, salmon survived and continued to return to the base of these dams for several years causing 'Shoulder-to-Shoulder' fishing along the base of these reservoirs. Salmon continued to return into the early 90's but slowly dwindled due to lack of upstream passage (and other negative river qualities such as temperature, etc.) I've had countless conversations with local individuals who remember these events. Fact: The planted fish returned.

4. Recent fish introductions: Five or six years ago (?) salmon fingerlings were released in a variety of locations near the vicinity of Dorena and Cottage Grove

dams. This time, the response was different as the fish were released below the reservoirs in areas not near the dams to prevent fish from congregating at the base of dams. Initial fishing reported catching large native (unclipped) Steelhead in large quantities in a variety of different areas. One such (unclipped) fish was presented to a local meeting of the Coast Fork Watershed group. The Steelhead occurrence was explained by their feeding on the recently released fingerlings. This outcome was not surprising and clearly shows if we have proper habitat conditions, fish populations (some more than others?) will prosper.

5. Listing of historical costs(?): In the vicinity of $10 million has been spent over the last two decades on the renovation of the gravel ponds near Valley River Center in Eugene, Oregon. Another $3 million (?) spent on a side canal of the Willamette River for fish habitat improvement and replenishing an aquifer for Springfield's drinking water wells. The final cost of the temperature selection valve on Cougar Reservoir was astronomical (~$30 million+?). The research costs of trying to determine the survival rate of downstream passage from Detroit Dam is still ongoing(?). Lots of additional examples exist.

Proposal:

Short term:

1. Expand temperature control on smaller dams in the upper reaches of Willamette River watershed. For example, temperature data and ongoing monitoring already exist for Dorena reservoir. At this location, temperature impairment has been identified to occur during specific short time periods where the needed outflow for flood management is relatively low (~ 100 cfs) and therefore, could be handled or corrected by a small-scale siphon device.

This would be a keystone game-changing event. Correcting the temperature of a dam's outflow would synchronize the flora/fauna cycle to match the life cycle of the native fisheries. It's no mystery that ODFW salmon traps catches very few salmon when placed at the confluence of the Coast Fork of the Willamette and Row River. The extreme temperature fluctuation that exists in this area, causes premature fish egg development followed by lack of insect and other food sources due to abnormal stream temperatures.

I would like to think that I'm 'preaching to choir'. You know the results of temperature management by the fish response at Cougar Reservoir. (Note: watch the episode on 'Oregon Fieldguide' titled "Hot Fish, Cold Fish" and look at the state employees' faces as they describe the fish response,)
https://www.opb.org/television/programs/ofg/segment/hot-fish-cold-fish/

All future funding should be dedicated to correcting water temperature outflow from all dams starting with the most upstream locations. Appropriate sized siphons need to be constructed avoiding the design flaws/extra costs that occurred at Cougar Reservoir. For example, paying for a costly (stainless steel) valve design that allows for any depth of water selection when you are only going to select from a few know depth locations is completely unnecessary. This will

substantially lower your construction costs. Since you will only need this during specific times of the year that are not during the typical winter/spring high flood management events, the siphons can be smaller and will not impede Corp's control of water at critical times.

Also, if these devices are prefabricated and transported to the dam site lowered into place, you will avoid the cost of clearing out the drain at the bottom of each dam (approximately $19 million for Cougar reservoir?) and the subsequent washing down toxic sediments as you drain the reservoir to build a separate temperature selection unit/tower. This is what occurred at the Cougar dam site. Hmmm….Have I left anything out…? Perhaps there are more cost saving that could implemented?

Note: There would be a 'domino-affect' when a dam's outflow temperatures begin to approach optimal conditions for fish habitat. Nearby streams would not be overshadowed by the dam's incorrect temperature regime. For example, Mosby Creek which is located downstream of Dorena dam is masked by the larger volume of colder water being released from Dorena during the summer months. As we know, fish will not enter a stream when temperatures are not within a specific temperature range. We know this by observing fish at the mouth of the Willamette and our experience of the outflow of Cougar Reservoir prior to the installation of the temperature selection gates.

This is just one example, what about all the other side creeks downstream of all the dams? This leads us to the next suggestion.

2. Pay landowners to improve riparian habit. First step is offer seminars on proper land management for fish habitat. Pay for their attendance. Second step offer additional financial incentives to allow riparian habitat to naturally reestablish. Next level of incentives is to pay those landowners for additional efforts to enhance riparian habitat, e.g. tree planting, etc. This could be monitored by drones and/or satellite mapping, etc. Before and after pictures could be used to verify/quantify habitat improvements and subsequent payments to landowners. Offer recognition awards to those owner who go the extra mile, etc. Cost is probably less that $150,000 and well worth it.

3. Fund science educational field trips at local schools and follow up with examples of other school programs that have demonstrated success with improving fish habitat. Provide schools with fish aquariums to raise and release fish in local streams.

Long term:

1. Create an endowment for property acquisition that is funded by placing a 1% surcharge on all habitat enhancements regardless of the funding source. This fund is for the sole purpose of purchasing streamside property from all sources; timber companies, land owners, municipalities. It is not to be used by watershed groups. This is about non-partisan land procurement facilitating future

generations toward habitat protection. Its focus should be on the headwaters of all major tributaries in the Willamette Valley Basin.
2. Coordinate with ODFW to study the impact of algae blooms by radioactive isotope tagging of fertilizer used by timber growers to track nutrient flow into reservoirs. This will take us to the next level of water quality as the fish populations return.
3. Stop the flow of mercury into Dorena and Cottage Grove reservoirs by limiting logging in areas of high mercury concentration within the soil substrate. This will allow more individuals to enjoy our natural fisheries without the concern of mercury poisoning. Also, this will allow Oregon DEQ to uphold its promise to Native Oregonians that mercury concentrations will be reduced allowing native cultures to consume a traditional higher fish diet. (Note: last major flood event from Dorena shows DEQ's annual mercury estimate transporting through the Dorena dam actually occurs in 36 hours. I have other data sets showing the same results.)
4. Coordinate with NOAA to track salmon migrating to the ocean to determine 'what, where, when, and why' about their ocean habitat. What are the food sources of Salmon while in the ocean? If they rely on young herring, it's not going to be pretty. (Will their food source go away like the sardine?) Permitted catch of herring in southeast Alaska has gone from 220,000 metric tons to less than 1000 metric tons over the past two decades. This year they closed the season because insufficient numbers. So, we could do everything just perfect and the salmon will die in the ocean due to lack of food or what?

Summary:

We all wait for a fish passage solution for the 13 dams located in the Willamette River Basin. For now, we need to take a step in the direction of rebuilding the entire river basin habitat to protect fish populations before they disappear completely. By not addressing the temperature impairment of our rivers, our waterways contain a limited number of acceptable habitats and, at the same time, contain a high density of predators at those few locations. (Think Valley River ponds in Eugene, Oregon). Even if we developed a fish passage device that achieves a 45% survival rate, would this be enough to sustain our fish populations? Could they survive their developmental stages with limited access to quality habitat? My position is they would not survive.

The clock is ticking. The longer USACE procrastinates on improving fish habitat and fish passage, the harder it becomes to stop our salmon's downward spiral toward extinction. Get on with it!

John Steele
Former chair of the Row River Watershed Group
34882 Spillway Rd
Cottage Grove, Or 97424
nonstopchange@gmail.com

Addendum to John Steele's comments for the Willamette System Environmental Impact Statement.
June 28, 2019

Att: Suzanne Hill and to whom it may concern,

If it's possible, I would like to submit an additional page/statement to my original document that was submitted earlier today. If this causes complications or is not permissible, then I would request that this addendum be omitted and my original 4 page document stand as my submitted comment.

Additional observation:

6. There's an elephant in the room. There seems to be a credibility issue with the USACE regarding meeting environmental standards when it comes to fish passage. For example, how can a $24 million hydroelectric plant be built in the Willamette River Basin and not include any fish passage? I'm referring to the Dorena Hydroelectric project.

Initially, it was described as ~$9.3 million project on paper and ends up costing around $24 million with no fish passage. All through the initial stages the builder complained about how the project could not afford the cost of adding fish passage of any kind. Meanwhile, they had not legally acquired any contractual agreement with any profit or non-profit electrical company to purchase the produced power. So, they ended up spending $870,000 to bury a 6.5 mile underground power line to sell the power to Pacific Power.

During construction, the USACE agrees to enter a 'working agreement' with the builder/owner to always "work-out" any conflict through negotiations? Did the owner/builder abuse this working agreement? Was the relationship with the builder/owner more important than a working agreement with the people who live and work around Dorena Reservoir?

The list of questions goes on and on regarding the Dorena Hydroelectric project. How could this hydroelectric project be built without any fish passage?

Once again you're asking for comments regarding fish habitat, who are you going to listen to now…?

John Steele
Former chair of the Row River Watershed Group
34882 Spillway Rd
Cottage Grove, Or 97424
nonstopchange@gmail.com

Name (First, Last)

Organization

City, State

Email

☐ Please check if you would like to receive email notifications about this project.

5/4/19

Comment(s). Please use this space to provide comment(s) to the Corps

Piney Rd Water Control Sub District started in 1967

5 on levied board

9 revetments no funding for repairs/replacement

John Bryce, Board president

Bryan @ harpers. farm 30-74-7 Long Pine Levee Jx city

- any data for history of revetments
- historic survey 1890

Navigation 22 1964

Harper Extension 1935 expanded 1958

1960 Jx City

1960 Knox revetment

1963 Knox extension

1963 Marshall Island

1960 Below (two sites are upstream of Knox)

1974 Lassen

1955 Location of downstream extension

List of affected revetments - damage & levee location

USACE

Notes taken by Wendy Jones, Natural Resource Manager

PUBLIC COMMENT PERIOD CLOSING DATE: JUNE 28, 2019

Online Public Comment Portal Comments

Comment Name	Location for Comment	Organization	created_date	Comment Type	Description (1000 Character Limit)
Detroit Dam Reservoir - Water Levels	Detroit		5/21/19 16:59	challenge	The solution to algae blooms and warm water behind the Detroit dam is rather simple. Allow the dam to hold back water so the reservoir fills. Today the Army Corps allows to much water during the winter and spring months to spill out of the dam. If there is more cold water algae blooms will either not happen or will be much less than they are today. I remember fishing at the reservoir in the 1960's and 1970's when the reservoir was full and algae blooms were a periodic small nuisance. If the water is cold algae is less active, if there is a full reservoir the dilution of an algae bloom is greater. The rules that require the Corps to dump water need to be changed to support human health, fiscal responsibility and store more water behind the Detroit dam. The proposed project costs to much money and will in the end result in more damage to the regional environment.
Fern Ridge Recreation	97448, Junction City, Oregon	Eugene Yacht Club	6/5/19 21:15	opportunity	I only wish to ask the USACE, as it undergoes the EIS process, to not undervalue or underestimate the recreational opportunities at projects such as Fern Ridge which are close to the growing population bases in the Willamette Valley. This probably amounts to several hundred million dollars. Recreational access also needs to be adequate to the types of needs and to be safe.
Below Reservoir Recreational Flows	97448, Junction City, Oregon		6/14/19 3:05	opportunity	Below Fern Ridge Reservoir there is a small drop structure at Kirk Park. For over a decade the feature that this structure creates (when the flows in the Long Tom river are just right) has been a local resource for whitewater paddlers to surf. It's a great spot for beginners, safe, reliable, predictable and the access is easy via the park. Unfortunately, the range of flows where this feature is usable is narrow (`900-1500 cfs). These flows only occur during the fall draw-down at fern ridge. They are also highly unpredictable on how long it will be "in," and usable. I would like the corps to consider this established downstream recreation opportunity when planning the flow curves for the Long Tom during draw down. Ideally, the duration of the ideal flow range would be maximized over the course of the draw-down to create the most boatable days at this spot. Additionally, I'd like the corps to consider some scheduled "release days" during the summer for whitewater paddlers to be able to plan for recreational releases. Even one weekend a summer would be a great boon to the local paddling community. Kayaking is a more accessible recreation activity in terms of cost than lake boating and some predictability of flows and consideration of paddlers could create additional opportunities to expand the user group locally. See attachment on next page.

Attachment from Comment Name "Below Reservoir Recreational Flows"

Attachment from Comment Name "Below Reservoir Recreational Flows"

Attachment from Comment Name "Below Reservoir Recreational Flows"

Online Public Comment Portal Comments

Additional Features for Whitewater Paddlers	97448, Junction City, Oregon	1982	6/14/19 3:13	opportunity	I'd like the Corps to consider the addition of recreation amenities for whitewater paddlers that would include the construction of additional features in the Long Tom channel that would accommodate use at a wider range of flows. The current structure that incidentally supports use as a whitewater feature is only usable during a narrow range of flows (900-1500 cfs). While it's understood that this is not the intended function of this structure, it's value as a local resource is significant among the paddling community. There is an opportunity for the Corps to consider constructing additional structures that would be usable at both lower, and higher flows. The presence of additional features here would make the site usable for paddlers more than a handful of days a year during draw down, and create opportunities for use at winter's higher flows, as well as lower flows. While I'm unsure of national examples of USACE projects to create these kinds of in-water amenities for paddlers, there are numerous examples of these kinds of projects being done in USACE partnership.
Adjust Draw Down Flow For Whitewater Paddling	97424, Cottage Grove, Oregon	1982	6/14/19 3:18	opportunity	During the fall draw down, the corps should consider a flow curve in the lower Row that supports ideal flows for whitewater paddling. The lower Row is an exceptional local resource for beginner to intermediate paddlers and is often many local paddler's first Class III whitewater. A predictable flow schedule within safe boatable ranges would be ideal build some certainty into the opportunities available for local paddlers. Additionally, one or two planned summer releases for local paddlers would be a huge value to the local community and add to the summer recreation opportunities available that support the local economy.
Optimize Botable Flows at Fall Draw Down	Big Fall Creek Rd, Fall Creek, Oregon, 97438		6/14/19 3:21	opportunity	During the fall draw down, the corps should consider a flow curve in the lower Fall Creek that supports ideal flows for whitewater paddling. Lower Fall Creek is a great beginner run and usually has a pretty short window of boatable flows during the fall draw down. A flow curve that optimizes fall draw down flows for whitewater recreation would be ideal for local paddlers.
Improve Boater Access to Middle Santiam	97329, Cascadia, Oregon		6/14/19 3:26	challenge	Access to the Middle Santiam below Green Peter reservoir has been complicated by inconsistent feedback from local law enforcement and a lack of clear signage/amenities on how boaters can legally and safely access this stretch of river. The Middle Santiam between Green Peter and Foster is an exceptional summer resource during power generating releases and one of the few consistent intermediate/advanced whitewater opportunities during the summer in the Willamette valley. Improved or clarified access would improve use.
Fall Draw Down Schedule for Whitewater Kayaking	97329, Cascadia, Oregon	1982	6/14/19 3:28	opportunity	Scheduling a fall draw down in such a way to optimize flows for whitewater paddling, or at least communicating the draw down schedule and plan, will support the ability of local paddlers to be aware of and plan for access to this local resource.

Online Public Comment Portal Comments

Improve Recreational Access to Lower Long Tom	97333, Corvallis, Oregon	1982	6/14/19 3:30	opportunity	Improved access to the lower Long Tom river will improve recreational opportunities for upstream communities and clarify/formalize access points to this local resource for canoeing, paddle boarding, fishing, etc.
Optimize Draw Down Flows for Whitewater Recreation	97413, Blue River, Oregon	1982	6/14/19 3:33	opportunity	Optimization and scheduling (and improved awareness) of fall draw down to support whitewater paddlers on the lower river would support access and use of this resource for intermediate paddlers.
Review USACE Revetments on Amazon Creek	Eugene, Oregon	Long Tom Watershed Council	6/14/19 3:43	resource	Habitat value of Amazon creek diversions and opportunities for resource enhancement (if any) through a more naturalized channel should be evaluated
Boater Accesses	97329, Cascadia, Oregon		6/14/19 4:05	other	This runs only safe access point puts you fairly close to the dam. Ive heard other boaters having the cops called on them by employees at the facility. It would be nice if boaters could have a designated access point.
More Ideal Flows	35235 Row River Rd, Cottage Grove, Oregon, 97424		6/14/19 4:10	other	Would be cool if draw downs took boat-able flows into consideration.
Whitewater draw down of Dorena Lake	97424, Cottage Grove, Oregon	University of Oregon	6/14/19 16:33	opportunity	Please consider improving whitewater flows during the fall draw down of Dorena Lake. The lower Row provides excellent whitewater opportunities to recreational boaters in the Willamette Valley. Summer whitewater releases would also benefit the paddling community and the economy in the surrounding communities.
Fern Ridge Outflow Recreation	97448, Junction City, Oregon	University of Oregon	6/14/19 16:38	opportunity	There is a small whitewater feature below the Fern Ridge Dam that is usable in the narrow range from 900-1500 CFS. This is a great & safe spot for beginners to advanced boaters. Please consider adjusting fall draw down schedules to increase whitewater paddling opportunities. Additional scheduled recreational releases, especially during summer months, would also be very beneficial.
Eugene/Springfield whitewater feature	Alton Baker Park	University of Oregon	6/14/19 16:46	opportunity	Please consider developing a whitewater feature either along the Willamette River in the Eugene/Springfield area, or along the canoe channel that runs through Alton Baker Park. Similar parks have proved beneficial to the local economies of towns across the nation. The whitewater parks in Bend and other locations have contributed to thriving whitewater and river surfing communities, and have more broadly contributed to the attractiveness of these towns as places to live and work. Further, increased recreational activities in the parks area will increase the safety of all parks users by increasing the number of park users, thereby reducing the vulnerability of individuals using the park alone.

Online Public Comment Portal Comments

Public Hazard	Western, Eugene, Oregon	Willamette Kayak and Canoe club	6/14/19 21:06	challenge	For many years, rip Rap and historic weirs have blocked passage and flow just upstream of the current I-5 freeway bridge over the Willamette. This man made debris creates a navigation and recreational hazard for river users at at a popular section of the river in the Eugene/Springfield area. Many rescues have been required over the years by individuals and the sheriffs Marine Patrol. It is also a ecological disruption interrupting the natural flow of the river. Cost of remediation and mitigation would be inexpensive since it involves removal rather than installation of man-made material. This hazard is blatant, dangerous and conspicuous in regards to current management practices. Someone will die here if nothing is done.
Jesse Nicola	97342, Detroit, Oregon		6/19/19 7:05	opportunity	Please consider summertime weekend releases in late July through August for the North Santiam. Other rivers become low during this time, and having additional water in the Santiam would help provide for whitewater recreation and bring more people to that area as well providing economic opportunity.
Green Peter to Foster Lake access	97329, Cascadia, Oregon		6/21/19 16:03	challenge	I would urge the Corps to take steps to improve access to the short, 2-mile stretch of whitewater between Green Peter Dam and Foster Lake. This stretch of river is high-quality, class IV whitewater that is good for intermediate paddlers. The current problem is two-fold: (1) the local sheriff has prevented some kayakers from accessing the river, and (2) the access to the put-in is difficult. I would urge the Corps to communicate to the local sheriff that this activity is permitted. Second, I would urge the Corps to allow kayakers to park closer to the put-in, and provide a small stairway down to the water so that we don't have to climb over railing to reach the river.
Bank erosion	97026, Gervais, Oregon	Marion County Farm Bureau	6/21/19 23:00	challenge	In the past there were sloped banks on this section of the Willamette, when water levels were high the water would rise up the slope and then flood out onto the plain. Now there is bank erosion that puts more sediment in the river, erodes the bank taking farm land, and can potentially change the course of the river.
Junction City Water Control District	97448, Junction City, Oregon	Junction City Water Control District	6/24/19 18:14	resource	Agricultural Issues with River Levels and Stream Flows (stored water/irrigation)
floodplain and side channel habitats	97333, Corvallis, Oregon		6/27/19 17:07	resource	The Corps should look for opportunities to increase the frequency and duration of inundation of floodplains and side channels to provide refugia and foraging habitat for native fish, including ESA listed species. Initially flows could be prescrined to inundate low elevation floodplains that have the least impact to private property. In the longer term the Corps should work with the greater conservation community to identify locations where additional inundation would proved fish and wildlife benefits and consider voluntary property acquisitions working with non-profit and state partners.

Online Public Comment Portal Comments

Winter flows	97448, Junction City, Oregon		6/28/19 0:33	resource	Manage winter/early spring releases to increase river-floodplain connectivity. Increase inundation frequency and duration of floodplain habitats that provide more productive, lower velocity habitats for juvenile native fish. Increasing winter/early spring flows would also address natural river processes that increase sediment mobility, river corridor disturbance to restore riparian vegetation and geomorphic processes.
Habitat restoration and land acquisition fund	97448, Junction City, Oregon		6/28/19 0:39	opportunity	Establish a funding program to support habitat conservation, land trust support for purchasing conservation properties, and replacing river training infrastructure that limits river-floodplain connectivity. Conservation organizations have purchased and restored properties throughout the mainstem Willamette River. As the valley develops, habitat will continue to be converted for agriculture and residential/commercial/municipal development. River corridor should be prioritized for purchase. Existing developed properties in key locations could be restored to enhance habitat and reduce flood risk to other properties.
Revetment replacement cost share program	97448, Junction City, Oregon		6/28/19 0:48	opportunity	Develop a cost share program to repair and replace stone revetments on the Willamette River and tributaries. As revetments age and fail, landowners are likely to rebuild revetments with stone. Repairs offer an opportunity to enhance river channel, bank, and upland habitats with bioengineering. Providing a cost share program would improve habitat conditions and river corridor functions. The program could also support revetment modifications to increase river-floodplain connectivity. Examples include removing/replacing undersized drainage culverts, removing relict revetments, and reconnecting blocked side channels and other floodplain habitats.
Cougar Dam - Run of River Operation	NF-1993, Blue River, Oregon, 97413		6/28/19 0:55	resource	Develop upstream fish passage strategy and operate Cougar Dam as a run-of-river reservoir to promote downstream passage of juvenile salmonids. Investigate similar opportunities for Blue River and other facilities.

Online Public Comment Portal Comments

Fish Passage in the Middle Fork Willamette	97431, Dexter, Oregon	Middle Fork Willamette Watershed Council	6/28/19 21:03	resource	Fish passage in the Middle Fork Willamette Watershed remains the primary obstacle for endangered fish species recovery, as well as the sustainability of other aquatic species. Successes at Fall Creek with the new fish collection facility for upstream transport, as well as the drawdown for downstream fish passage, show that this issue can be addressed with ingenuity and even nontraditional approaches. The MFWWC and partners have been investing significant resources in restoring floodplain habitats in the Upper Middle Fork Willamette Watershed (e.g., Staley Creek, Coal Creek, Indigo Springs, etc). Upper Willamette River spring Chinook salmon are listed as threatened under the Endangered Species Act, and the Middle Fork population is considered a core genetic legacy population (Upper Willamette Chinook and Steelhead Recovery Plan (ODFW, NMFS 2011)) in the basin. Historically 20% of the Willamette Basin's spring Chinook run returned to the Upper Middle Fork Willamette River (approximately 2,500 fish) (Upper Middle Fork Willamette Watershed Action Plan 2009). With our partners, we are observing near-immediate positive responses from our river restoration efforts in terms of fish response once habitats are created. We believe that if fish passage is addressed throughout the Middle Fork Willamette Watershed, significant gains can be made not only for listed species recovery, but for the prevention of listing of other species such as Pacific lamprey in the future. Upstream and downstream passage at Hills Creek, Lookout Point, and Dexter will be critical for sustaining successful populations of spring Chinook, steelhead, Pacific lamprey, and bull trout.

Rule Curve / Flow Release Timing	97431, Dexter, Oregon	Middle Fork Willamette Watershed Council	6/28/19 21:06	resource	Flows in the Middle Fork Willamette or are severely departed from historic conditions in order to meet congressionally approved rule curves. The rule curve scenarios are dated and pose not only a risk to aquatic ecosystem health and recover, but also may pose a risk to human populations. The effects of climate change and future precipitation scenarios should be considered for flood risk mitigation as well as effects on fish species life stages and the creation and maintenance of dynamic aquatic habitats. Floodplain restoration downstream of ACOE dams is very difficult to address within the current rule curve operational framework. In functioning ecosystems floodplain habitats are created and maintained through natural disturbance processes such as flooding, sediment mobilization and transport, landslides, etc. In the absence of these natural processes, floodplain features often become stabilized, disconnected, vegetated and no longer serve their ecological function. Functioning floodplains are important for both endangered species recovery and protection of downstream communities located within the built environment. We recognize the functions the dams provide in terms of flood-risk management to Oregon residents and communities, but believe there are more tolerances and innovative approaches to dam release and timing that would be specifically targeted to bolster floodplain restoration, creation, and function, especially within the Middle Fork Willamette. The existing body of data from USGS, ODFW, and others could assist in the re-evaluation of the existing rule curve and flow release timing, such as: Wallick, J.R., Bach, L.B., Keith, M.K., Olson, M., Mangano, J.F., and Jones, K.L., 2018, Monitoring framework for evaluating hydrogeomorphic and vegetation responses to environmental flows in the Middle Fork Willamette, McKenzie, and Santiam River Basins, Oregon: U.S. Geological Survey Open-File Report 2018–1157, 66 p.,
Revetments/Levees	97431, Dexter, Oregon	Middle Fork Willamette Watershed Council	6/28/19 21:08	resource	Existing revetments/levees in the Middle Fork Willamette prevent access to, and function of, floodplain habitats. We encourage the ACOE to consider working with partners and land managers to consider if some of these revetments could be decommissioned & deauthorized in areas where there is no risk to life, significant infrastructure, or private property. Additionally, we suggest a streamlined 408 process. In some cases, decommissioning levees could result in a positive benefit for both endangered species through habitat creation and downstream communities through flood-risk mitigation.
Restoration	97431, Dexter, Oregon	Middle Fork Willamette Watershed Council	6/28/19 21:10	opportunity	The MFWWC is grateful to ACOE partners who are actively working with us to jointly plan and implement habitat restoration projects in the Middle Fork Willamette Watershed that benefit both species and communities. We hope that this partnership will continue in the future.

Temperature	97431, Dexter, Oregon	Middle Fork Willamette Watershed Council	6/28/19 21:12	challenge	Temperature downstream of large dams in the Middle Fork Willamette remains a challenge for migration timing, as well as pre- and post-spawning mortality of ESA-listed species. We encourage the ACOE to continue to consider innovations around flow releases and timing to attempt to mimic historic temperature conditions as much as is practically possible. Other management strategies (floodplain restoration, revetment/levee removal, and flow release timing) may also address temperature issues.
General - Middle Fork Willamette	97492, Westfir, Oregon	Middle Fork Willamette Watershed Council	6/28/19 21:13	opportunity	Many state, federal, and private partners are working diligently to restore habitats and function in the Middle Fork Willamette Watershed. Without the participation and partnership of the ACOE, many of these projects can't and won't achieve their full potential. We recognize the often times conflicting purposes that the ACOE has to manage for within the Willamette Project, yet we encourage the ACOE to continue to actively work with us on these issues so that we may all achieve our goals.

Attachment K: Supplemental Environmental Impact Statement Notice of Intent

rotational basis at various training areas, including KTA, Poamoho, and MMR.

Located in northeast Oʻahu, KTA has been the site of military training since the mid-1950s. Current training activities on State-owned land at KTA include high-density, company-level helicopter training in a tactical environment, large-scale ground maneuver training, and air support training.

Located on the western slopes the Koʻolau Mountains in north-central Oʻahu, Poamoho has been the site of military training since 1964. It provides airspace with ravines and deep vegetation for realistic helicopter training.

Located in northwest Oʻahu, MMR has been a military training site for nearly 100 years. Tactical training at MMR began in 1941 after the attack on Pearl Harbor and military use continues to this day. Current activities on State-owned land at MMR include maneuver training, the use of restricted airspace for unmanned aerial vehicle training, as well as wildland fire suppression and security activities.

The Army published a Draft EIS on June 7, 2024. Native Hawaiian Organizations, Federal, State, and local agencies and officials, and other stakeholders were invited to participate in the public comment processes for the Draft EIS. The Army held three public meetings for the Draft EIS. Comments and responses to comments are included in the Final EIS.

The Final EIS evaluates the potential impacts of a range of reasonable alternatives:

For KTA—(1) Full Retention (of approximately 1,150 acres); (2) Modified Retention (of approximately 450 acres);

For Poamoho—(1) Full Retention (of approximately 4,390 acres); (2) Modified Retention (of approximately 3,170 acres);

For MMR—(1) Full Retention (of approximately 782 acres); (2) Modified Retention (of approximately 572 acres); (3) Minimum Retention (of approximately 162 acres and 2.4 miles of select range and firebreak roads).

The Final EIS also analyzes the potential impacts of the No-Action Alternative, under which Army use of the leased land would cease altogether when the lease expires in 2029. The Army has identified the preferred alternative as Alternative 2 at KTA and as the No-Action Alternative at Poamoho and MMR. The Army based its preference on public comments, environmental, social, technical, and economic considerations, and the ability of the alternative to meet the mission of the Army.

The Final EIS analyzes: land use; biological resources; cultural resources; cultural practices; hazardous substances and hazardous wastes; air quality and greenhouse gases; noise; geology, topography and soils; water resources; socioeconomics; environmental justice; transportation and traffic; and human health and safety.

The analyses regarding air quality, greenhouse gases, and environmental justice were prepared according to now-rescinded executive orders, and according to Council on Environmental Quality and Army NEPA implementing regulations that have been or are in the process of being rescinded. Because the analyses of air quality, greenhouse gases, and environmental justice were provided to the public for comment, they are included as part of the Final EIS for purposes of transparency and consistency.

The Final EIS indicates that significant adverse impacts could occur on land use (land tenure) and environmental justice at KTA and Poamoho under Alternatives 1 and 2, and at MMR under Alternatives 1, 2, and 3. Significant adverse impacts could occur on cultural practices with a lease or fee simple sale at MMR under Alternatives 1, 2, and 3. Some of the significant impacts for land use (land tenure) could be reduced to less than significant. The Army has identified mitigation measures in the Final EIS to mitigate adverse impacts on cultural practices and environmental justice at MMR. The modified or minimum-retention alternatives could have significant beneficial impacts on land use (land tenure) for land not retained at KTA, Poamoho, and MMR. Impacts of the action alternatives on other resources are less than significant. The No-Action Alternative could have a significant beneficial impact on land use (land tenure) and environmental justice at all areas, and on cultural practices at MMR. The No-Action Alternative could have less than significant impacts on all other resources at the three areas.

The Army distributed the Final EIS to Native Hawaiian Organizations, federal, state, and local agencies and officials, and other stakeholders.

James W. Satterwhite, Jr.,

U.S. Army Federal Register Liaison Officer.

[FR Doc. 2025–08697 Filed 5–15–25; 8:45 am]

BILLING CODE 3711–CC–P

DEPARTMENT OF DEFENSE

Department of the Army, Corps of Engineers

Notice of Intent To Prepare a Supplemental Environmental Impact Statement for the Operation and Maintenance of the Willamette Valley System

AGENCY: U.S. Army Corps of Engineers, Department of the Army, DoD.

ACTION: Notice of intent.

SUMMARY: Pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended, the U.S. Army Corps of Engineers, Portland District (USACE) intends to prepare a Supplemental Environmental Impact Statement (SEIS) to address the directive in the 2024 Water Resources Development Act (WRDA) to formally analyze an alternative that would cease hydropower operations at USACE owned and operated Willamette Valley Projects. The Willamette Valley System (WVS) must operate for its Congressionally authorized project purposes while complying with all applicable laws, including the Endangered Species Act (ESA), to avoid jeopardizing the continued existence of listed species. The USACE will serve as the lead Federal agency for the SEIS.

DATES: The USACE invites Federal and State agencies, Native American Tribes, local governments, interested parties, and the public to submit comments on development of the scope of the SEIS by June 6, 2025.

ADDRESSES: Send written scoping comments to U.S. Army Corps of Engineers, Portland District, P.O. Box 2946, Attn: CENWP–PME–E, Portland, OR 97208–2946. Email comments or requests to be added to the mailing list to: *willamette.eis@usace.army.mil.* All comments and materials received, including names and addresses, will become part of the administrative record and may be released to the public.

FOR FURTHER INFORMATION CONTACT: For questions regarding the SEIS, or special accommodations for scoping process participation, please contact Mr. Garrett Dorsey, Chief of Environmental Planning, (541) 525–4417. For media inquiries, please contact USACE, Portland District, via email at *cenwp-pa@usace.army.mil.*

SUPPLEMENTARY INFORMATION:

1. Background. The WVS consists of 13 multipurpose dams and reservoirs, riverbank protection projects in the Willamette River Basin in Oregon, and hatchery programs to mitigate for effects of the project on fish habitat. USACE

completed the most recent NEPA evaluation for the overall WVS operations and maintenance in April 2025. The Record of Decision for that effort was narrow, including only the necessary interim actions, while the longer-term actions could be compared with an alternative that would cease hydropower operations as directed by section 1326 of the WRDA 2024. USACE will prepare the SEIS in accordance with NEPA (42 U.S.C. 4321) and USACE's NEPA regulations (33 CFR part 230). The USACE received the National Marine Fisheries Service's (NMFS) Biological Opinion for the continued operations and maintenance of the WVS under section 7 of the ESA in December 2024. The SEIS will also include actions included in the 2024 NMFS Biological Opinion that were not previously analyzed. ESA section 7 consultation with U.S. Fish and Wildlife Service is ongoing. Consultation under section 106 of the National Historic Preservation Act is also ongoing. The USACE anticipates making the draft SEIS available for public comment in Fall of 2025.

The USACE invited the Tribes and Federal and State agencies that participated as cooperating agencies for the previous WVS EIS to participate as cooperators on the SEIS. Those Tribes and agencies include: Confederated Tribes of Warm Springs Reservation of Oregon, Confederated Tribes of Grand Ronde Community of Oregon, Confederated Tribes of Siletz Indians, Bonneville Power Administration, National Marine Fisheries Service (NMFS), U.S. Bureau of Reclamation, U.S. Fish and Wildlife Service, Environmental Protection Agency (EPA), Oregon Department of Fish and Wildlife, Oregon Water Resources Department, Oregon Department of Environmental Quality, and Oregon Department of Agriculture.

2. Alternatives. The SEIS will include and build off the alternatives developed for the FEIS. USACE will add actions to address the NMFS 2024 Biological Opinion and the Congressional directive in WRDA 2024 to formally analyze an alternative that ceases hydropower operations at the USACE's Willamette Valley dams. Comments received during the scoping comment period will inform the development of additional actions, the new ''no-hydropower alternative'', and how it is analyzed.

3. Scoping Process/Public Involvement. The public scoping process is to provide information to the public, narrow the scope of analysis to significant environmental issues, solicit agency and public input on alternatives and issues of concern, and ensure full and open participation in scoping for the Draft SEIS. The USACE will hold public scoping meetings during the scoping period. The specific dates, times, and locations of the meetings will be published on the USACE's website for this SEIS: *https://www.nwp.usace.army.mil/WVS-EIS.* Documents and other important information related to the SEIS will be available for review on the USACE's SEIS website.

Jeffrey D. Hall,

Colonel, Corps of Engineers, Deputy Division Commander.

[FR Doc. 2025–08689 Filed 5–15–25; 8:45 am]

BILLING CODE 3720–58–P

DEPARTMENT OF EDUCATION

Applications for New Awards; Expanding Opportunity Through Quality Charter Schools Program—Grants for Credit Enhancement for Charter School Facilities

AGENCY: Office of Elementary and Secondary Education, Department of Education.

ACTION: Notice.

SUMMARY: The Department of Education (Department) is issuing a notice inviting applications for fiscal year (FY) 2025 for Charter Schools Program (CSP)—Grants for Credit Enhancement for Charter School Facilities (Credit Enhancement).

DATES:

Applications Available: May 16, 2025.

Deadline for Notice of Intent to Apply: Applicants are strongly encouraged but not required to submit a notice of intent to apply by June 16, 2025. Applicants who do not meet this deadline may still apply.

Deadline for Transmittal of Applications: June 25, 2025.

Deadline for Intergovernmental Review: August 25, 2025.

Pre-Application Webinar Information: The Credit Enhancement program intends to hold a webinar to provide technical assistance to interested applicants. Detailed information regarding this webinar will be provided at *https://www.ed.gov/grants-and-programs/grants-birth-grade-12/charter-school-programs/credit-enhancement-for-charter-school-facilities-program.*

Note: For new potential grantees unfamiliar with grantmaking at the Department, please consult our ''Getting Started with Discretionary Grant Applications web page at *https://www.ed.gov/grants-and-programs/apply-grant/getting-started-discretionary-grant-applications.*

ADDRESSES: For the addresses for obtaining and submitting an application, please refer to the Application Submission Instructions section.

FOR FURTHER INFORMATION CONTACT: Thea Fowles, U.S. Department of Education, 400 Maryland Avenue SW, Washington, DC 20202–5970. Telephone: (202) 987–1727. Email: *charter.facilities@ed.gov.*

If you are deaf, hard of hearing, or have a speech disability and wish to access telecommunications relay services, please dial 7–1–1.

SUPPLEMENTARY INFORMATION:

Full Text of Announcement

I. Funding Opportunity Description

1. Purpose of Program: Through CSP Credit Enhancement grants, the Department provides grants on a competitive basis to eligible public and private nonprofit entities that demonstrate innovative ways to assist *charter schools* [1] with the costs related to acquiring, constructing, and renovating facilities by enhancing the availability of loans and bond financing.

Charter schools supported under CSP Credit Enhancement grants provide elementary or secondary education, or both, and may also serve students in *early childhood education programs* or postsecondary students.

Assistance Listing Number: 84.354A.

OMB Control Number: 1810–0775.

Note: The table below highlights key aspects of the funding opportunity in this NIA. Applicants are encouraged to thoroughly review this notice for a detailed listing and description of all competition requirements before submitting an application.

[1] Terms defined in this notice are italicized the first time they are used.

Attachment L:Public Scoping Meeting Presentation for Supplemental Environmental Impact Statement

WELCOME!

This is a public meeting to provide information about the Willamette Valley System Supplemental Environmental Impact Statement and the ongoing public comment period.

For more information on the project and future project updates visit: *https://www.nwp.usace.army.mil/WVS-EIS/*

This meeting is for information only and is not a formal National Environmental Policy Act (NEPA) commenting venue. Questions and comments provided during this teleconference will *not* be transcribed and submitted to the record to be addressed in the SEIS.

We will post a recording of this call to the project website and any personal information you share on the call will become public. Everyone on the call will be able to see or hear your question/comments.

We will begin the presentation shortly.

Willamette Valley Operations & Maintenance Supplemental Environmental Impact Statement

Public Scoping Meetings

May 28 – June 3, 2025

U.S. ARMY

US Army Corps of Engineers®

Opening Remarks

WVS SEIS Information Session Objectives

- Why Are We Here Today
- Quick overview of the Willamette Valley System
- New alternative for ending hydropower in the WVS
- Proposed drawdown at Detroit Reservoir
- Questions and ways to comment

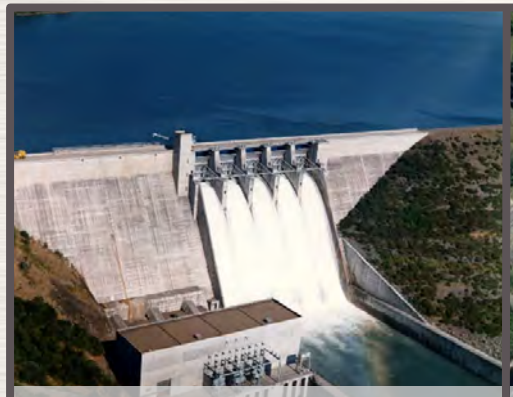
1894 flood, downtown Portland, Willamette River

History

1936 - Congress passed Flood Control Act authorizing Corps to survey flood problems in the Willamette Basin

1938 - Flood Control Act provided for the first seven dams and storage reservoirs

Congressionally Authorized Purposes


Flood Risk Management

Hydropower

Navigation

Water Quality

Irrigation

Water Supply

Recreation

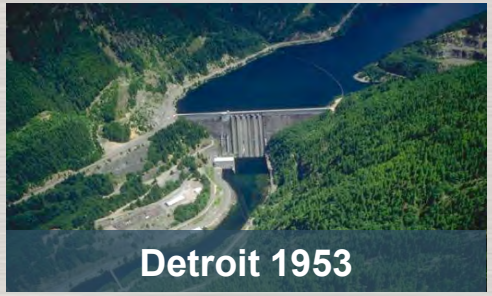
Fish & Wildlife

Willamette Valley System Multi-Purpose Dams

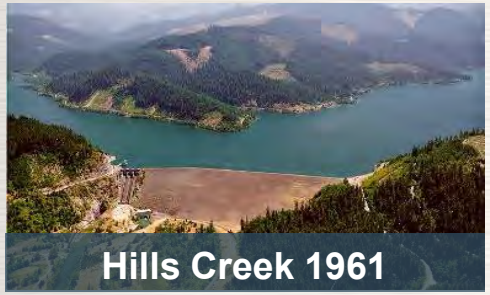
Fern Ridge 1941

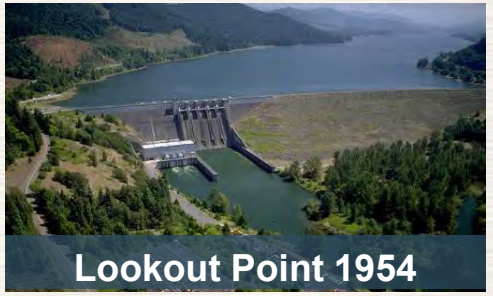
Cottage Grove 1942

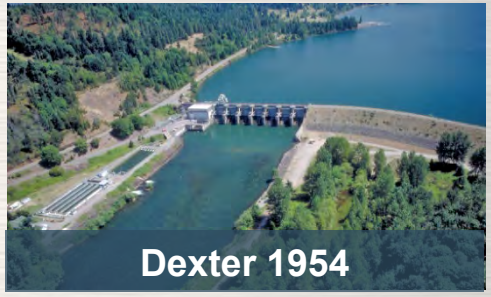
Dorena 1949


Detroit 1953

Big Cliff 1953

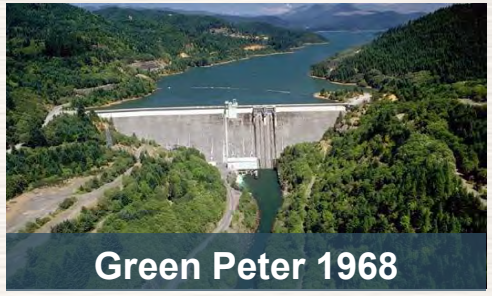

Hills Creek 1961


Lookout Point 1954


Dexter 1954

Cougar 1963

Fall Creek 1965

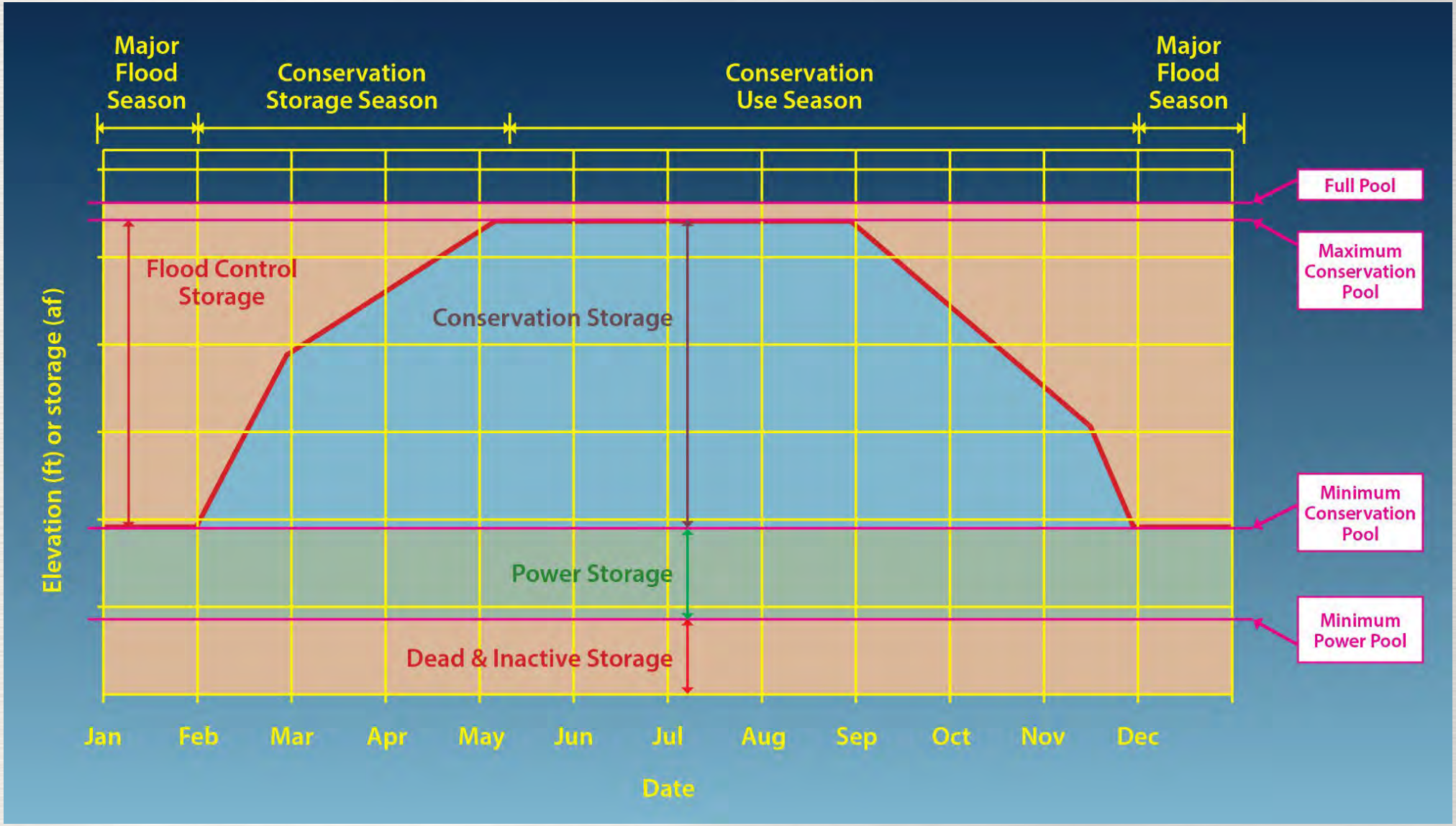

Green Peter 1968

Foster 1968

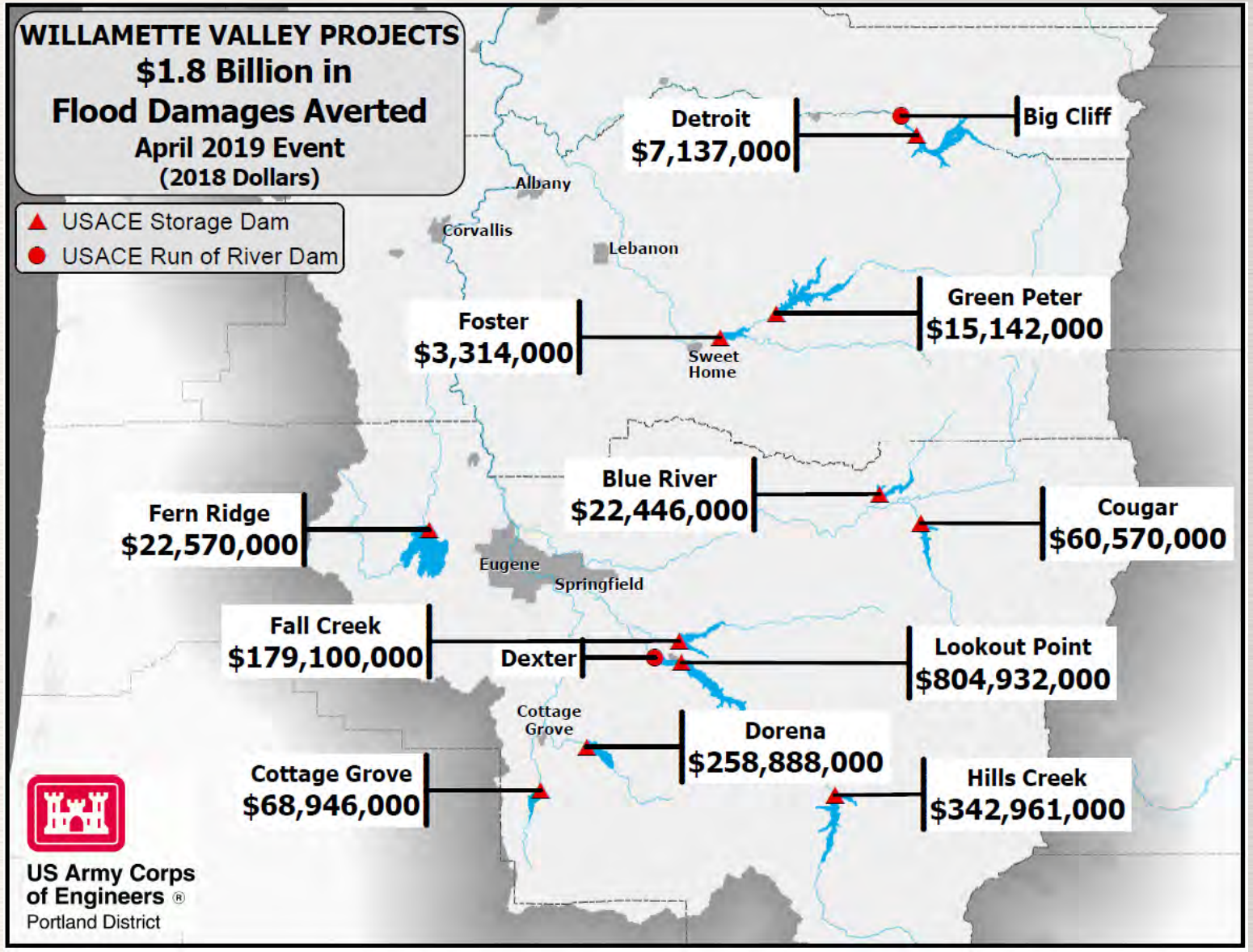
Blue River 1969

The Willamette Valley System

Water Control Diagram – Rule Curve



Economic Damages Averted



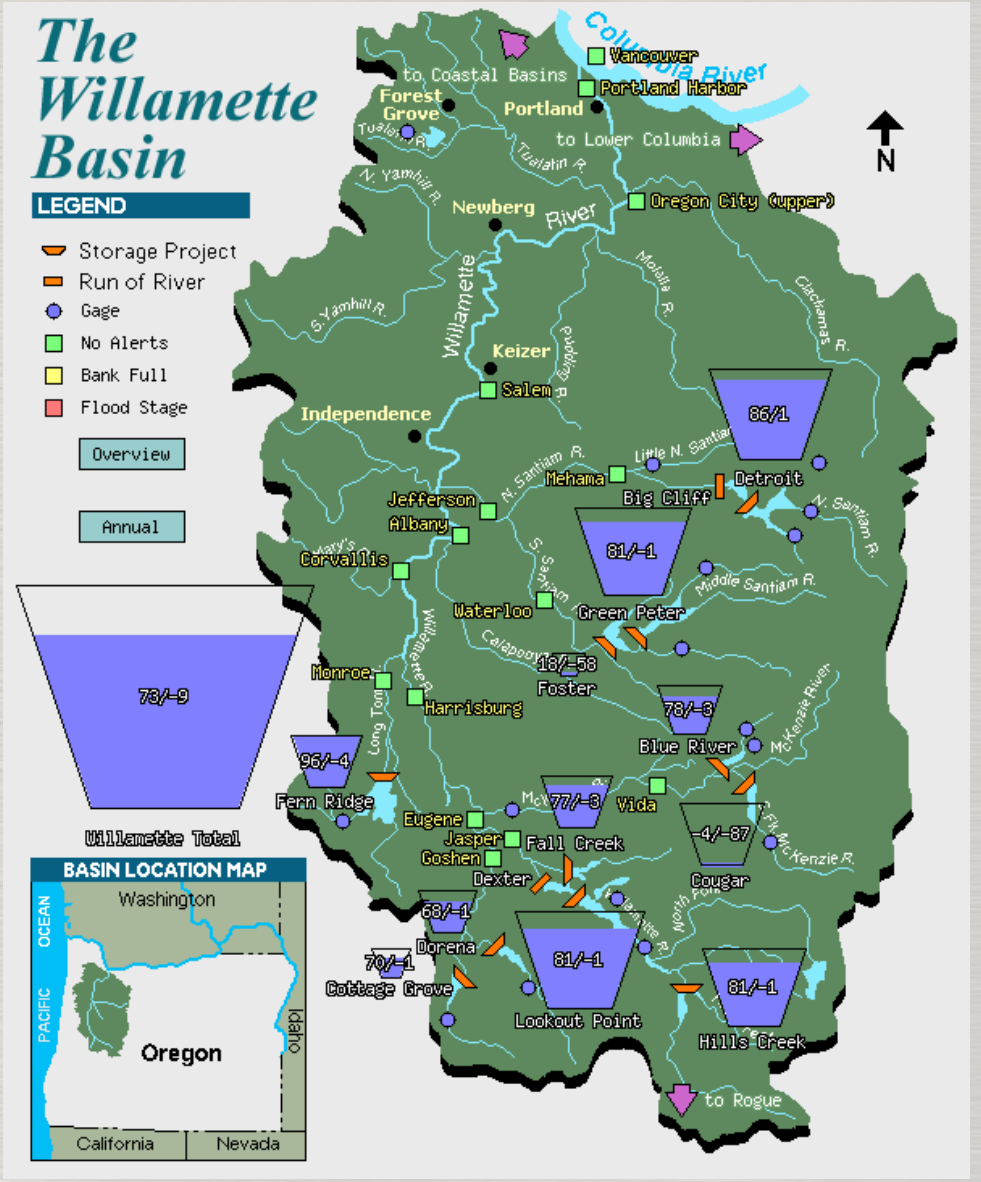
Water Management

13 dams of the Willamette Valley operate as a single system

The Corps must balance competing authorized purposes

Water management decisions include collaboration with agency partners

“Willamette Teacup Diagram” provides current flow and reservoir data

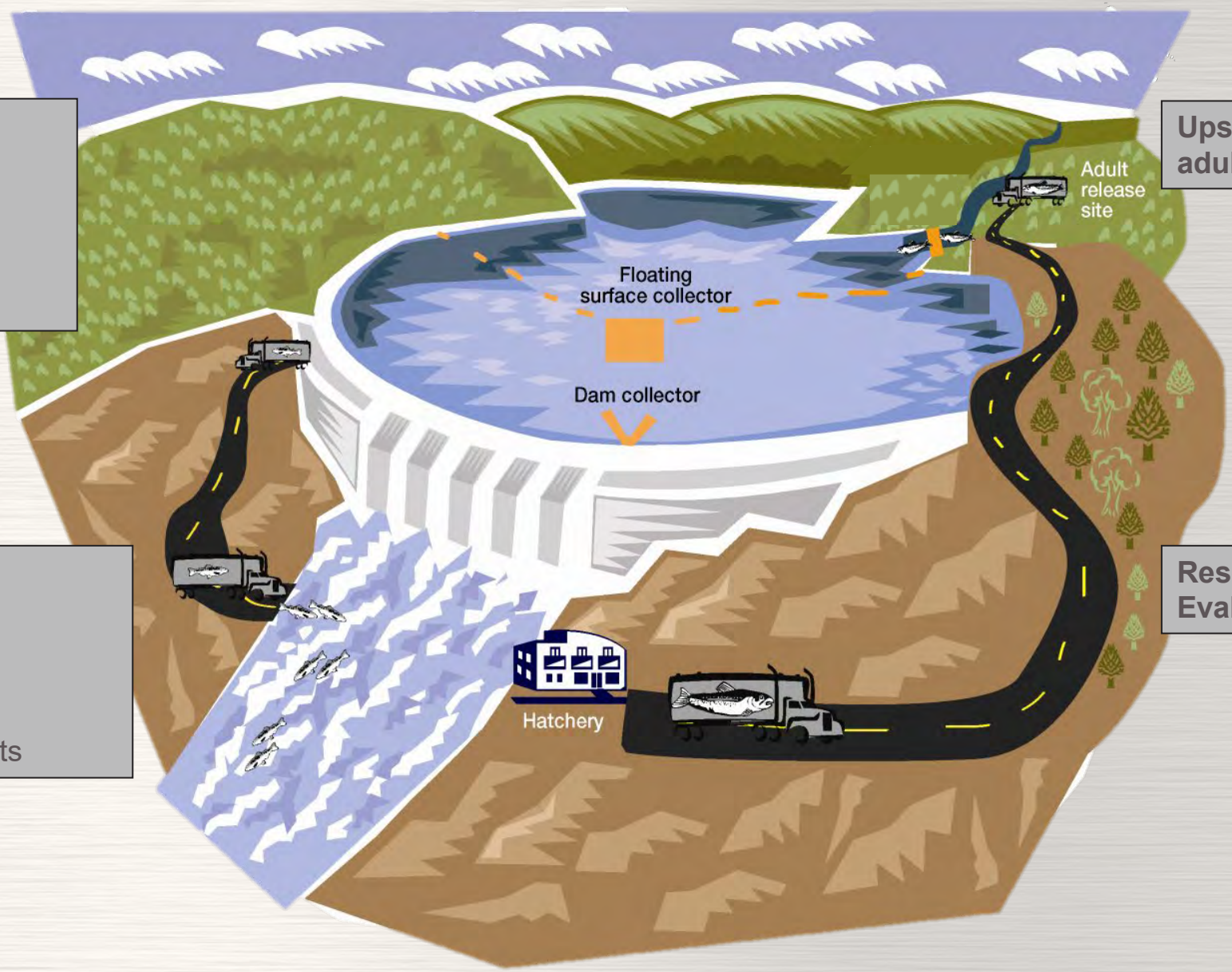


Willamette Valley Biological Opinion Actions

Downstream juvenile fish passage facilities / Deep drawdowns

- Green Peter
- Lookout Point
- Fall Creek
- Detroit
- Cougar
- Foster

Upstream fish passage for adults via trap-and-haul



Downstream Habitat Improvements

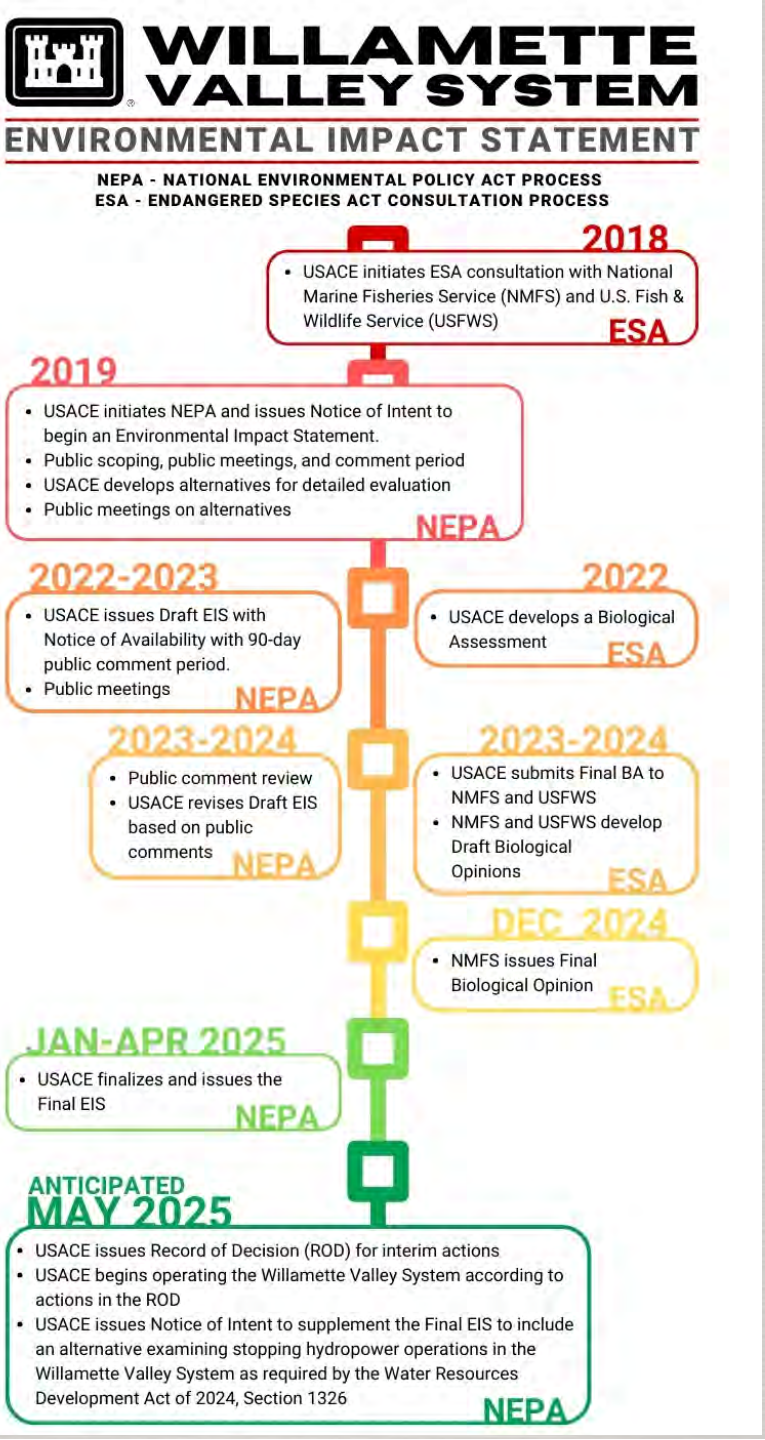
- Flow
- Temperature
- Hatchery improvements
- Habitat Restoration Projects

Research, Monitoring, and Evaluation

Willamette Valley System Operations & Maintenance EIS

In April, USACE published the **Final Environment Impact Statement** in the Federal Register.

- It analyzed the environmental and social benefits and impacts of seven different ways (alternatives) to operate and maintain the Willamette Valley System of dams and reservoirs.
- Alternatives are distinguished by operational or structural changes designed to improve flow, water quality, and fish passage.
- Preferred alternative is a combination of operational or structural changes
- Evaluates the impacts of alternative operations for the next 30 years.



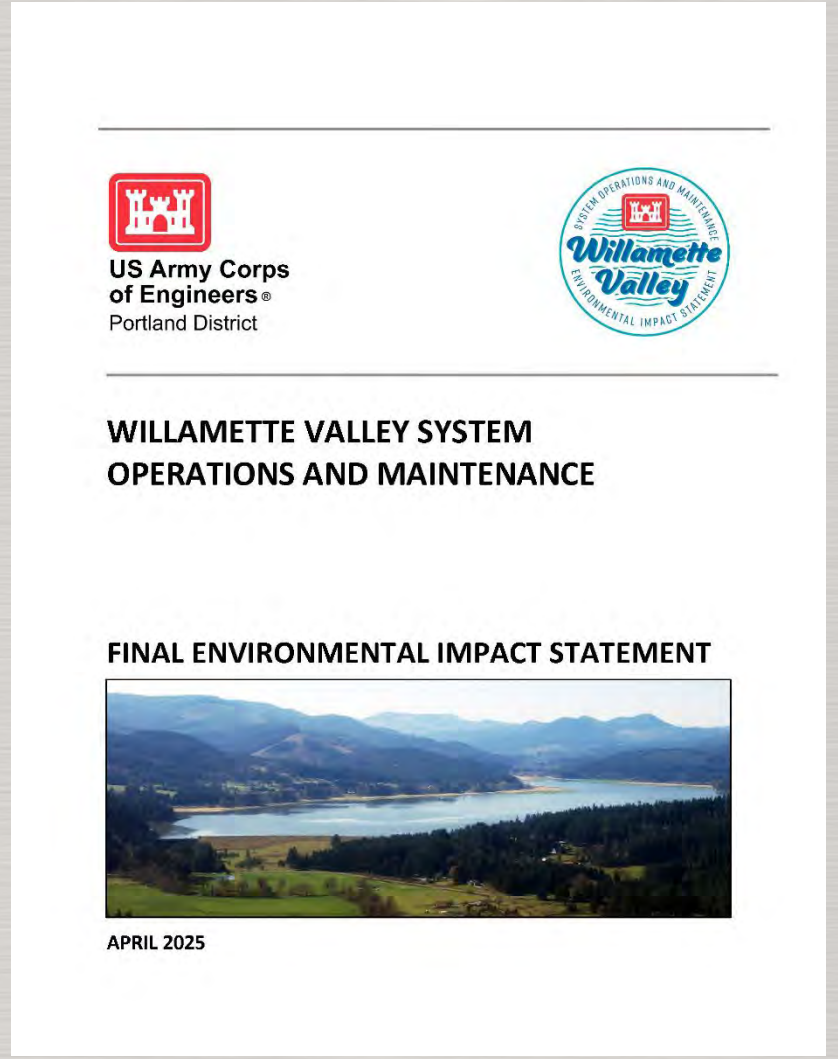
Why is the Corps preparing a Supplemental Environmental Impact Statement ?

In January 2025, the President signed into law the Water Resources Development Act of 2024.

Section 1326 prevents us from completing our environmental review of the system until we prepare and formally analyze an alternative that "ceases hydropower operations" in the Willamette Valley System of dams and reservoirs.

In December 2024, the National Marine Fisheries issued a Biological Opinion on the Operation and Maintenance of the Willamette Valley System.

It includes a deeper fall drawdown at Detroit Reservoir.


US Army Corps of Engineers®
Portland District

Willamette Valley

WILLAMETTE VALLEY SYSTEM
OPERATIONS AND MAINTENANCE

FINAL ENVIRONMENTAL IMPACT STATEMENT

APRIL 2025

WVS Supplemental EIS Purpose and Need

The Purpose and Need for the Willamette Valley System Supplemental EIS is the continued operation and maintenance of the Willamette Valley System of dams and reservoirs –

for specific, authorized project purposes;

and in compliance with the Endangered Species Act and all other applicable treaties, laws, and regulations.

Alternative 6

End Hydropower Operations at Willamette Valley System Dams

Focus

- End federal hydropower operations at the dams.

Key Defining Elements

- Remove or decommission all hydropower infrastructure and update the powerhouse systems.
- Provide fish passage and water temperature management.
- Continue to operate for all other purposes, like flood risk management, fish and wildlife, agricultural irrigation, and municipal and industrial water supply.
- Dorena Dam will continue private hydropower generation.

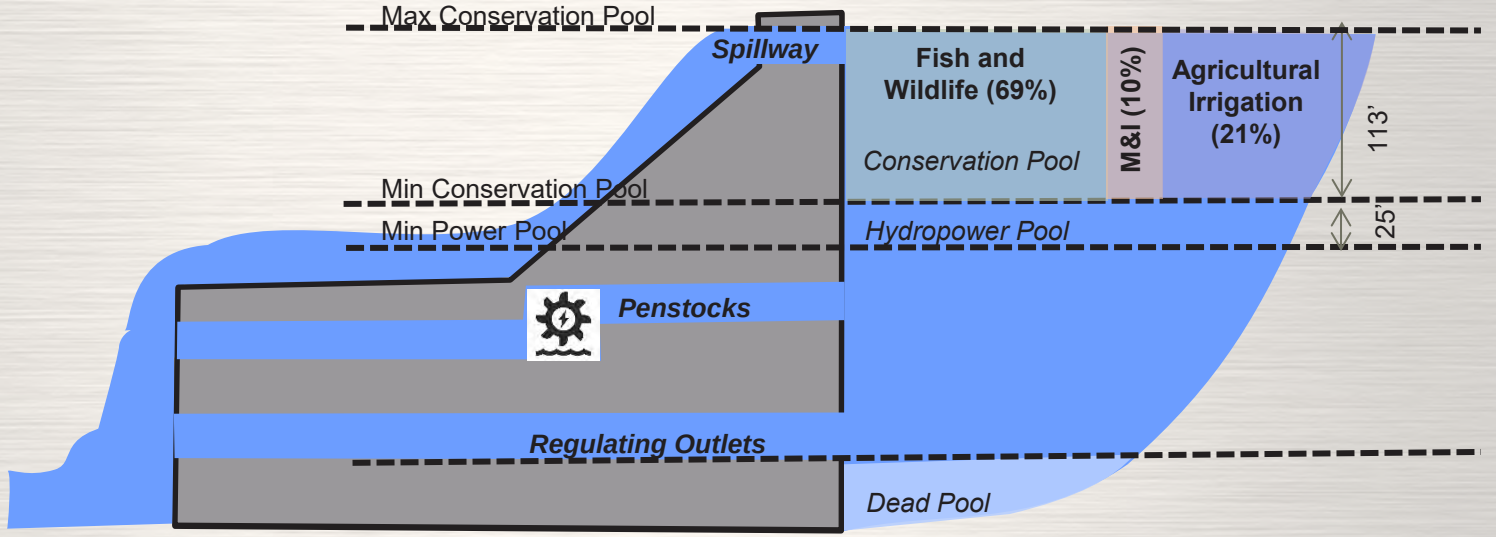


Fig. example cross section of Detroit Dam showing outlet and associated pool elevations

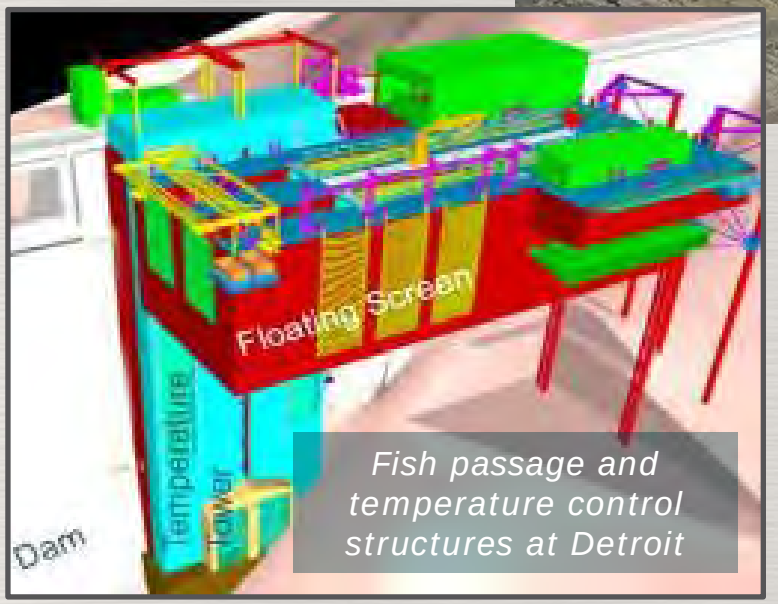
Alternative 6

End Hydropower Operations at Willamette Valley System Dams

Includes actions in the Reasonable and Prudent Alternative (RPA) for fish passage and water quality and 2008 Biological Opinion flows, as required by the 2024 National Marine Fisheries Service Biological Opinion

- Water Temperature and Fish Passage Structures at Detroit
- Adult fish facility at Green Peter
- Spring spill and fall draw down at Green Peter for fish passage
- Spring and fall draw down to Diversion Tunnel at Cougar Dam for fish passage
- Fish Passage Structure at Lookout Point
- Pacific lamprey passage infrastructure

Deep Drawdown at Cougar Reservoir



Fish passage and temperature control structures at Detroit

Alternative 6

End Hydropower Operations at Willamette Valley System Dams

Proposed New Measures

- Remove or decommission all hydropower infrastructure and reconfigure powerhouse systems
- Replace power required to operate the dam and auxiliary facilities
- Reconfigure penstock outlets (below)

Figure 1. Standard Cone Valve with Conical Spray at Boulder Dam, Colorado

Figure 2. In-line Orifice Systems inside Pipelines (Seven Oaks Dam, lower left; The Dalles Dam, upper middle and right)

Interim Operations

A set of operations to improve conditions until the long-term action is in place.

North Santiam (Detroit & Big Cliff)

- Detroit spring/summer spill for downstream fish passage and water temperature management
- Detroit fall lower regulating outlet (RO) for downstream water temperature management
- Detroit winter **drawdown** for downstream fish passage through upper ROs
- Big Cliff spread spill to reduce TDG

South Santiam (Green Peter & Foster)

- Green Peter spring spill for downstream fish passage
- Green Peter fall deep drawdown for downstream fish passage through ROs
- Foster spring delayed refill and spill for downstream fish passage
- Foster fall spill for downstream fish passage

McKenzie (Cougar)

- Fall drawdown for downstream fish passage through ROs
- Spring delayed refill for downstream fish passage through ROs

Middle Fork Willamette (Lookout Point, Dexter, & Fall Creek)

- Hills Creek winter night-time RO prioritization for fish passage
- Lookout Point/Dexter spring/summer spill for downstream fish passage and water temperature management
- Lookout Point fall deep drawdown for downstream fish passage through ROs

Detroit Deep Fall Drawdown

Focus

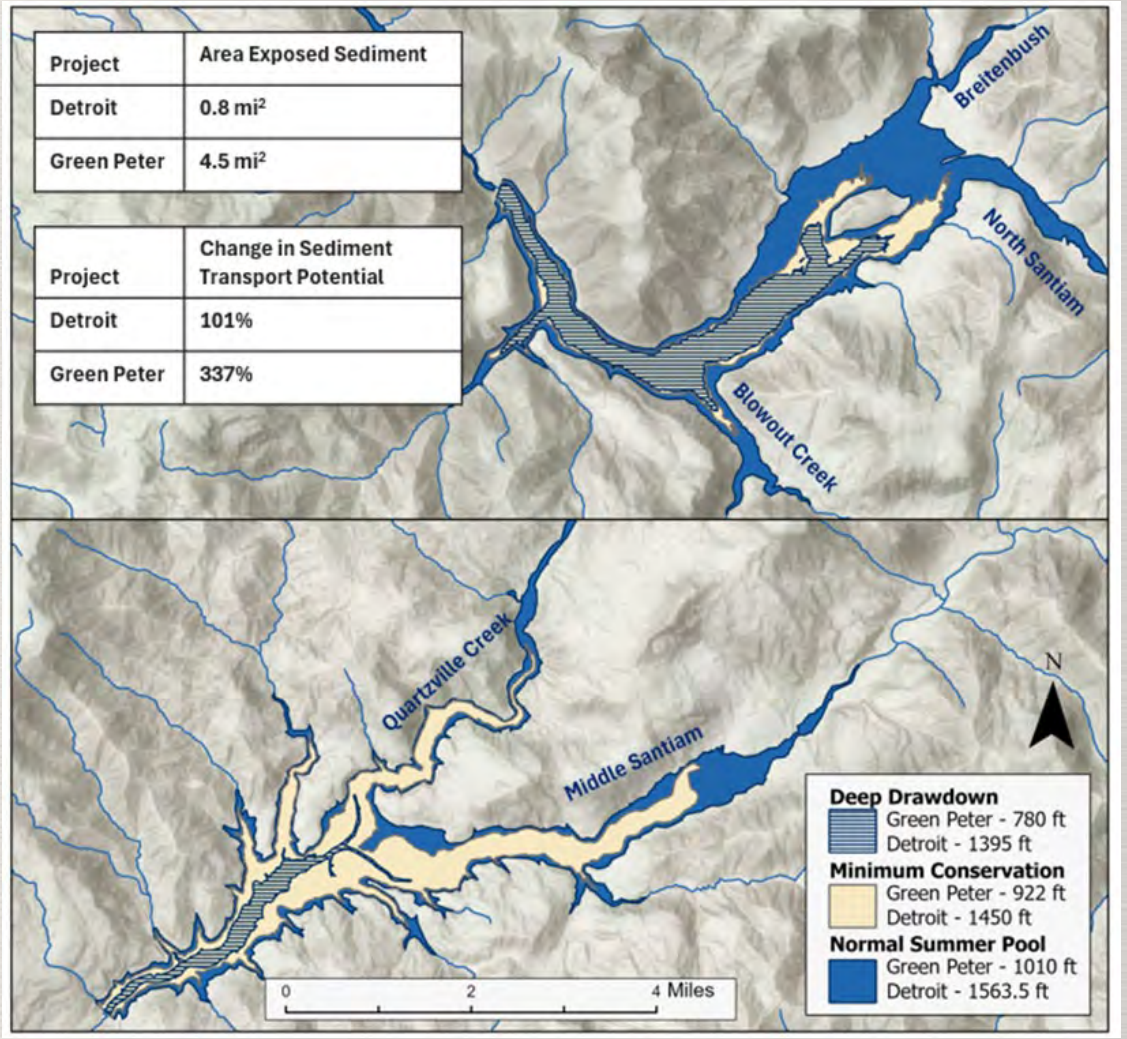
- New interim operation required by the 2024 National Marine Fisheries Service Biological Opinion

Key Defining Elements

- Draw down Detroit Reservoir to 1395 feet
- 55 feet below the winter pool, or about 30 feet lower than the reservoir has ever been drawn down to since construction.

Proposed implementation details

- December timeframe
- Multi-year, stepwise approach to target elevation of 1395 feet
- Downstream turbidity triggers



Green Peter (bottom) and Detroit (top) exposed areas between the normal minimum conservation pool and the deep drawdowns. The Detroit drawdown will expose a lot less sediment.

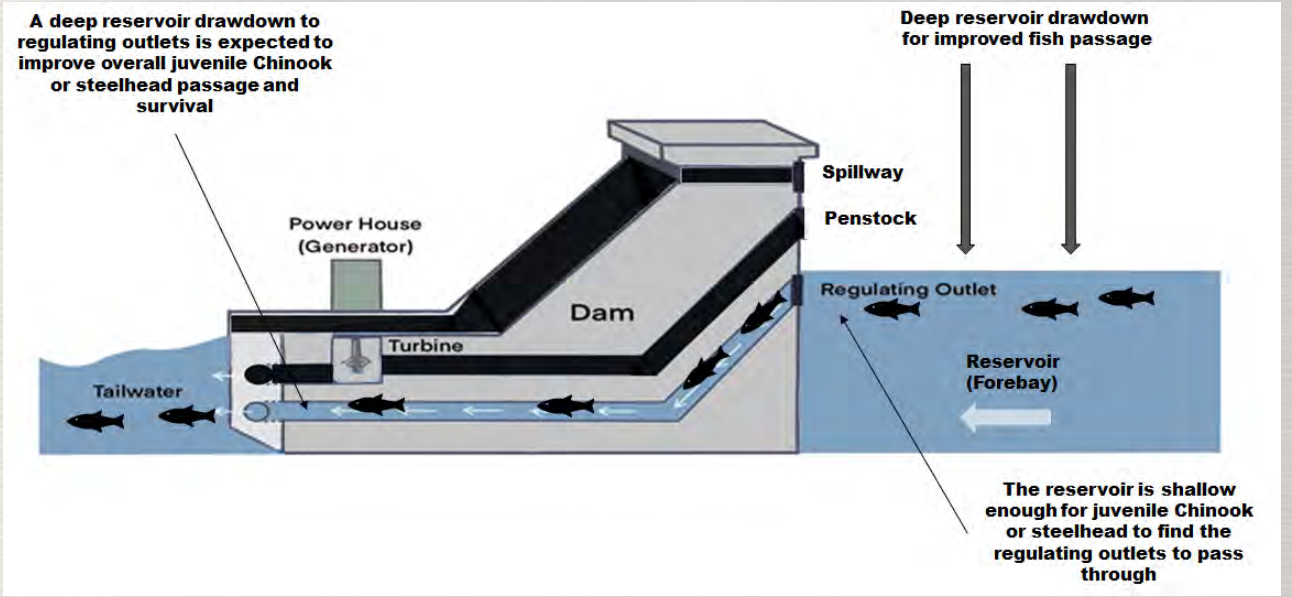
Detroit Deep Fall Drawdown

Fisheries

- Purpose of measure is to provide a surface-oriented and safe fish passage route for fish moving downstream.

Drinking Water/Water Supply/Irrigation

- Timing proposed to minimize impacts to conservation storage (refill of the lake).
- Step-wise approach proposed to reduce turbidity and minimize effects to downstream municipal drinking water facilities.
- Turbidity triggers would inform step-down approach.



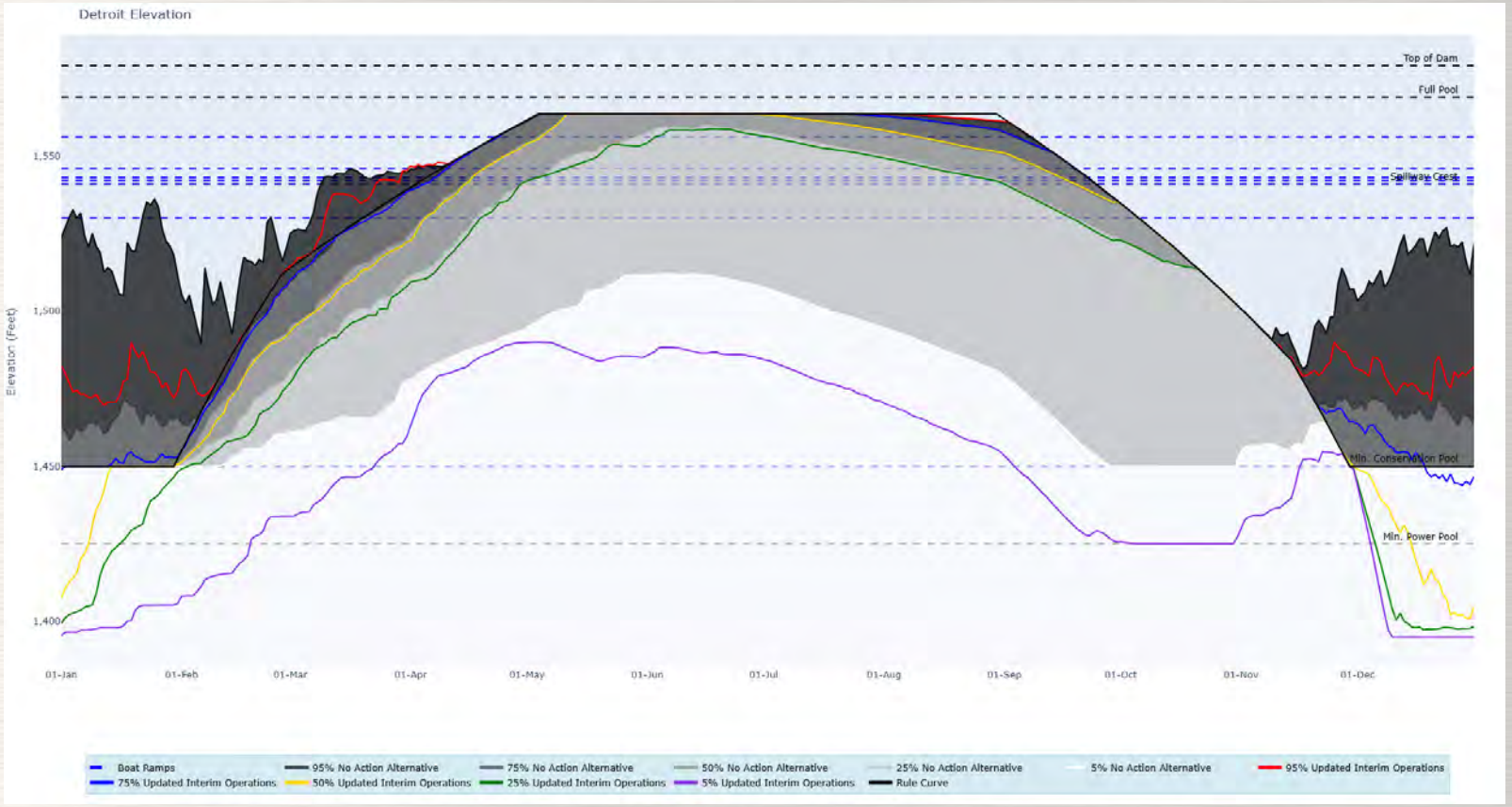
Detroit Deep Fall Drawdown

Recreation

- Timing proposed to minimize impacts to conservation pool and reservoir elevations during recreation season.
- Duration proposed would reduce amount of time reservoir is below boat ramps.

Conservation Storage

- Late summer and fall reservoir levels not affected by the drawdown,
- Refill only affected in very dry years



Thank You Cooperating Agencies

How to Comment

- 36-day comment period ends June 21, 2025.
  - 15 extension from original 21-day period
- All public comments will be included in the official record.
- You can submit public comments in writing or via email to the following addresses.

Email Address: willamette.eis@usace.army.mil

Mailing Address:
U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
PO Box 2946
Portland, OR 97208-2946

Please add “Willamette Valley System SEIS” in the subject line.

Agency Contact
Liz Oliver
U.S. Army Corps of Engineers
Portland District Office
Block 300
333 SW 1st Avenue
Portland, OR 97204
(503) 808-4712

Virtual Meetings
Wednesday May 28, 6 – 8pm
Thursday May 29, noon – 1pm

In-Person Meetings
Saturday May 31, 10 am – noon, Detroit City Hall
Tuesday June 3, 6 – 8pm, Salem at Broadway Commons

https://www.nwp.usace.army.mil/WVS-EIS/

SEIS Overview:
https://www.youtube.com/watch?v=HtGfTf6xd8A

Attachment M:Public Comments Received for Supplemental Environmental Impact Statement

Herod, Megan K CIV (USA)

From: Mark Hutchinson <hutchisfishin@gmail.com>
Sent: Sunday, June 22, 2025 9:04 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit and Green Peter Dams scoping comments.
Attachments: Army corp responces.docx

Thank you for this opportunity to comment.
I have spent a lifetime working on the Willamette River, first downstream on the Portland Big Dig project, eliminating sewer overflows to the Willamette and Columbia Slough, then building restoration projects on the Columbia Slough, Lower Willamette, and tributaries. I also participated in projects to reduce flooding downstream and was sandbagging during the 1996 flood. I get some of the issues.

My relatives have a grass seed and wheat farm along the river, and others commercial fish in the lower river. I grew up boating the river and now spend 3 to 4 days a week on the river in my boat.

I think we have an opportunity here to do something great that will outlast our lifetimes.

How this came about is unfortunate with the lawsuits and lack of funding, however now is the time to work for our future generations.

Please find my comments also made through NW Steelheaders.
Please consider them,
I can follow up or meet with you.

Thanks,

--
Mark W. Hutchinson, PE

Detroit Dam and SEIS,

We want to thank the Army Corp of Engineers and NIMPF's for the opportunity to comment on the revised operation plan for the Willamette System of flood control reservoirs. NW Steelheaders' feels it is about time that the Army Corp of Engineers plans bring the dams and fish passage structures to current standards based on the best available science, as we have seen other government agencies do in Oregon (City of Portland Bull Run, PGE Clackamas & Deschutes Rivers). NW Steelheaders asks that the plan consider fish passage structures at Green Peter as well as Detroit dam and a downriver fish passage pipe from the collection structure at Detroit Dam past Big Cliff Dam as PGE constructed on the Clackamas River. Other agencies have built such structures in recent times at their Dams in Oregon as referenced above; where the fish passage pipe transports down migrating fish passed these two dams shortening the passage time and mortality.

At Green Peter Dam as we understand it the dam has a collection structure which was abandoned in the 1980's with passage portals through the dam, providing opportunity and a place for new piping and mechanical structures. We ask at a minimum the Army Corp consider developing and engineering predesign, cost estimate and schedule for upgrading the abandoned fish passage structure at Green Peter Dam. We understand that funding may not allow construction but feasibility will allow further study in the future saving time and cost. The draw downs at Green Peter have basically resulted in fish mortality of all crossing fish, and in our opinion do not meet current engineering, and science standards. Not to mention the effects on downstream water temperature and turbidity. We further ask that the work be completed using construction divers as is currently being performed at other dams in lieu of drastic reservoir draw downs resulting in fish mortality (Deschutes, and Bull Run).

Our third request is to accelerate work on the revetment's/ river restoration projects downstream of Foster and Big Cliff Dams. Restoration and habitat projects on the lower tributaries below the dams consider cold water refuge for down migrating fish, and preserved habitat for spawning as seen on the Clackamas river, and many others on the Oregon coast. We suggest thet the federal government provide farm subsides for restoration projects along the tributaries such as the McKenzie, Long Tom, Mary's, Calapooia, Santiam, Luckiamute, Yamhill, Molalla, Tualatin, and Clackamas rivers. This combined with a brood stock pilot program for these tributaries to recover the winter steelhead runs, with native fish.

Thank you again,

Mark W. Hutchinson, PE Northwest Steelheaders

Herod, Megan K CIV (USA)

From: Mark Hutchinson <hutchisfishin@gmail.com>
Sent: Sunday, June 22, 2025 8:56 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] CENWP-PME-E / Willamette EIS
Attachments: Army corp responces.docx

Please find comments from NW Steelheaders for the revised EIS

Thank you for the presentations and opportunities.
We will continue to lobby our senators for funding for Dam improvements.

--
Mark W. Hutchinson, PE

Detroit Dam and SEIS,

We want to thank the Army Corp of Engineers and NIMPF's for the opportunity to comment on the revised operation plan for the Willamette System of flood control reservoirs. NW Steelheaders' feels it is about time that the Army Corp of Engineers plans bring the dams and fish passage structures to current standards based on the best available science, as we have seen other government agencies do in Oregon (City of Portland Bull Run, PGE Clackamas & Deschutes Rivers). NW Steelheaders asks that the plan consider fish passage structures at Green Peter as well as Detroit dam and a downriver fish passage pipe from the collection structure at Detroit Dam past Big Cliff Dam as PGE constructed on the Clackamas River. Other agencies have built such structures in recent times at their Dams in Oregon as referenced above; where the fish passage pipe transports down migrating fish passed these two dams shortening the passage time and mortality.

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Thank you again,

Mark W. Hutchinson, PE Northwest Steelheaders

Herod, Megan K CIV (USA)

From: MUCKEN Alyssa M * WRD <Alyssa.M.MUCKEN@water.oregon.gov>
Sent: Saturday, June 21, 2025 2:46 PM
To: CENWP-PME-Williamette-Valley-System-EIS; Oliver, E A (Liz) CIV (USA)
Cc: FERRARI Chandra Alene * GOV; GALL Ivan K * WRD; WOODCOCK Douglas E * WRD; MCCORD Mike L * WRD; REIS Kelly E * ODFW; GOLDRICH-MIDDAUGH Grace * DEQ; BLAKELY Lanaya F * WRD; WACKER Gregory J * WRD
Subject: [Non-DoD Source] Willamette sEIS - OWRD comments
Attachments: 2025_06_21_sEIS letter_OWRD_final.pdf

Hi Liz, please see the attached scoping comments from OWRD for the supplemental EIS. Thank you for the opportunity to comment.

Alyssa

Alyssa Mucken, Senior Water Advisor
Oregon Water Resources Department
725 Summer St. NE, Suite A, Salem, OR 97301
alyssa.m.mucken@water.oregon.gov | 503-871-6964

Oregon
Tina Kotek, Governor

Water Resources Department
725 Summer St NE, Suite A
Salem, OR 97301
(503) 986-0900
Fax (503) 986-0904
www.Oregon.gov/OWRD

June 21, 2025

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946
Portland, OR 97208-2946

Sent via email to Willamette.EIS@usace.army.mil

RE: Willamette Valley System Supplemental Environmental Impact Statement

Dear Liz,

The Oregon Water Resources Department (OWRD) appreciates the opportunity to inform scoping for the supplemental Environmental Impact Statement (sEIS). Thank you for extending the comment period to June 21 and offering additional cooperator meetings to ask questions and develop a better understanding of the alternative being considered.

No-Hydropower

The proposed alternative will analyze the removal or decommissioning of all hydropower infrastructure, updating the powerhouse systems, while allowing the continuation of private hydropower production at Dorena Dam. During the Cooperating Agency meetings, USACE noted that a key defining element for this new alternative is continued operations for all other purposes, like fish and wildlife, irrigation, recreation, and municipal and industrial water supply.

As USACE considers how the removal of hydropower may affect people and communities, OWRD offers the following for scoping purposes:

- Power Pool Volume – Explore if any benefits are derived from using the power pool volume for other purposes, such as those uses noted above. Include information on how much water is associated with the power pool at each project to help the public, water managers, and others understand its potential use or associated limitations.

- Storage Water Rights – Determine whether existing water rights for storage are sufficient for carrying out operational changes. Today, the U.S. Bureau of Reclamation holds three water rights for the Willamette Basin Project reservoirs, which collectively authorize 1,670,100 acre-feet of storage, primarily for irrigation, with a small amount for municipal or industrial use. For scoping, it would be helpful to clarify whether the power pool will be diminished, combined with the conservation pool, and/or used for other authorized purposes.

- Run-of-River/Year-Round Drawdown – Previous deauthorization studies included a conceptual overview of run-of-river operations. During a Cooperating Agency meeting, USACE noted that "deauthorization does not mean run-of-river," further acknowledging that the reservoirs provide important benefits for water quality and minimum flows for ESA-listed species, municipal and agricultural water supply, recreation, and the regional economy. Should the scope for this sEIS change, please consider the tradeoffs and impacts associated with less or no stored water available annually for recreation, fish and wildlife, as well as current and future water needs of cities, industries, and agriculture. OWRD shares concerns that a run-of-river approach at all projects would result in the elimination of conservation season storage, resulting in significant adverse impacts to authorized purposes, including recreation, water supply, irrigation, fish and wildlife, and water quality.

Deep Drawdown at Detroit Reservoir

The 2024 NMFS Biological Opinion requires a deep fall drawdown at Detroit Reservoir to support the protection of endangered fish species and USACE will use this sEIS to analyze the effects of the drawdown. USACE stated that the timing and duration of the deep fall drawdown at Detroit will be developed with NMFS and the analysis will consider potential impacts to communities and water quality.

As USACE considers how a deep drawdown operation may affect people and communities, OWRD offers the following for scoping purposes:

- Overall Storage Impacts – Consider how these new operations – deep drawdown at Detroit and no hydropower use – coupled with other ongoing operations (e.g., delayed spring refill at Cougar, deep fall drawdowns at Green Peter and Lookout Point, and spring spill operations), reduce the overall probability of filling the reservoirs. In other words, all operations should be integrated in a way that helps basin partners, agencies, and water users understand the collective impact of operational changes on storage volumes, water supply reliability, both annually and in future conditions.

- Coordination with Downstream Communities – OWRD participated in weekly coordination meetings hosted by USACE during the 2024 drawdown operations for Green Peter and Lookout Point reservoirs. OWRD found these meetings to be informative and extremely helpful for understanding the benefits and impacts of operations. For scoping purposes, please consider the linkage between operations on the South Santiam with potential changes in the North Santiam watershed. As USACE evaluates the timing and duration of a Detroit drawdown with NMFS, please consider broader coordination and communication, modeling the 2024 outreach and coordination with drinking water providers and state agencies that was conducted for Green Peter and Lookout Point operations.

OWRD appreciates the opportunity to inform the sEIS scoping process. If you have any questions, please contact our agency's WATER Steering Team member, Alyssa Mucken, alyssa.m.mucken@water.oregon.gov.

Sincerely,

Michael S. McCord

Mike McCord
Northwest Region Manager

Herod, Megan K CIV (USA)

From: Lindsey Hutchison <lindsey@willametteriverkeeper.org>
Sent: Friday, June 20, 2025 4:47 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Willamette Riverkeeper's comments on ending hydropower production, deeper Detroit reservoir drawdowns
Attachments: Willamette Riverkeeper Comment Letter on drawdowns and hydropower 06.20.25.pdf

Hello,

Please accept these comments on behalf of Willamette Riverkeeper on ending hydropower production at the Willamette Valley Project and deeper Detroit reservoir drawdowns.

Please let me know if you have any questions.

Sincerely,
Lindsey

--
Lindsey Hutchison, Staff Attorney
Willamette Riverkeeper
Email: lindsey@willametteriverkeeper.org
(she/her/hers)

Mailing: 454 Willamette St. #218
Eugene, OR 97401
Office: 8940 N. Bradford St.
Portland, OR 97203

503.223.6418

info@willametteriverkeeper.org

June 20, 2025

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946 Portland,
OR 97208-2946

Submitted via email to willamette.eis@usace.army.mil

Re: Comments on the Detroit Reservoir fall drawdowns and ending hydropower generation at the Willamette Valley dams

To Whom It May Concern:

Please consider the following comments from Willamette Riverkeeper concerning the U.S. Army Corps of Engineers ("the Corps") Detroit Reservoir fall drawdowns and ending hydropower generation at the Willamette Valley Project dams.

More than a million Chinook salmon and steelhead once returned to the Willamette River Basin. Over the last one hundred years, with the 1938 authorization of the Willamette Valley System, the effects of flood control and hydropower operations and resulting loss of habitat have driven steep declines in these fish populations throughout the Willamette Basin. These collective pressures contributed to the listing of Upper Willamette River spring Chinook salmon and steelhead under the Endangered Species Act in 1999.[1] **Willamette Riverkeeper encourages the Corps to seriously consider ending hydropower at the Willamette Valley dams as a means of fulfilling its statutory obligations under the Endangered Species Act to ensure that the Willamette Valley System does not jeopardize listed species.**

Eight of the thirteen Willamette Valley Project dams generate hydroelectricity, and while their total maximum generating capacity is 495 megawatts, the annual energy output of these dams is lower, averaging 184.4 megawatts of hydropower.[2] The Willamette dams contribute less than 4% to the average power generation for the entire Federal Columbia

[1] *See* NOAA Fisheries, Upper Willamette River Chinook Salmon Recovery Plan, https://www.fisheries.noaa.gov/west-coast/endangered-species-conservation/upper-willamette-river-chinook-salmon#:~:text=The%20Upper%20Willamette%20River%20Chinook,under%20the%20Endangered%20Species%20Act.

[2] Bonneville Power Administration, Power from the Willamette Basin dams Fact Sheet (August 2019), https://www.bpa.gov/-/media/Aep/about/publications/fact-sheets/fs-201908-Power-from-the-Willamette-Basin-dams.pdf.

River Power System.[3] With the court ordered drawdowns, the energy output from the dams will likely be less. The Corps is currently deciding what option is best for facilitating fish passage through the Willamette Valley Project dams, and the options, including the Corps' preferred option, would cost at least hundreds of millions of dollars.[4] This would increase the cost of hydropower generation at the dams, and they are already "producing power at a much higher cost."[5]

The Willamette Valley Project dams were primarily constructed for flood risk management, with hydropower generation serving as a secondary benefit. However, this benefit is incredibly expensive and harms the listed species that once thrived in the Willamette Basin. Ending hydropower generation at the Willamette Valley dams would enable the U.S. Army Corps of Engineers to manage river flows in a more natural, run-of-river manner. This approach would preserve the dams' flood control capabilities while supporting more natural flow regimes and improving fish passage. It could also eliminate the need for costly fish passage infrastructure—potentially saving hundreds of millions of dollars—and reduce or eliminate the need for annual deep reservoir drawdowns, since flows would remain lower and fish could migrate without extensive human intervention.

Since the Corps initiated the fall drawdowns to help move juvenile fish past the dams, issues have arisen, including wells going dry, which is the sole source of water for some of these communities. "Gates in the dam walls can provide a passage for young salmon to pass downstream," but with current operations, they are too deep underwater for juvenile fish to find as they stay near the surface of the water.[6] Ending hydropower generation allows the Corps to drain the reservoirs behind the dams until they nearly replicate the original river channels. While this may alter the types of recreation around the dams, it would still provide many different recreational opportunities, so these changes will not economically harm the surrounding communities. These drawdowns are the most effective means for providing safe fish passage and are necessary to prevent further harm to fish species. The Corps' idea of creating large floating fish collectors, which have not been proven to work, especially at the scale the Corps proposes, is costly and likely to be ineffective or at least less effective than allowing for more natural stream flows. Ending hydropower and lowering the reservoirs to allow for fish passage would have a much higher success rate, be much less expensive, and create new recreational opportunities on the rivers. This option also has the upside of creating more seismic stability for the Basin, as a major earthquake, such as the Cascadia Subduction Zone earthquake, would no longer have the potential to cause a major flood event for downstream communities.

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[3] *Id.*

[4] *See* Tony Schick, *'Killing salmon to lose money': A costly, questionable plan on the Willamette*, Oregon Public Broadcasting (Oct. 31, 2023), https://www.opb.org/article/2023/10/31/willamette-river-salmon-dams-army-corps-fish-collector-vs-drawdowns/.

[5] *Id.*

[6] Tony Schick, *'Killing salmon to lose money': A costly, questionable plan on the Willamette*, Oregon Public Broadcasting (Oct. 31, 2023), https://www.opb.org/article/2023/10/31/willamette-river-salmon-dams-army-corps-fish-collector-vs-drawdowns/.

Ending hydropower generation at the Willamette Valley Project dams is both the most cost-effective and biologically effective solution for improving fish passage. This approach would maintain the dams' primary function—flood risk management—while avoiding the need to invest hundreds of millions of dollars into engineered fish passage systems with uncertain outcomes. One such alternative under consideration by the Corps involves constructing a large-scale surface collection and conveyance system—essentially a floating fish guidance structure designed to aggregate and divert juvenile fish into a bypass system. However, this technology is unproven at the scale and conditions present in these reservoirs, particularly given the depth, temperature stratification, and flow variability in the Willamette system.

In contrast, a run-of-river operational model, enabled by discontinuing hydropower generation, would support more natural flow regimes, improve water quality, and facilitate volitional fish passage without the need for intensive human intervention or mechanical systems. Recognizing these benefits, Congress directed the Corps through the Water Resources Development Act of 2024 to thoroughly evaluate this option, acknowledging that continued hydropower operations no longer make fiscal or ecological sense. The Corps should prioritize this direction and pursue the decommissioning of hydropower as the most equitable and sustainable alternative—one that best serves ecological recovery, taxpayer interests, and the public good.

Thank you for the opportunity to comment,

Michelle Emmons
Co-Executive Director and Upper Willamette Riverkeeper
michelle@willametteriverkeeper.org

Heather King
Co-Executive Director and Lower Willamette Riverkeeper
heather@willametteriverkeeper.org

Herod, Megan K CIV (USA)

From: Robert Chandler <RChandler@cityofsalem.net>
Sent: Friday, June 20, 2025 4:32 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Public Comments
Attachments: 2025-06-20 City of Salem Comments on USACE SEIS.pdf

Submitted on behalf of the City Manager:

Please find aı ached comments from the City of Salem regarding the Supplemental Environmental Impact Statement (SEIS) that the US Army Corps of Engineers is preparing. The City's comments are specific to the secı ons of the SEIS regarding the proposed deep drawdown of Detroit Reservoir in which the level of the reservoir is dropped to a historically low elevaı on to facilitate the out-migraı on of threatened fish species.

A hard copy of our comments was also mailed today through the U.S. Postal Service to your Portland address.

Thank you for your consideraı on.

Respecı ully,

Robert D. Chandler, PhD, PE
Assistant Public Works Director
City of Salem | Public Works Department
555 Liberty St SE, Suite 325, Salem OR 97301-3515
rchandler@cityofsalem.net
Office: 503-588-6008
Facebook | Twitter |YouTube| CityofSalem.net

CITY OF Salem
AT YOUR SERVICE

CITY MANAGER'S OFFICE
555 Liberty St SE / Room 220 • Salem, OR 97301-3513 • 503-588-6255 • Fax 503-588-6354

June 20, 2025

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946
Portland, OR 97208-2946

Re: City of Salem Public Comments on USACE Proposed Detroit Reservoir Drawdown

This letter and the attached memorandum provide comments from the City of Salem (City) to the US Army Corps of Engineers (USACE) regarding the Supplemental Environmental Impact Statement (SEIS) the USACE is preparing. The SEIS addresses two issues: (1) a permanent end to hydropower production at Willamette Valley Dams, as directed by the Water Resources Development Act of 2024, and (2) a deep drawdown of Detroit Reservoir, as published in the Biological Opinion (BiOp) issued in December 2024 by the National Marine Fisheries Services (NMFS). The City's comments are specific to a deep drawdown in which the level of Detroit Reservoir is dropped to a historically low elevation of 1,395 feet in the fall/winter in a single, continuous operation to facilitate the out-migration of threatened fish species.

To begin, the City firmly supports the efforts of USACE, NMFS, and others that improve passage through Detroit Dam for spring Chinook and winter steelhead, both of which are listed as threatened under the Endangered Species Act (ESA). The City also recognizes and respects the historic, cultural, and spiritual interests these species represent to the tribal nations. However, the City cannot support a deep drawdown conducted as proposed in the BiOp because it will cause excessively high levels of turbidity in the North Santiam River which will put at risk the City's drinking water system. The attachment provides additional details and considerations to the City's comments below.

1. **As proposed, the deep drawdown puts in danger public health, public safety, and the regional economy because of the risks it places on the City's drinking water system.**
   The City is the only regional water provider in the Mid-Willamette Valley and is responsible for supplying safe and reliable drinking water to approximately 200,000 individuals and thousands of customers that include hospitals, schools, businesses, industries, irrigators, multifamily housing units, and single-family homes. The City's water service area includes the City of Salem, the City of Turner, four water districts, and portions of unincorporated Marion and Polk counties. In addition, the City must provide water in sufficient quantities for firefighting and other emergency needs. Moreover, the City is the only emergency source of drinking water to the City of Stayton and the City of Keizer should either, or both, municipalities suffer impairment to their drinking water system.

   There is little question that the deep drawdown will elevate turbidity levels in the North Santiam River. The City's operational procedure in the event of high turbidity involves filling the slow sand

filters to their maximum capacity and then closing the intake gates. With the gates shut, the filters can operate for no more than three days before being shut down because of low water levels. Historically, high turbidity events that triggered this procedure lasted less than three days. However, if high turbidity levels persist and the gates remain shut, the City must rely on remaining volumes in our reservoirs, several groundwater wells, the aquifer storage and recovery system, and an intertie with the City of Keizer. We estimate that these alternative water sources can marginally meet the projected water demand during the timeframe of the proposed drawdown. However – and this is a significant consideration – under this mode of operation there is *no redundancy* in the system. Should a critical component of one or more of these alternative sources fail, our ability to supply water will fall below the demand and our customers would be faced with untenable and unsustainable risks to life, property, and livelihood.

The City is conducting research to determine the limitations and feasibility of keeping the intake gates open to allow high-turbidity surface water into the slow sand filtration system. Bench-scale testing is being carried out to evaluate the relationship between intake turbidity and filter performance. The results will help inform decision-making on how best to manage high-turbidity events triggered by the drawdown. Our research is continuing but based on the preliminary results, at a turbidity level of 50 Nephelometric Turbidity Units ("NTU") we expect complete loss of filter performance within one week to ten days. If turbidity exceeds 50 NTU, in which is likely based on other drawdown operations conducted by the USACE, we expect our filter performance will degrade within days. Restoring a filter to full operational status may require months to drain the water, remove the clogged layer of sand, replace the bed with new sand if necessary, and restore the biological layer in the rebuilt filter bed. In addition, rehabilitating filters lost to sustained turbidity as a result of the drawdown operation is a laborious effort and has the real possibility of reducing the City's ability to meet peak summer demands as the filters remain offline for the duration of the work.

2. **As proposed, the deep drawdown will result in violations of federal law.**
The National Environmental Policy Act (NEPA) requires the lead agency, in this instance NMFS, to rigorously evaluate reasonable alternatives. However, the BiOp does not thoroughly analyze alternatives other than the drawdown. Further, the BiOp does not thoroughly consider the degree to which the degradation of water quality would impact users, including our water customers, or how the drawdown might impact other aquatic species in the basin. The failure to more fully consider these impacts is notable given that the USACE and NMFS are aware that the elevated turbidity will have dramatic and adverse impacts on the City's drinking water infrastructure.

The Clean Water Act (CWA) addresses, among many other things, contaminants in water resources. Causing high levels of turbidity is a clear violation of the CWA. Typical turbidity levels at the City's intake from the North Santiam River are well below 10 NTU. The anticipated turbidity during the drawdown is expected to be well in excess of 100 NTU. In the EPA-approved Oregon Water Quality Standards "turbidity" is defined as "pollution" and the standard in ORS 340-041-0036 states, in part:

Turbidity (Nephelometric Turbidity Units, NTU): No more than a ten percent cumulative increase in natural stream turbidities may be allowed, as measured relative to a control point immediately upstream of the turbidity causing activity.

The Safe Drinking Water Act (SDWA) requires persons to protect public water systems. The proposed drawdown would likely contaminate the City's source of drinking water, potentially contaminate the

City's water treatment system, and generally impair the City's ability to provide safe drinking water, any one of which could constitute a violation of the SWDA.

Given the many considerations, the City recommends the SEIS incorporate, at minimum, the following:

1. Developing a stepwise approach to the annual drawdown. It is imperative to avoid a scenario in which the elevation of Detroit Reservoir is continuously and without pause dropped to the target level of 1,395 feet *regardless* of downstream water quality, *regardless* of impacts to aquatic species, and *regardless* of the attendant harm to the City's drinking water system. A stepwise drawdown conducted in successive years, coupled with turbidity triggers (see below) would help fill many critical information gaps. These include: (1) How fast and how high will turbidity levels rise during the drawdown? (2) How quickly will turbidity levels drop once drawdown operations cease? (3) How long will it take before turbidity levels sufficiently decrease for the City to resume drawing water from the river?

2. Establishing turbidity levels that trigger a clear and decisive response. The purpose of this recommendation is to balance the USACE's need to perform a deep drawdown with the impacts and duration of those impacts on the City's water system. Turbidity triggers could provide a degree of certainty and significantly enhance the City's ability to develop contingency and recovery plans. One approach to developing turbidity triggers would be to establish a specific turbidity at which the USACE would cease drawdown operations, commence refilling the reservoir, and conduct no further deep drawdowns until the following year or complete recovery of the City's water treatment system, whichever is later. This recommendation comes with a commitment by the City to work with the USACE and to share information, data, and research results (see above) to help develop turbidity triggers that reflect current scientific research and sound engineering practices.

3. Evaluating the merits of delaying implementation. The SEIS should evaluate potential environmental impacts if the deep drawdown is delayed for one, two, or three years hence. Doing so would provide the City additional time to identify locations, obtain funding, and construct enough wells with sufficient yield to provide resiliency and mitigate risks to life, property, and livelihood.

4. Creating a long-term strategy. The BiOp requires development of an Adaptive Management Plan that includes "decision criteria" that guide strategies (see Section 2.5.10 of the BiOp). At issue is the City's need for the USACE to incorporate decision criteria that can be modified over time based on new information, changes in conditions, and lessons learned. More specifically, decision criteria should consider changes in risks and consequences from year to year. To illustrate, consider two scenarios. (1) The City's risk assessment is based, in part, on historic water demand. If the City adds a new industrial customer with a high, *year-round* water demand, the risks/consequences assessment will be altered. (2) The City's water system relies on a wide range of factors and components to deliver safe drinking water to our customers. If, prior to commencing a deep drawdown, one or more of our critical components has failed, decision criteria should be in place that delays or cancels the deep drawdown.

   Further, the BiOp instructs the USACE and NMFS to coordinate a review of the 2017 engineering design report for Detroit Dam downstream fish passage via a floating screen structure, to be initiated in early 2026 (see RPA 4.13.5). The Action Agencies will complete construction of structural fish passage facilities by December 2033. By March 2034, the Action Agencies will begin operating downstream fish passage facilities at Detroit that enable collection of steelhead and Chinook salmon from above Detroit, with volitional passage of transport to

habitat downstream of Big Cliff Dam. The City is adamant that the USACE adhere to these timelines to ensure a long-term plan is enacted for downstream passage that does not present an annual threat to the City's drinking water supply.

In summary, and for the reasons stated, the City has no choice but to stand in opposition to the deep drawdown of Detroit Reservoir as proposed in the BiOp unless the heightened risks and substantial consequences of failure can be mitigated. Our position on this matter is regrettable given our long-standing support for the endeavors of the USACE and others, including our own work, to protect endangered species. However, we *must* give equally significant consideration to the health, life, safety, and livelihood of our customers and our region. Simply put, the risks to the City's water supply created by the deep drawdown are too high and consequences of failure are too staggering to accept. Regardless of our current opposition, the City commits to working with the USACE and others to evaluate and, ultimately, to implement measures that contribute to downstream passage of juvenile species, protect habitat and water quality, and support the many users of the North Santiam River.

Sincerely,

Krishna Namburi

Krishna Namburi
Interim City Manager

Attachment: "City of Salem Public Comments on USACE's Proposed Detroit Reservoir Drawdown." *Memorandum*. Davis Wright Tremaine, LLP. June 17, 2025

cc:

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MEMORANDUM

To: U.S. Army Corps of Engineers, Portland District
From: Davis Wright Tremaine, LLP on behalf of City of Salem
Date: June 19, 2025
Subject: City of Salem Public Comments on USACE's Proposed Detroit Reservoir Drawdown

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On May 16, 2025 the U.S. Army Corps of Engineers ("USACE"), Portland District, published a press release seeking public comments as part of a Supplemental Environmental Impact Statement ("SEIS") focused on two new requirements related to the operations and maintenance of the Willamette Valley System ("WVS") of dams and reservoirs, including implementing a deep fall drawdown of Detroit Reservoir. This memorandum provides the City of Salem's (the "City") comments on the proposed drawdown that the City understands to refer to a proposal to draw Detroit Reservoir down to 1,395 feet in the December 26, 2024, Biological Opinion for the Continued Operation and Maintenance of the Willamette Valley System (the "BiOp") prepared by the National Marine Fisheries Service ("NMFS").

The City has a strong interest in this matter and intervened in prior litigation regarding potential changes to the WVS that would impact its drinking water supply. As a result of that litigation, the court specified interim measures (including drawdowns) that the City found acceptable. The BiOp's proposed elevation target for the drawdown at Detroit Reservoir goes much further than those previous measures and USACE is seeking input from the public on what impacts should be investigated prior to the drawdown.

At the outset, the City is emphasizing its overall support of efforts by NMFS, USACE, and others to protect and benefit listed fish species and the environment, including iconic fish species of the Pacific Northwest. The City also recognizes and supports tribal interests in those resources, including the Confederated Tribes of Grand Ronde and other tribal nations in the salmonid species, their habitat, and the environment. However, the City opposes the proposed drawdown as described in the BiOp and as scheduled because it would violate the National Environmental Policy Act ("NEPA"), the Clean Water Act ("CWA"), and the Safe Drinking Water Act ("SDWA"), and would result in unacceptable risks to the City's drinking water infrastructure. USACE's proposal is particularly troubling because other alternatives exist to benefit listed fish species that would allow USACE to comply with the Endangered Species Act ("ESA"). USACE's drastic proposal is the result of the agency's own repeated failure to comply with the ESA for more than a decade and may jeopardize the water supply for over 200,000

Oregon residents, as well as threaten access to safe water for schools, hospitals, firefighters, and other essential services. USACE's decision to favor the drawdown as an interim measure seems to be guided by economic considerations and may pose a risk to public health for one of the most populated areas of the state. NMFS and USACE should consider alternatives to the proposed drawdown that would allow the agencies to comply with the ESA without putting the City's water supply at risk. The City strongly believes that USACE can and should find alternatives to the proposed drawdown allowing maximum benefit for listed fish species while protecting drinking water supplies for the City's residents. As part of those efforts, the City encourages the Corps to consider and study a stepped approach to the drawdown that would protect water quality in the North Santiam River. The City's comments first summarize the potential impacts of the drawdown on its water supplies, then address the lack of considerations for those impacts in the BiOp, and finally discuss the legal implications of the drawdown in the context of NEPA, the CWA, and the SDWA.

I. The Proposed Drawdown Creates an Unacceptable Risk of Public Health Emergency

a. Background on the City's Water Supply

For more than 80 years, the North Santiam River—where the Detroit Dam and Reservoir are located—has served as the primary drinking water source for the City of Salem. The City relies on the North Santiam River for water to serve over 200,000 customers and three wholesale customers: the City of Turner, Suburban East Salem Water District, and Orchard Heights Water Association. The City also provides emergency water supply connections to the Cities of Stayton and Keizer or an additional 47,000 residents.

The City's drinking water treatment plant (the "Treatment Plant") is located on Geren Island in the North Santiam River, approximately 30 miles downstream from Detroit Dam. The high-water quality of the North Santiam River allows the City to use slow sand filtration as the core treatment process. Slow sand filtration is a natural filtration process, allowing naturally existing biota in the river to form a biological layer which then degrades and/or removes particulates and microbial contaminants in the water. This process uses locally sourced native materials that are reusable and recyclable, providing environmental and ecological benefits. Under normal operating conditions, the slow sand filters are operated without pretreatment. Historical operation of the Treatment Plant indicates that a raw water turbidity (the measure of water clarity or how much matter is suspended in water) of less than 10 Nephelometric Turbidity Units ("NTU") is necessary. An engineering evaluation and literature review concluded that sustained turbidity greater than 10 NTU in the feedwater to a slow sand filter will lead to rapid head loss accumulation of filters, leading to excessive cleaning of filters which could become impractical for continued operation depending on filter run times. Slow sand filter subject experts have indicated the recommended sustainable feed turbidity to effectively treat water in slow sand filters is typically less than 10 NTU. These theoretical evaluations align with plant historical operating data.

During normal plant operations, filter run times are typically in excess of 3 months. These long run times allow the City operational flexibility to schedule filter cleaning and maintenance activities to avoid peak demand and/or challenging water quality conditions. During normal operation, cleaning and maintenance activities generally consist of both scraping and ripening. Filter scraping is completed by draining the respective filters, scraping 1/4-inch to 1/2-

inch of media off the top of the bed using machinery, then re-filling the filter. The overall scraping process normally lasts 3 to 5 days. Following scraping a filter is normally allowed to ripen before being placed into production. During the ripening period, which lasts anywhere from 1 week to 2 months, the filter develops a biologically active layer on top of the media, which is required to effectively produce potable water.

To quantify the impacts of the proposed deep drawdown to the Treatment Plant, the City has developed a series of bench and pilot scale tests based on anticipated water quality conditions as observed during similar regional drawdown activities in other comparable basins. Below is a summary of the preliminary results:

- Pilot testing confirmed what is suggested by the literature and plant historical data - turbidities above the recommended feedwater turbidity range (<10 NTU) significantly increase filter clogging and reduce filter run durations.

- Pilot testing of 50 NTU feedwater with native sediments collected from Detroit Reservoir at filter loading rates required to produce 20-25 mgd from the Treatment Plant, resulted in filter run times of 11-13 days, or ~88% reduction compared to normal conditions.

- Pilot testing of 100 NTU feedwater with surrogate sediments at filter loading rates required to produce 20-25 mgd from the Treatment Plant resulted in filter run times of 9 days, or 93% reduction compared to normal conditions.

- Preliminary results at higher turbidity loading verify this trend.

- Results from the pilot testing were obtained under controlled laboratory conditions. It is expected that actual run times will be shorter than what has been observed.

Sustainably producing adequate potable water at these reduced run times for an extended duration is unlikely. Significantly reduced filter run durations will lead to a significant increase in annual operating expenses while increasing the load on already heavily burdened City staff and resources. In addition to immediate increased operational costs from filter cleaning, there are longer term cost impacts associated with increased turbidity loading. Pilot results indicate the nature of solids removal during the drawdown period will require deeper sand removal from filters compared to normal cleaning activities and will therefore increase the need for and the frequency of filter re-sanding. Re-sanding is required when sand depths in a filter reach a critical minimum value to ensure effluent water quality meets all drinking water standards and treatment goals. Supplies of additional filter sand, to replace the excessively scraped sand, are also limited and costly to procure, and adding sand to a filter is a costly (estimated at between $2 and $3.5 million for each filter) and time-consuming process, typically only occurring every 10 or more years during normal operation.

The Treatment Plant is capable of handling short-term turbidity events of a few days, which are frequently caused by unregulated flows in the fork of the river where the Treatment Plant's intake is located. In such instances, the intake to the City's Treatment Plant is shut and the City relies on limited back-up water supplies and in-town finished water storage. The City may

also rely on temporary alterations of operations to mix groundwater (which itself may be impacted by surface water quality) with the river water. However, the City's back-up supplies of water are limited and still rely on treatment from the Treatment Plant. As a result, if high turbidity levels persist beyond a few days, the City's inability to normally operate its Treatment Plant for an extended period would create a significant risk to the City.

b. The Proposed Drawdown and Impacts on the Treatment Plant

Turbidity in the river water is a problem for the City's water supply because 1) it may force a shutdown of the Treatment Plant, and 2) the turbidity and other pollutants may be too high for the treatment process to effectively remove it to drinking water standards and regulations. The result could produce water for the City's customers that violates standards set by the SDWA. Currently, the water level in Detroit Reservoir is maintained at no lower than 1,450 feet as established by USACE. In the summer, the water level elevation is approximately 1,560 feet. Lowering the water level to 1,395 feet in the fall and/or winter, as proposed in the BiOp, is likely to result in high levels of turbidity due to both scouring of settled solids in the Reservoir and precipitation events causing significant erosion to the newly exposed shoreline. Further, lower water volume means the suspended sediment remains more concentrated in the lake. A reduced water level in the Reservoir will allow for less settling time of suspended solids entering the Reservoir. As a result, much of the sediment may flow through the dam and downstream, creating high turbidity, as shown in the case studies summarized in subsection e) below.

The proposed drawdown would seriously exacerbate the problems described above—such as exposed shoreline erosion and low volume of reservoir water— creating a higher risk of excessively turbid water. Moreover, the drawdown conducted over multiple weeks creates a higher risk of sustained high-turbidity events and an unreasonable risk for the City and its ability to supply adequate potable water for its residents and customers. The impacts of drawing down the reservoir would not be limited to the fall or winter. If the reservoir is nearly empty into the spring, for example, it is unlikely to refill to the regular level of 1,560 feet during the summer, which would result in additional stress on the City's water supplies during peak demand times. As the weather gets warmer, the City's water needs more than double from approximately 25 million gallons per day to approximately 50 million gallons per day. If the Detroit Reservoir is near empty in late spring, the City would be largely reliant on natural flow levels of the river during dry months and simply may not have enough water to meet its customers' needs.

The City's Treatment Plant relies on flows that pass by the facility's intake structure in the river channel on the north side of Geren Island. In order for the Treatment Plant to function properly, the water level at this point of the river must be 2.3 feet or higher, which requires flows of 700 cubic feet per second (cfs) or greater. A sustained drawdown into the spring poses the threat that flow levels in the following months will not be sufficient for the facility to operate. Also, lower water elevations in the reservoir as the weather warms are likely to lead to higher water temperatures in the North Santiam River. Any deviations from normal water quality parameters may impact the operations of the Treatment Plant, including but not limited to changing the filter performance and chemical dosages. Higher water temperatures may also increase the occurrence and magnitude of algal blooms in Detroit Reservoir and the North Santiam River. Algal blooms negatively impact the water treatment process (and wildlife and the environment) by (1) clogging filters and inhibiting the City's ability to meet water demand, (2) producing algal toxins, and (3) creating taste and odor issues caused by Geosmin and 2-

Methylisoborneol (MIB). In summary, the proposed drawdown would be detrimental to water quality and the environment in the North Santiam River.

c. City's Alternative Water Supplies and Risk Scenarios

The City holds municipal water rights in the North Santiam River, and decreasing flows in the river as a result of drawdowns at Detroit Lake would interfere with those rights. If the City were to obtain alternative water supplies sufficient to mitigate the potential impacts described above, the process would take years, not months. Upon the release of the BiOp, the City immediately started studying the impact of the proposed drawdown on its water supply and assessed its ability to rely on alternative sources of water. While not final, the City's studies indicate that the Treatment Plant cannot sustainably accommodate the increase in turbidity that will result from the proposed drawdown. A preliminary operational impacts analysis resulted in the following findings:

- Sustained and peak turbidity of the North Santiam River will significantly increase because of the proposed drawdown, potentially up to a sustained value of 200 NTU based on regional case studies of similar events.

- As a result of the proposed drawdown, increased suspended solids concentrations will be deposited along the banks of the river, which may be re-suspended during future storm events, resulting in elevated turbidity into the Treatment Plant even when a deep drawdown is not actively occurring.

- Recent case studies show that water treatment facilities in similar basins have incurred increases in operational costs and encountered challenges meeting finished water quality goals because of increased raw water turbidity from similar drawdowns.

- The City's Treatment Plant is not designed to sustainably treat raw water sources with sustained turbidities above 10 NTU.

- Excessive filter scraping will reduce the stocks of available filter sands, leading to limitations on the Treatment Plant's production capacity.

- Elevated raw water turbidity events may lead to permanent capacity reduction until the entire filter sand bed is replaced, extending impacts beyond the time of initial turbidity loading.

During the anticipated drawdown events of the Detroit Reservoir, large amounts of organic and inorganic sediment will be exposed to changes in hydraulic patterns that have not been previously experienced. This will result in water quality impacts by changing suspended solids concentrations. Based on those findings, the City has been researching alternative water supplies in preparation of a potential shutdown of the Treatment Plant caused by the Reservoir drawdown. The City's water demand in the fall and winter months averages about 25 million gallons per day, with peak day demand reaching 27 to 28 million gallons per day. At full capacity, the City's existing groundwater supply system can provide up to 17 million gallons per day. The City may be able to secure up to 4.3 million gallons per day from the City of Keizer's water supply, if Keizer has excess supply available. This leaves the City short of at least 3 million gallons per day

to barely accommodate its demand, assuming that the groundwater system of wells can run at full capacity for long periods of time, which is unrealistic. During pilot tests, the City of Keizer connection that would be used by the City to provide up to 4.3 million gallons per day operated at full capacity for only two days before breaking down. Even with the additional supply from the City of Keizer and potential additional wells commissioned as part of the City's existing groundwater supply, the City would be operating without any redundancy, which would constitute an unreasonable and unacceptable risk to human health. Finally, the cost of relying on the City of Keizer's system and on additional wells is estimated at an additional cost of at least $6,600 per day.

In summary, unless the City takes extraordinary measures to mitigate the impacts, the proposed drawdown would cause irreparable harm to the City's infrastructure in such a way that could either (1) cause a shutdown of the treatment plant or (2) reduce the amount of water and water quality level to such a degree that adequate filtration of the water for health and safety may not be possible. In either scenario, the City would be unable to comply with the provisions of the SDWA and Oregon statutes adopting these standards and thus would be in breach of its duty to provide clean and safe drinking water. Additionally, the harm to the City's residents described above may harm the City's reputation and goodwill that cannot be adequately addressed by money.

d. General Impacts of the Drawdown on Water Quality

High loading of fine suspended solids in water entering the Treatment Plant is a significant risk to maintaining effluent quality below limits for drinking water. States and the EPA establish effluent water quality standards. In Oregon, drinking water quality standards are established under the Oregon Drinking Water Quality Act (OAR 333-061), which includes implementation of national drinking water quality standards (40 CFR 141.73 for turbidity requirements). To maintain public health, each contaminant has either an established maximum contaminant level (MCL) or a recommended treatment technique. For turbidity, the Treatment Plant must produce an effluent turbidity of less than 1.0 NTU 95 percent of the time and less than 5.0 NTU 100 percent of the time.

Multiple literature sources indicate that colloidal clays (i.e., fine sediment type of a diameter less than 2 μm, matching the most expected suspended solids type from the Detroit Reservoir drawdown) can cause higher effluent turbidity from slow sand filters compared to larger particle sizes (AWWARF, 1991; Collins, Youngstrom, and Broder, 2012; EPA, 2024). For example, in one set of pilot slow sand filters in a Boulder, Colorado experiment, the process only removed 20 percent of raw water turbidity when feedwater particles were primarily composed of colloidal clay particles. Elevated filter outlet turbidity can be correlated to decreased cyst and bacteria removal across the filters (AWWARF, 1991). The City's Treatment Plant may not be equipped to remove the biological particles due to the elevated turbidities corresponding with lower water levels in the Reservoir. In addition to risk of passage of biological particulates through the Treatment Plant, biologicals in the filtered water would also increase due to the shorter than normal filter run times expected. Shorter run times will lead to more frequent scraping of the sand filter, which limits the biological maturity of the filters and increases the chances of biological and particulate breakthrough. Accordingly, during a deep drawdown of the Detroit Reservoir, elevated turbidity and biological contaminants in the filtered water of the Treatment Plant are at risk of not meeting MCLs.

It is important to note that increased surface water turbidity could also impact groundwater quality of the City's groundwater sources, depending on the level of infiltration occurring in a specific location, which may be impacted by riverbed material, riverbed depth, and surface water quality. Finally, the proposed drawdown may impact the pH of water from the North Santiam River, which would impose a disproportionate burden on many food and beverage businesses served by the City.

e. Case Studies of Deep Drawdown Events

The impact to the City's Treatment Plant as a result of high turbidity is not just a hypothetical. Several water treatment plants designed for low turbidity raw water have been exposed to elevated raw water turbidity as a result of a deep drawdown of an upstream reservoir. These have consistently resulted in significant operational challenges, operational costs, and risks to finish water quality at the treatment plants:

- Deep drawdowns of the Green Peter Dam have occurred for the past two years on the South Santiam River, resulting in abnormally high turbidity levels in the water and leading to severe disruptions at treatment plants in Lebanon and Sweet Home. The City of Lebanon filed a claim for damages against USACE under the Federal Tort Claims Act on October 11, 2024, claiming $26 million in damages.

- The initial drawdown of the Cougar Reservoir, which feeds the McKenzie River, created severe operational challenges and treatment costs for the City of Eugene's Hayden Bridge Water Treatment Plant, with turbidity ranging from 50 to 200 NTU for a three-month period. Water quality was monitored during fall drawdowns of the Fall Creek Reservoir, showing recorded values of turbidity ranging from 501 to 814 Formazin Nephelometric Units (FNU). Turbidity remained elevated during the drawdown period for all years in which drawdowns were observed, with erosion and re-suspension of sediment as primary causes for the increased turbidity.

- With regard to the City's Treatment Plant, one noteworthy event provides valuable insight to the Treatment Plant's operations when raw water turbidity spikes in the North Santiam River. In February 1996, due to a 50+ year flood event in Northwest Oregon, the North Santiam River turbidity rose to values in excess of 100 NTU, leading to the shutdown of the Treatment Plant for eight days due to concerns of finished water quality not meeting safe drinking water standards. In response, the City issued a stage three water alert prohibiting the use of water outdoors and asking households and businesses to cut water use.

Those cases suggest that the proposed drawdown is likely to result in the type of impacts to the City's Treatment Plant that could shut down the Treatment Plant and jeopardize City's customers' access to safe drinking water.

f. Summary

In summary, the proposed drawdown will result in elevated raw water turbidity for extended periods of time, resulting in significantly shorter filter run times at the Treatment Plant. This, in turn, is likely to produce finished water quality that does not meet all MCLs and/or result

in a shutdown of the Treatment Plant. Despite its best efforts, the City may not be able to provide sufficient alternative water supplies to meet peak demand during the proposed drawdown periods and months following the proposed drawdown if the Reservoir does not fill back up as needed. As a result, the proposed drawdown may result in a public health emergency by jeopardizing access to safe drinking water for hundreds of thousands of residents, and for hospitals, schools and other public services.

II. USACE Did Not Properly Consider the Impacts of the Drawdown to the City's Water Supply

Under the ESA, lead agencies must identify reasonable and prudent alternatives to a proposed action. Those reasonable and prudent alternatives ("RPAs") are those that can be implemented consistent with the scope of the agency's legal authority and jurisdiction. 50 C.F.R § 402.02. In Section 8 of the BiOp, NMFS concluded that the continued operation of the WVS would jeopardize the continued existence of Upper Willamette River ("UWR") Chinook salmon and UWR steelhead and destroy or adversely modify their designated habitat. As a result, NMFS developed an RPA that it believes would avoid jeopardizing the continued existence for those species and avoid impacts to their habitat. The RPA is in fact comprised of a number of measures related to adaptive management, flow management, water quality management, fish passage, hatchery management, and habitat improvement. In the BiOp, the proposed drawdown is part of RPA 4 addressing fish passage and more particularly RPA 4.12 addressing juvenile downstream passage in the North Santiam Basin. As part of RPA 4.12.2, the BiOp provides the following:

> "[t]he Action Agencies will test and improve effectiveness of interim juvenile fall drawdown operations through Detroit and Big Cliff Reservoirs and Dams with the following operations in years 2025-2028, and will conduct studies to measure effectiveness, as part of the Adaptive Management process with input from the WATER Technical Teams:
>
> - In the fall, draw Detroit Reservoir elevation down to no more than 50 feet above upper RO for passage (1395 ft), when possible given hydrology and hydropower activity in the North Santiam and other subbasins.
>
> - Design and conduct a study, or use existing data, to optimize RO gate openings at Detroit for survival and reduced harm. While also considering temperature implications downstream, as well as turbidity effects."

The BiOp does not provide any information regarding alternatives that were considered in place of the Detroit Reservoir drawdown that could have met ESA objectives related to UWR Chinook salmon and UWR steelhead. The BiOp also does not discuss at all how the proposed drawdown would impact users in the basin, including the City. The failure to consider or discuss those impacts is even more glaring due to the fact that the USACE and NMFS know that the resulting elevated turbidity will have dramatic impacts on the City's drinking water infrastructure. In fact, after USACE implemented a similar drawdown at Green Peter Reservoir in 2023, the cities of Lebanon and Sweet Home experienced extreme operational costs, equipment damage, and were forced to implement costly pretreatment system upgrades due to elevated turbidity levels in the South Santiam River. The cities filed a tort claim against USACE to seek compensation for over $26 million in damages for Lebanon and over $11 million for Sweet Home.

While NMFS and USACE have a duty to comply with the ESA, this does not necessarily translate into a duty to move forward with the Detroit Reservoir drawdown. Agencies retain considerable discretion in choosing what specific actions to take in order to implement the mandatory goal of the ESA. NFMS's failure to consider alternatives to the drawdown that would not result in a public health emergency for over 200,000 residents is arbitrary, capricious, and inconsistent with its various mandates under federal law. The City has repeatedly expressed concern about the impacts that a drawdown at Detroit Reservoir would have on its drinking water supplies and NMFS seems to have ignored those impacts altogether.

III. USACE Has a Duty to Comply with All Federal Laws

Moving forward with the drawdown would likely violate NEPA, the CWA, and SDWA. Compliance with one statute (ESA) shall not come at the expense of another.

a. NEPA violation

The consideration of alternatives to a proposed action is the heart of the environmental impact statement. 40 C.F.R. § 1502.14. The alternatives section of an EIS should identify the reasonably foreseeable environmental effects of the proposed action. In doing so, the analysis should "sharply define the issues for the decision maker and the public and provide a clear basis for choice among options." *Id.* As part of its ESA duties, NFMS (the lead agency) must "[r]igorously explore and objectively evaluate reasonable alternatives to the proposed action, and, for alternatives that the agency eliminated from detailed study, briefly discuss the reasons for their elimination." 40 C.F.R. § 1502.14(a). NMFS has not addressed how the drawdown would impact water quality in the North Santiam River below Detroit dam and how the proposed action could have lasting effects on the health of the basin beyond the period of the drawdown itself. USACE and NMFS are required to consider and respond to the City's comments as part of its decision-making process and to consider alternatives to the proposed drawdown. Failure to do so would be a violation of NEPA.

b. CWA violation

The goal of the CWA is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." 33 U.S.C. § 1251(a). The CWA prohibits the discharge of any pollutant from a point source into navigable waters, unless the discharger possesses a valid permit authorizing the release of the particular pollutant discharged in the specific amount, or concentration, contained in the discharge. 33 U.S.C.A. § 1311. While courts have generally recognized that dams are not point sources and operators may not always be required to obtain a National Pollutant Discharge Elimination System (NPDES), it does not mean that USACE and NMFS have no obligation under the CWA. First, some courts have found that dam operators do not need an NPDES permit when dam operation does not involve an addition of a pollutant to navigable waters. *National Wildlife Federation v. Gorsuch*, 693 F.2d 156 (D.C. Cir. 1982); *National Wildlife Federation v. Consumers Power Co.*, 862 F.2d 580 (6th Cir. 1988); *accord Los Angeles Flood Control District v. Natural Resources Defense Council*, 568 U.S. 78 (2013). Second, USACE has been required to obtain an NPDES permit to account for the discharge of oil, grease, and heated water for certain dams on the Columbia River. In fact, USACE seems prepared to apply for an obtain NPDES permits for certain WVS dams in 2025. Third, USACE's obligations under the CWA may be implicated in this case where USACE's actions will directly result in polluted water being discharged from Detroit Dam, including high turbidity and increased temperature.

USACE and NMFS cannot ignore the CWA goals and mandates just to comply with the ESA. Courts previously rejected an argument by USACE that it was not able to comply with Washington water quality standards because of the Endangered Species Act and stated "the Endangered Species Act and the Clean Water Act 'should be read together, so that compliance with one statute does not come at the expense of the other.'" *Nat'l Wildlife Fed'n v. U.S. Army Corps of Eng'rs*, 132 F.Supp. 2d 876, 891 (D. Or. 2000). USACE's own policy is to meet downstream water quality standards whenever possible: "[w]hen releases are found to be incompatible with state standards they should be studied to establish an appropriate course of action for upgrading release quality, for the opportunity to improve water quality in support of ecosystem restoration, or for otherwise meeting their potential to best serve downstream water quality needs. Any physical or operational modification to a project (for purposes other than water quality) shall not degrade water quality in the reservoir or project discharges." *Nat'l Wildlife Fed'n v. U.S. Army Corps of Eng'rs*, 92 F. Supp. 2d 1072, 1076 (D. Or. 2000) (quoting USACE's *Digest of Water Resources Policies and Authorities*, Engineering Pamphlet 1165-2-1, dated February 15, 1996).

c. SDWA Violation

The SDWA, 42 U.S.C.A. §§ 300f et seq., establishes a federally mandated, state-administered regulatory scheme for the protection of drinking water. Its general purpose is to assure that the water supply systems serving the public meet minimum national standards for protection of public health. *Manufactured House. Inst. v. U.S. Env't Prot. Agency*, 467 F.3d 391, 394 (4th Cir. 2006). The Act regulates contaminants in drinking water supplied by public water systems and empowers the EPA to promulgate regulations protecting the quality of drinking water sources in the United States, which regulations specify dangerous contaminants and prescribe either maximum contaminant levels or satisfactory treatment techniques. It delegated to EPA the responsibility for setting the standards for drinking water contaminants, 42 U.S.C.A. § 300g-1. Under the statute, the EPA must regulate the majority of contaminants in drinking water by formulating maximum contaminant level goals (MCLGs), representing its expert determination of "the level at which no known or anticipated adverse effects on the health of persons occur and which allows an adequate margin of safety." 42 U.S.C.A. § 300g-1(b)(4)(A). It then must set a maximum contaminant level (MCL) "as close to the [MCLG] as is feasible." 42 U.S.C.A. § 300g-1(b)(4)(B). Generally, federal agencies are subject to and comply with all federal, state, interstate, and local requirements respecting wellhead protection area, public water systems and any underground injection in the same manner and to the same extent as any person is subject to such requirements. 42 U.S.C.A. § 300j-6(a). The proposed drawdown may impact the City's surface water and groundwater sources by dramatically increasing turbidity and other pollutants in the North Santiam River. Clean drinking water is a necessity and a failure to provide it can create irreparable harm. *See, e.g.*, *Concerned Pastors for Social Action v. Khouri*, 217 F. Supp. 3d 960, 972 (E.D. Mich. 2016) ("It is abundantly clear that the public relies every day on the ready availability of safe drinking water at the tap. . . . In modern society, when we turn on a faucet, we expect safe drinking water to flow out."). The action proposed by NMFS and the Corps would jeopardize access to clean drinking water for communities relying on the North Santiam River. USACE needs to take this into account when looking at different RPAs.

IV. Conclusion

As proposed in the BiOp for the WVS, the drawdown of Detroit Reservoir would dramatically increase turbidity in the North Santiam River at the time of the drawdown but also

potentially for months afterwards. This in turn could cause permanent harm to the City's drinking water infrastructure and impact hundreds of thousands of residents and businesses who rely on that water. The drawdown as proposed would violate the CWA and the SDWA, and NMFS and USACE's lack of consideration of those impacts would also violate NEPA. The City understands USACE's obligations under the ESA and is committed to the protection of listed fish species in the WVS and would like to work with USACE to find a solution that is protective of fish and wildlife *and* of the City's water supplies. The City also acknowledges and recognizes the Confederated Tribes of Grand Ronde's and other tribal nations' interest in the WVS and welcomes opportunities to speak with the tribes to find a solution. More specifically, the City's preliminary engineering studies suggest that its Treatment Plant could handle a turbidity of up to 50 NTU for up to 13 days before running into operational issues. As such, the City encourages the Corps to better study a stepped approach to the drawdown that would remain below such turbidity triggers to allow the City and the Corps to respond and adapt to changing water quality conditions and ensure continued access to safe drinking water for the City's residents and businesses.

Herod, Megan K CIV (USA)

From: Ryan Krabill <ryan@oregonfb.org>
Sent: Friday, June 20, 2025 10:06 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Greg Addington
Subject: [Non-DoD Source] Willamette Valley System SEIS Comments
Attachments: USACE WVS SEIS_comments - final.pdf

On behalf of the Oregon Farm Bureau, please accept the attached comments in response to the federal Notice of Intent to Prepare a Supplemental Environmental Impact Statement for the Operation and Maintenance of the Willamette Valley System. Thank you for your consideration.

Ryan J. Krabill

Government Affairs

(541) 414-5699

OFB Website | Join OFB today!

OREGON FARM BUREAU

Locally Grown and GROWING STRONG

June 20, 2025

U.S. Army Corps of Engineers (USACE)
Portland District
P.O. Box 2946
Attn: CENWP-PME-E (Supplemental EIS for the Willamette Valley System)
Portland, OR 97208-2946

Submitted via email to willamette.eis@usace.army.mil

To Whom It May Concern:

On behalf of the Oregon Farm Bureau (OFB), the state's largest general agricultural organization, we submit the following comments in response to the federal notice of the forthcoming *Supplemental Environmental Impact Statement (SEIS) for the Operation and Maintenance of the Willamette Valley System (WVS)*. While we acknowledge the limited scope of SEIS relative to the more extensive process, our comments are submitted in the larger context of the six-year study that resulted in USACE's Final Environmental Impact Statement (FEIS) published in April 2025.

OFB represents the interests of farmers, ranchers, and rural communities across Oregon—virtually all of whom are directly affected by decisions related to the management of the state's water, energy, and environmental infrastructure. While we recognize the statutory mandates driving this process and the importance of species conservation, we are deeply concerned by the implications associated with both the pending SEIS as well as the FEIS Preferred Alternative for the long-term viability of Oregon's agricultural economy, energy reliability, rural communities, and public health.

USACE's forthcoming SEIS proposes to address two additional federal requirements that materialized near the conclusion of the FEIS process, both of which are extremely concerning to OFB.

1. Legislation evaluating the permanent end to hydropower production at Willamette Valley dams,[1] and

[1] S.4367 – Thomas R. Carper Water Resources Development Act of 2024 (enacted January 1, 2025)

2. A National Marine Fisheries Service (NMFS) biological opinion (BiOp) prescribing a deeper fall drawdown of Detroit Reservoir as part of its proposed reasonable and prudent alternative.[2]

On the first point, hydropower in the Willamette Basin plays a critical role in delivering clean, renewable electricity to Oregon homes, farms, and businesses. It supports rural energy reliability, provides emergency power capabilities, and helps stabilize the regional grid. The concept of removing hydropower as an authorized purpose at any of the federal reservoirs is deeply concerning and, in our view, inconsistent with responsible environmental, energy, and economic planning.

As part of its analysis, we urge USACE to fully examine the wide-ranging implications, including:

a. Grid and Community Reliability: Many rural communities rely on islanding capabilities provided by dams like Cougar and Detroit during major grid disturbances or wildfire events. Removal of hydropower eliminates this resiliency without a viable replacement.
b. Ratepayer and Operational Impacts: Hydropower revenues support the operation and maintenance of the broader reservoir system. Ending power generation would likely increase operational costs for water users and ratepayers while eroding reinvestment in essential dam infrastructure.
c. Climate and Environmental Tradeoffs: Removing hydropower—a carbon-free, renewable energy source—without a proven, lower-impact alternative would undermine broader state and federal climate goals and force greater reliance on less sustainable energy options.
d. Loss of Public Value: Hydropower benefits not only rural Oregon but the broader public by producing local, affordable energy. Its removal would reduce the value of the multi-purpose system and shift burdens onto water users, taxpayers, and communities.

We ask USACE to weigh these real-world, measurable consequences against what is, at this stage, an undefined policy objective, and to proceed with utmost caution in evaluating this alternative.

Second, the NMFS BiOp directing a deeper fall drawdown at Detroit Reservoir presents equally serious concerns. While OFB supports reasonable species recovery efforts, those efforts must not come at the expense of reliable water storage, public health, and rural economies—especially when the anticipated benefits to fish populations remain uncertain. Key concerns include:

[2] NMFS No. WCRO-2023-00324 (dated December 26, 2024)

a. Water Security: Deeper seasonal drawdowns risk undermining spring refill, reducing the volume of water available for irrigation, municipal use, and hydropower production during critical demand periods.
b. Drinking Water and Water Quality: Lower water levels increase turbidity, encourage sediment release, and exacerbate harmful algal blooms. These effects directly threaten public drinking water systems in the Santiam Canyon and the City of Salem, posing health and other risks to residents. Previous, similar actions taken by USACE at Foster and Green Peter Reservoirs offer an informed view of expected outcomes.
c. Fire Suppression: Detroit Reservoir is a strategic water source for aerial firefighting during Oregon's wildfire season. A deep fall drawdown would limit access to this resource at a time of peak vulnerability.
d. Local Economic Impact: Detroit Lake supports a robust seasonal tourism economy, including boating, fishing, and hospitality services. Lowering the reservoir earlier and to historically low levels will severely limit recreational access, threatening businesses and jobs that are still recovering from the 2020 wildfires.

As the Corps proceeds with this SEIS, we urge a rigorous, science-based review that includes modeling of hydrologic variability, drought resilience, and socioeconomic consequences—not just potential ecological gains.

OFB supports thoughtful, balanced stewardship of Oregon's water and energy resources. However, we remain deeply concerned that the current trajectory—eliminating hydropower and drawing down reservoirs to levels with known and serious impacts—prioritizes theoretical outcomes over demonstrated, longstanding public benefits.

We ask the U.S. Army Corps of Engineers to ensure that the SEIS:

- Fully and transparently evaluates the comprehensive, long-term impacts of both proposals,
- Engages agricultural, municipal, and rural community stakeholders throughout the process,
- Includes detailed alternatives that minimize harm to water reliability, power supply, and public health, and
- Seeks measurable benefits to both human and ecological systems before proceeding with irreversible changes.

As previously noted, the SEIS is difficult to consider outside of the larger, more extensive FEIS context. With that in mind, please accept our additional observations associated with the original six-year environmental review of the WVS.

1. Choosing Certainty Over Speculation
   The FEIS rests on the premise that deep seasonal drawdowns and structural modifications will improve habitat conditions and support ESA-listed fish recovery.

However, the biological benefits remain unproven, with significant uncertainty surrounding population performance, passage efficacy, and long-term habitat response. These speculative outcomes are being pursued at the expense of real, measurable, and immediate benefits to water users, power reliability, drinking water quality, and rural economies. To prioritize theoretical ecological gains over tangible human, agricultural, and environmental needs is to do a disservice not only to science but also to the state of Oregon. We strongly urge USACE to weigh more carefully the burdens imposed on Oregonians—especially those in rural and agricultural communities—against the uncertain benefits outlined in the Preferred Alternative.

2. Water Security for Agriculture and Communities
   The FEIS identifies significant risks to the Willamette Basin's water storage and refill capacity, especially at key reservoirs such as Detroit and Green Peter. Seasonal drawdowns and operational constraints are projected to reduce available irrigation water during critical growing periods and to impair municipal supply in drought years. For agricultural producers and rural communities alike, this is not an abstract concern. It is a matter of economic survival. Oregon's farms depend on reliable seasonal storage. Without it, crop production, livestock operations, and food processing suffer—putting livelihoods and food security at risk.

3. Erosion of Hydropower and Rural Energy Reliability
   The Preferred Alternative threatens the functionality and viability of existing hydropower facilities, particularly Cougar and Green Peter Dams. These structures not only generate renewable electricity, but also provide critical backup power for isolated rural communities. Under the proposed plan, deep drawdowns could compromise islanding capabilities and degrade power production across the system. As Oregon seeks to expand clean energy and modernize rural infrastructure, undermining hydropower—our most established renewable base load source—is a step in the wrong direction.

4. Drinking Water and Public Health
   The FEIS acknowledges that increased turbidity, sediment, and harmful algal blooms are expected under the Preferred Alternative at reservoirs that serve as primary drinking water sources. These risks will impose new costs on water providers and create avoidable threats to public health—especially for small and rural communities that lack the resources to install expensive treatment infrastructure. Ensuring clean and reliable drinking water should remain a non-negotiable priority in any environmental planning process. Acknowledging the adverse outcomes from similar drawdowns at Foster and Green Peter Reservoirs on dependent municipal water providers is essential to this discussion.

5. Economic Displacement and Wildfire Risk
   Drawdowns at key recreation reservoirs—including Detroit, Lookout Point, and Cougar—are forecast to reduce access during peak seasons. This undermines local economies built around tourism and outdoor recreation and increases the risk of unmanaged dispersed camping, which in turn elevates wildfire ignition threats. This is not simply a recreational inconvenience. It is a direct challenge to the economic stability, public safety, and land stewardship efforts of already strained rural counties.

6. Lack of Adequate Adaptive Safeguards
   While the FEIS identifies unavoidable adverse effects in nearly every category—from water supply and visual resources to transmission reliability and economic viability—it offers few guarantees that these consequences will be effectively monitored, mitigated, or reversed. The proposed 30-year implementation timeline requires robust, transparent, and locally accountable adaptive management. Currently, those safeguards appear vague and unenforceable. We recommend a stronger commitment to stakeholder-driven adaptive planning that includes clear benchmarks, meaningful corrective triggers, and equitable representation for agricultural, municipal, and rural community voices.

Conclusion

Thank you for the opportunity to provide comment. We stand ready to contribute to a constructive dialogue that upholds Oregon's environmental goals without compromising its agricultural and rural future. OFB appreciates the complexity of managing the WVS and recognizes the challenges of balancing multiple authorized purposes. However, the Preferred Alternative, as currently designed, sacrifices too much—jeopardizing Oregon's farms, families, and foundational infrastructure based on theoretical ecological projections rather than demonstrable benefit. Furthermore, the additional elements for analysis in the pending SEIS unnecessarily promote further imbalance and instability in the region and are highly concerning. Oregon's future must not be built on tradeoffs that undermine food production, energy stability, and rural vitality in the name of unproven gains. We urge the U.S. Army Corps of Engineers to reconsider the balance of interests reflected in these plans and to pursue a more equitable, science-based path forward.

Respectfully submitted,

Ryan J. Krabill
Oregon Farm Bureau

Herod, Megan K CIV (USA)

From: GOLDRICH-MIDDAUGH Grace * DEQ <Grace.GOLDRICH-MIDDAUGH@deq.oregon.gov>
Sent: Friday, June 20, 2025 8:49 AM
To: CENWP-PME-Williamette-Valley-System-EIS; Oliver, E A (Liz) CIV (USA)
Cc: WIGAL Jennifer * DEQ; TUGAW Heather * DEQ; CREUTZBURG Brian * DEQ; REIS Kelly E * ODFW; MUCKEN Alyssa M * WRD; Lawrence Schwabe; Keri Handaly; Michael.Karnosh@grandronde.org; Anne Mullan; Jim Myers - NOAA Federal; Hudson, Michael; Kintz,Jesse H (BPA) - PG-5; Josie Thompson; Kate Wells; HIBBS Rob * ODA; Panwhar Samina T; Kate Self; Daniel J Spear (BPA) - PGB-5
Subject: [Non-DoD Source] DEQ comments on Willamette Valley System SEIS Scope
Attachments: Signed_DEQ_ScopingComments_SEIS_06182025.pdf

Hello Liz,
Thank you for the opportunity to participate in development of the SEIS. Please find attached DEQ's comments on the WVS SEIS Scope.

Best,
Grace

Oregon
Tina Kotek, Governor

Department of Environmental Quality
Headquarters Office
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5263
TTY 711

June 18, 2025

U.S. Army Corps of Engineers *via email to Liz.Oliver@usace.army.mil*

Portland District, Willamette Valley System EIS

ATTN: Liz Oliver, Project Manager

RE: Willamette Valley System Supplemental Environmental Impact Statement

Dear Liz Oliver:

The mission of the Oregon Department of Environmental Quality (DEQ) water quality division is to protect and improve water quality and to keep the State's water safe for uses such as drinking water, fish habitat, recreation and irrigation. The DEQ strives to engage partners like the U.S. Army Corps of Engineers to protect Oregon's water quality. As a part of this engagement, DEQ appreciates the opportunity to provide scoping comments on the Willamette Valley System Supplemental Environmental Impact Statement. DEQ also appreciates the extension of time to provide comments and the efforts by USACE to share relevant information and considerations with cooperating agencies at this stage of SEIS development. These comments reflect the perspective of DEQ, and other state agencies may provide additional input.

DEQ submits the following comments and questions for your consideration:

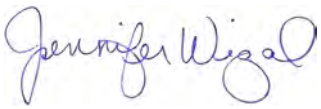
- For each reservoir, present the predicted effects of deauthorization scenarios to beneficial uses including fish passage, water quality and quantity, short-term and long-term project economic costs, flow management flexibility, etc.
    - The SEIS should clarify the assumptions used to evaluate deauthorization scenarios, including the partial deauthorization scenario that maintains incidental hydropower generation capability.
    - Flexibility in dam operations for fish passage, water quality, and water supply should be included in the alternative presented in the SEIS. Operational flexibility should be considered during development of the SEIS and can be added to information provided in the FEIS to revise a Preferred Alternative.
    - Reservoir management is affected by year-to-year variation in precipitation. Include modeling to inform management during normal, dry, and wet years and highlight the trade-offs for fish passage, water quality, and water supply with and without hydropower generation in WVS reservoirs.

    - Identify any differences in the number of years where operations are projected to meet main stem flow targets under the RPA from the FEIS versus under the SEIS scenario.
    - The SEIS should include an implementation timeline for operation and infrastructure modification should be included in the SEIS.
    - Report the changes to operations and utility of re-regulating reservoirs under deauthorization scenarios and the impact of these changes on water quality parameters including temperature, total suspended solids (TSS), and total dissolved gas (TDG).
    - Deauthorization of hydropower may affect surface water temperatures, TDG, pH, dissolved oxygen, sediment quantity and quality, and nuisance algae. Forecasted changes in these important water quality parameters should be used to inform revised operations and maintenance to meet Oregon's water quality standards. Water quality conditions can be found in the Integrated Report and Status and Trend Report.
- Analyses to explore tradeoffs between beneficial uses of water (such as drinking water, water supply, and recreation) and benefits to listed fish should be considered during drawdowns of Detroit Reservoir.
    - These analyses should include discussion of chemical and physical sediment characteristics, and estimation of sediment transport rates and volumes during drawdowns.
    - Analyses should also consider the effects of varied ramping rates, drawdown durations, drawdown timing, and a multi-year stepwise approach to reaching the target minimum elevation on TSS, temperature, and TDG.
    - Report how operations during the deep drawdown may be altered during different hydrologic conditions and the impacts of these operations on temperature, TSS and TDG.
    - Harmful Algal Blooms (HABs) remain a concern at Detroit Reservoir. The timing and duration of drawdowns may affect HABs and the impacts should be considered when drawdowns are planned.
- Changes to reservoir operations can influence the mobilization and transformation of inorganic mercury and methylmercury. Deauthorization and deep drawdowns may affect these mercury dynamics. Understanding and predicting how reservoir operations might be altered to reduce methylmercury production and bioaccumulation will be an important component of any contemplated O&M changes.
- Strategies to meet the Load Allocations in a TMDL are designed to ensure that water quality is restored in impaired waters. These strategies (found in Water Quality Management Plans associated with the 2019 Willamette Mercury TMDL and 2024 Willamette Subbasins Temperature Replacement TMDL) include measures to control existing sources of pollution or to offset predicted additional loading due to potential changes to O&M.

- The SEIS should include pollution control strategies if additional pollutant loading is predicted due to changes to O&M.
- Identifying strategies should involve analysis of individual water bodies and associated water quality standards and pollutants of concern. A list of impaired waterbodies potentially affected by the project can be found on the State of Oregon's most current EPA approved 303(d) list.

Thank you for your consideration and please reach out to Grace Goldrich-Middaugh, grace.goldrich-middaugh@deq.oregon.gov, with any questions regarding these comments.

Sincerely,



Jennifer Wigal

Water Quality Administrator

Herod, Megan K CIV (USA)

From: Brent Stevenson <BrentS@santiamwater.gov>
Sent: Thursday, June 19, 2025 2:56 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Julia Hajduk
Subject: [Non-DoD Source] SEIS comments SWCD
Attachments: SWCD WV SEIS Comments 2025.docx

Dear Ms. Oliver

Please accept our attached comments for the record

Brent Stevenson | General Manager
Santiam Water Control District
284 East Water Street | Stayton, Oregon 97383
503.769-2669|FAX: 503.769-5995
brents@santiamwater.gov
www.santiamwater.gov

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SANTIAM WATER CONTROL DISTRICT
284 E Water St, Stayton, OR 97383

Public Comment Letter on the SEIS for the Willamette Valley System
Santiam Water Control District (SWCD)
June 19, 2025

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946
Portland, OR 97208-2946

RE: Comments on the Supplemental Environmental Impact Statement (SEIS) for the Willamette Valley System

Dear Ms. Oliver,
The Santiam Water Control District (SWCD) is grateful for the opportunity to provide comments on the Supplemental Environmental Impact Statement (SEIS) for the Willamette Valley System. As an organization holding significant water rights and delivering critical water services to diverse stakeholders—including agricultural, municipal, and environmental sectors—we are deeply invested in ensuring the SEIS addresses the needs of all water users while adhering to environmental regulations.

Key Concerns and Recommendations

Reservoir Refill and Water Allocation

The SEIS should explicitly analyze how proposed drawdowns could impact the likelihood of reservoirs adequately refilling for subsequent water rights allocations. A thorough evaluation of the reduced probability of reservoir refilling and its implications for both water users and ecosystem needs is indispensable to informed decision-making and equitable water management.

Tributary-Specific Impacts

A detailed tabulation of storage amounts and releases for Detroit Reservoir and North Santiam River should be included to clarify tributary-specific impacts. The SEIS must explain the anticipated water management framework, including whether stored water intended for fish passage or other ecological purposes is sourced from allocations designated for fish and wildlife. It should also explicitly reference how such releases will be accounted for in the total water availability budget, ensuring transparency and equitable management of water resources. Additionally, sufficient information should be provided to determine if adequate flows for all needs—including agricultural, municipal, environmental, and instream purposes—will be met, with emphasis on Detroit Reservoir and North Santiam River.

Use of Accurate and Up-to-Date Data

The SEIS should rely on up-to-date and precise datasets, clearly presenting all assumptions and data in an understandable manner. The Corps' hydraulic model is an essential tool for evaluating system operations and addressing the needs of stakeholders, as well as assessing economic and ecological impacts. Incorporating the 2020 Modified Flow Dataset is vital to ensure accurate analysis.

Biological Opinions (BiOps) and Water Availability Analysis

The SEIS must detail the relationships among the 2008, 2019, and forthcoming Biological Opinions (BiOps) to help affected water users understand the potential impacts. Additionally, the SEIS should clarify whether the Corps has conducted the required analysis of available water under the moratorium on contracts in the Santiam Basin and indicate whether the moratorium will be lifted or if further actions are required.

Sediment Releases and Water Quality

The City of Stayton has raised significant concerns regarding the potential for sediment releases into the North Santiam River, which could compromise the City's drinking water treatment plant. As the Santiam Water Control District (SWCD) provides raw water to Stayton's drinking water plant, it is imperative that these risks to public health and safety are effectively addressed. The Corps must outline specific mitigation strategies to ensure continued provision of clean, safe water. Furthermore, cities like Stayton and other regional entities, alongside the SWCD, have obligations to implement Total Maximum Daily Load (TMDL) plans for water quality. The SEIS should include a comprehensive analysis of how sediment releases may affect the ability to meet TMDL goals, with particular focus on mercury contamination. This analysis is essential to ensure compliance with water quality standards and to develop strategies that minimize negative impacts on drinking water supplies, public health, and ecosystems.

TMDL impacts

Cities like Stayton and other regional entities, alongside the Santiam Water Control District (SWCD), have obligations to implement Total Maximum Daily Load (TMDL) plans aimed at maintaining water quality. The SEIS should dedicate a focused analysis on sediment releases, particularly their implications for meeting TMDL goals. One critical aspect to highlight is mercury contamination, which poses risks to public health, drinking water supplies, and aquatic ecosystems. A thorough evaluation is crucial to ensure compliance with water quality standards and to guide the development of strategies that mitigate adverse effects.

Conclusion

We commend the Corps for its diligent efforts to analyze the operations and maintenance of this complex system while balancing the varied needs of stakeholders. We anticipate a Final SEIS that carefully considers the impacts of proposed changes and prioritizes the equitable and sustainable management of resources.

Sincerely,

Brent Stevenson

General Manager
Santiam Water Control District

Phone: 503-769-2669 Fax: 503-769-5995
www.santiamwater.gov

Herod, Megan K CIV (USA)

From: Julia Hajduk <jhajduk@staytonoregon.gov>
Sent: Wednesday, June 18, 2025 11:41 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Barry Buchanan; Jennifer Gates
Subject: [Non-DoD Source] Sublimity comments regarding Detroit Dam drawdown
Attachments: Signed Sublimity letter to USACE RE Detroit Dam 6-18-25.pdf

Hello. Please find the attached letter from the City of Sublimity regarding the Detroit Dam drawdown and the SEIS. The original is copy is in the mail today.

Thank you,

Julia

Julia Hajduk
Stayton City Manager

362 N. 3rd Ave
Stayton, OR 97383
Phone 503-769-3425

245 Johnson St.
Sublimity, OR 97385

503-769-5475
Fax 503-769-2206

City of Sublimity

June 17, 2025

By U.S. Mail and E-Mail (willamette.eis@usace.army.mil)

Liz Oliver, Portland District Project Manager
U.S. Army Corps of Engineers

Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946
Portland, OR 97208-2946

Re: Support for Comments Submitted by the City of Stayton Regarding Proposed 2026 Detroit Reservoir Drawdown

Dear Ms. Oliver,

On behalf of the City of Sublimity, I am writing to express our strong support for the comments submitted by the City of Stayton regarding the potential impacts of the proposed 2026 drawdown of the Detroit Reservoir.
While Sublimity operates its own water system, we rely entirely on the City of Stayton for wastewater treatment services. Any disruption to Stayton's ability to operate its drinking water system would also jeopardize its wastewater treatment operations—services upon which our residents and businesses depend every day. This creates a shared vulnerability across our communities.

As outlined in Stayton's letter, even a gradual drawdown of the Detroit Reservoir has the potential to generate sediment levels that could overwhelm Stayton's slow sand filtration system. If Stayton's water treatment process is compromised, the cascading effects would be felt across its entire utility infrastructure, including its capacity to provide wastewater treatment for neighboring communities like Sublimity.

Small cities like ours do not have the resources to independently mitigate these impacts. We urge the Corps to thoroughly evaluate alternatives to a deep drawdown and clearly define how it will mitigate impacts and provide support for communities affected downstream.

Thank you for your consideration of these regional concerns.

Sincerely,

Micheal Taylor, Mayor
City of Sublimity

Herod, Megan K CIV (USA)

From: Jennifer Fairbrother <jennifer@nativefishsociety.org>
Sent: Wednesday, June 18, 2025 10:37 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Doug Heiken
Subject: [Non-DoD Source] CENWP-PME-E / Willamette EIS
Attachments: WVS SEIS Scoping Comments - June 2025.pdf

Dear Col. Caswell, Jr,

Comments for the scoping on the WVS SEIS are attached. Thank you for your consideration.

Sincerely,

JENNIFER FAIRBROTHER
Legislative & Policy Director | Native Fish Society
PO Box 1536, Oregon City, OR 97045
Cell: (541) 602-0696 | Office: (503) 344-4218
nativefishsociety.org • Instagram

Due to my part-time schedule, I check and respond to emails during my regular office hours: Monday-Wednesday mornings and Thursday afternoons. I will do my best to respond within two business days. For urgent matters, please call or text my cell.

NOTICE OF UPCOMING LEAVE: I will be out of the office July 3-August 8 and August 25-September 1.

June 18, 2026

Col. Larry Dale Caswell, Jr.
U.S. Army Corps of Engineers District Commander
P.O. Box 2946
Portland, OR 97208-2946

Sent via email to: Willamette.EIS@usace.army.mil

Attn: CENWP-PME-E / Willamette EIS

Dear Col. Caswell, Jr.,

Native Fish Society and Oregon Wild submit these comments in response to the scoping period for the Willamette Valley System (WVS) Supplemental Environmental Impact Statement (SEIS). As organizations dedicated to reviving self-sustaining native fish species and healthy rivers around the Pacific Northwest, we have a fundamental interest in ensuring the SEIS comprehensively evaluates all feasible alternatives to restore native fish populations in Oregon's Willamette Basin.

The Willamette Valley System dams have contributed significantly to the decline of threatened and endangered salmon and steelhead populations, as well as native resident fish species, including bull trout. The SEIS presents a critical opportunity to evaluate operational and structural modifications that prioritize fish recovery consistent with the Endangered Species Act (ESA) and the Corps' legal obligations.

It also represents an opportunity for the Corps to disclose the full suite of information about what is and isn't possible in operating the system. This information will enable the Corps, federal and state fisheries management agencies, tribal nations and peoples, local communities, lawmakers, and advocates to have substantive conversations about charting a path forward, together, on a plan for the basin that will have a reasonable chance to recover our iconic fish populations while maintaining

the Corps' flood control capabilities, water storage mandates, and recreation opportunities. It's time to put the information out in the public view for consideration and conversation. We implore the Corps to use this opportunity to engage in this work collaboratively and in good faith with the aforementioned entities that seek to build a path forward for our fish, rivers, and communities.

Concerns With The Current SEIS Process

1. Inadequate Timeline for Meaningful Review and Coordination

The SEIS is being developed under an unreasonably compressed timeline that undermines meaningful public participation and inter-agency and tribal coordination. This SEIS is being rushed through an abbreviated process that prevents thorough analysis of complex alternatives and adequate time for meaningful engagement, input, and coordination with stakeholders and cooperating partners. The fact that the Corps has already presented the structure of the new "Alternative 6" and a proposed timeline of cooperating agency and partner review for this summer suggests that the alternative is already baked and that input via this scoping period will receive minimal consideration.

We recommend that the Corps extend the SEIS timeline to allow for comprehensive alternative development and analysis and meaningful stakeholder engagement. Yes; moving forward with measures that can improve fish passage, water quality, and flows in a timely way is vital to stemming the tide of decline for listed species. However, the recently published 2024 Biological Opinion for the WVS and interim Record of Decision provide immediate steps that the Corps can and should be taking while this SEIS is in process. Let's do it once; let's do it right.

2. Proposed Alternative Insufficient, Too Narrowly Tailored

The preliminary "Alternative 6" is insufficient and too narrowly tailored. As a result, it will lack critical information necessary for informed decision-making in the future. The congressional intent and purpose behind provisions in the Water Resources Development Acts of 2020, 2022, and 2024 is to ensure that the Corps analyzes all the possible operational and infrastructural measures that can be reasonably undertaken to provide a high likelihood of success in recovering threatened fish populations while reducing the cost of project operations and infrastructure over time. <u>It is time to put all the options on the table through the SEIS so that federal and state agencies, tribes, Congress, and the public can have an honest discussion about the best path forward for our fish, landscapes, and communities.</u>

From what we have observed via the public information sessions, the Corps is missing the opportunity to help facilitate these conversations and decisions by failing to engage in good faith in building out a comprehensive alternative that looks at a full suite of options that may be practicable if commercial hydropower is eliminated at all or some of the dams.

We suggest that the alternative be structured in multiple parts (e.g. Alternative 6A, Alternative 6B, etc.). This should include a detailed, dam-by-dam analysis that evaluates a suite of operations that are

practical at each dam if commercial hydropower generation is eliminated. Each dam has unique characteristics, purposes, and fish passage and water quality challenges that require individualized consideration and evaluation.

The alternative(s) should prioritize:

1. **Volitional downstream passage** during as much of the year as possible, with particular emphasis on winter through spring periods critical for juvenile salmonid outmigration.

2. **Maximum operational flexibility** that does not require adherence to existing refill rule curves and that can account for changing precipitation patterns and temperature regimes.

3. NEPA Requires Consideration of Alternatives Beyond Current Authorities

Stating that the SEIS cannot consider alternatives that include dam removal or year-round drawdowns because the agency has not been directed to do so by Congress is an incorrect interpretation of the Corps' duty under NEPA and the Congressional intent behind the Water Resources Development Acts of 2020, 2022, and 2024.[1]

Courts have consistently required agencies to analyze reasonable alternatives even when they extend beyond the lead agency's current authority. The purpose of NEPA is to promote informed decision-making, and alternatives analysis must serve this purpose regardless of jurisdictional constraints.[2]

4. ESA Obligations Supersede Other Authorized Purposes

The agency must consider alternatives—like extended drawdowns and year-round drafting of reservoirs—that prioritize ESA-listed fish above other project purposes so long as they do no compromise human health and safety. The Ninth Circuit and U.S. District Court of Oregon have recognized the Corps' discretion to manage dams on the Columbia River for the benefit of threatened fish.[3]

The Flood Control Acts authorizing these federal dams imposed broad goals but did not dictate how the Corps must fulfill those goals, giving the agency considerable discretion in choosing what specific actions to take.[4] Moreover, subsequent to the Flood Control Act of 1950, the Fish and

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[1] "The SEIS will not look at removing the dams, and it will not consider changes that would eliminate other functions of the dam, such as flood risk management, irrigation and recreation." June 11, 2025 on https://www.nwp.usace.army.mil/WVS-EIS/

[2] See: *California v. Block*, 690 F.2d 753, 766 (9th Cir. 1982); *Citizens Against Burlington v. Busey*, 938 F.2d 190, 195-196 (D.C. Cir. 1991); *Muckleshoot Indian Tribe v. U.S. Forest Service*, 177 F.3d 800, 814 (9th Cir. 1999); *Nat'l Wildlife Federation v. Nat'l Marine Fisheries Service*, 353 F.Supp.2d 1143, 1154 (W.D. Wash 2002); *Natural Resources Defense Council v. Morton*, 458 F.2d 827, 836 (D.C.Cir. 1972)

[3] *Northwest Environmental Defense Center, et al. v. United States Army Corps of Engineers, et al.,* Case No. 3:18-cv-00437-HZ; *NWF v. NMFS*, 524 F.3d at 928-29; Nat'l *Wildlife Fed'n v Nat'l Marine Fisheries Serv.*, 2005 WL 1278878, at *9-10 (D. Or. May 26, 2005).

[4] *See NWF v. NMFS*, 524 F.3d at 928-29.

Wildlife Coordination Act and the Northwest Power Act specifically called for fish and wildlife conservation when managing the dams.[5]

Because of the Corps' management discretion, the agency must operate dams in the Willamette System in compliance with the ESA's no-jeopardy mandate, regardless of the expense or burden. Thus, courts have ordered the Corps to conduct operations to benefit fish at the expense of other project purposes like hydropower and recreation.[6]

Other courts have recognized that Flood Control Acts impose broad goals, and the Corps has broad discretion when balancing the multiple uses of dams, requiring compliance with the ESA.[7]

The same reasoning applies here. The Willamette Valley System was authorized by Flood Control Acts—including the one that applied to the Columbia River dams—that impose broad goals and do not mandate specific dam operations.[8] Accordingly, the Corps has the discretion to alter the management of the Willamette dams to benefit ESA-listed species at the expense of other uses—including power production and recreation—just as it does with the Columbia dams. The ESA requires the Corps to exercise that discretion to benefit ESA-listed species, even if that requires prioritizing fish needs above other authorized purposes.

Further, the congressional authorizations do not require that the recreation purpose look a specific way; rather, they require that some activities that qualify as "recreation" should be provided through the operations of the WVS. As such, there is no legal mandate that the Corps constrain operations that could be of benefit to the recovery of ESA-listed species in order to meet specific pool elevations for specific types of recreational activities.

Even if the Corps lacked authority to conduct operations or make improvements or alterations to operations and structures to protect ESA-listed fish, the Corps should seek authorization from Congress to do so.

Specific Elements Suggested For Analysis

1. Extended Drawdowns and Run-of-River Operations

Green Peter, Cougar, Hills Creek, Detroit, and Lookout Point Reservoirs: Analyze year-round and seasonal drawdowns for juvenile fish passage both independently and collectively, involving:

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[5] *Id.* at 929 n. 8

[6] *NWF v. NMFS* , 2017 WL 1829588, at *6, Aff'd, 886 F.3d 803.

[7] These include: *Miccosukee Tribe of Indians of Florida v. U.S. Army Corps of Eng'rs*, 716F.3d 535, 541-45 (11th Cir. 2013); *In re: Operation of the Missouri River System Litigation*, 421 F3d 618, 625 (8th Cir. 2005); *Am. Rivers v. U.S. Corps of Eng'rs*, 271 F.Supp.2d 230, 252-53 (D.D.C. 2003).

[8] *See* supra p. 4; Flood Control Act of 1950, Pub L. No. 81-516, § 204, 64 Stat. 163, 178-79 (1950).

- Permanently or seasonally lowering reservoirs to within 20 feet of their lowest outlet; consider various timings and durations for seasonal drawdowns that coincide with juvenile outmigration that supports the diversity of life history types present

- Storing additional water only when necessary to reduce downstream flood risk and meet obligations under the legislatively adopted provisions in the Willamette Basin Review[9]

- Managing release of flood surcharges to minimize adverse total dissolved gas (TDG) conditions downstream

2. Structural Modifications

Analyze structural improvements including:

- Spillway flip-lips to reduce TDG production

- Modification of regulating outlet outfalls to broaden impact area and reduce plunge depth

- Modification of power infrastructure for either full removal or modification to assist in operations to address water quality and fish passage needs when necessary

- Other engineering solutions to improve fish passage efficiency and survival rates

2. Reregulation Dam Operations, Potential Removal

Big Cliff and Dexter Dams: These hydropower reregulation dams do not serve any flood control purposes. As such, the Corps must produce and evaluate alternatives that include consideration of modifying or removing these dams to support the recovery of listed salmonids, including:

- Operate re-regulating dam(s) as run-of-the-river without commercial hydropower operations
- Total removal of re-regulation dam(s)
    - Include economic analysis of the costs versus benefits of continued operation of these structures without commercial hydropower versus dam removal
- Re-evaluate operational and structural fish passage measures at Detroit and Lookout Point dams under the above scenarios (e.g. evaluate overall passage efficiency and survival changes for species migrating through Detroit Dam only vs. Big Cliff and Detroit dams under various operational scenarios)

3. Enhanced Passage Measures

Hills Creek Dam: Analyze more robust passage measures, potentially similar to those implemented or planned at Cougar Dam, with particular attention to support for bull trout movement and habitat connectivity

[9] Water Resources Development Act of 2020, Pub. L. No. 116-260, § 402(d) (2020).

4. Flexible Reservoir and Flow Management

The SEIS should analyze operational flexibility that does not mandate adherence to static rule curves, including consideration of:

- Summer flow augmentation as a lower priority than spring flows critical for fish migration
- Managing reservoir refills to reduce total dissolved gas (TDG) exceedances by reducing the potential for adverse spill operations during spring outmigration periods
- Potential alternatives that can utilize non-commercial hydropower generation when necessary to reduce TDG exceedances when other operational measures are not possible or insufficient

5. Climate Change Integration

We found that the analysis in the original EIS lacked substantive consideration of how climate change will impact the effectiveness of the various alternatives. We recommend incorporating a more thorough analysis in the SEIS.

CONCLUSION

Management of the Willamette Valley System is a critical opportunity to demonstrate that federal dam operations can prioritize ecosystem restoration and native fish recovery while maintaining essential flood control functions and providing other services, including recreation and water storage. A substantive no-commercial hydropower alternative should represent a science-based approach that acknowledges the reality of climate change and the urgent need for native fish recovery.

We urge the Corps to give this alternative serious consideration and robust analysis in the SEIS. The future of iconic Pacific Northwest salmon and steelhead runs may well depend on it.

Sincerely,

Jennifer Fairbrother
Native Fish Society

Doug Heiken
Oregon Wild

Herod, Megan K CIV (USA)

From: Julia Hajduk <jhajduk@staytonoregon.gov>
Sent: Tuesday, June 17, 2025 2:03 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Barry Buchanan; Brian Quigley; Stephen Sims; Jennifer Gates
Subject: [Non-DoD Source] City of Stayton comments on Detroit Dam Drawdown SEIS
Attachments: Signed letter to USACE RE Detroit Dam 6-17-25.pdf

Ms. Oliver – Please find the attached letter from the City of Stayton with our comments on the Proposed Detroit Dam Drawdown and the SEIS. Please confirm receipt of this letter and email.

Thank you,

Julia

Julia Hajduk
Stayton City Manager

362 N. 3rd Ave
Stayton, OR 97383
Phone 503-769-3425

City of Stayton

Administration • Finance
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June 17, 2025

By U.S. Mail and E-Mail (willamette.eis@usace.army.mil)

Liz Oliver, Portland District Project Manager

United States Army Corps of Engineers

Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946
Portland, OR 97208-2946

Re: Comments on Proposed 2026 Detroit Reservoir Drawdown

Dear Ms. Oliver,

This letter provides the comments by the City of Stayton ("Stayton"), Oregon for consideration of the United States Army Corps of Engineers' (the Corps) in the Corps' preparation of the Supplemental Environmental Impact Statement with respect to future drawdowns of the Detroit Dam reservoir. Stayton is extremely concerned about the prospect of any drawdown that releases sediments into the North Santiam River. Sediments will cause the City's drinking water treatment plant to fail, leaving the City's residents, emergency services, wastewater treatment system, among other critical water users, without water. The Corps must understand that a deep drawdown, and indeed any drawdown that releases a significant amount of sediment, will have catastrophic consequences for the City, its infrastructure and its 8,200 residents.

Stayton is located 35 miles downstream from the Detroit Dam.[1] Stayton is a vibrant small city of about 8,200 people nestled in Marion County, Oregon, where generations of families, young professionals, and retirees share a strong sense of community. Stayton's median household income is $72,557, below both the state and national numbers. While household income is lower, Stayton's average household size is larger than the state and national average at about 2.65 persons per household and roughly a family size of 3.15. Stayton residents are proud, hardworking people who build life through effort, not necessarily ease.

Stayton obtains its drinking water from the North Santiam River. The City's water intake is located on a Santiam Water Control District canal that is fed exclusively from the river. From the intake, pipes carry the river water by gravity directly to the City's drinking water treatment plant. The plant comprises three slow sand filters (SSFs), pH correction, and disinfection to render the river water potable. The SSFs are constructed of lower support gravels and underdrains, a lower buffer sand layer (18-inches deep), and an upper working sand layer (also 18-inches deep) topped by the dirt built

[1] This distance is equal to or shorter than the distance of several of the cities from the Green Peter reservoir (e.g. Albany, Lebanon) that experienced adverse effects during the 2023 drawdown from the Green Peter dam.

up layer called the schmutzdecke, which is biologically active, retaining the silt, clay, and organic contaminants from the river water.

Typical turbidity of the Santiam River water taken in by Stayton is 3-7 NTUs. The City's SSFs can handle turbidity levels of less than 10 NTUs. This turbidity limit is not unique to the City's SSFs. In fact, the United States Environmental Protection Agency ("EPA") (in collaboration with the Oregon Health Authority) recommends that SSFs be operated at less than 10 NTU and with no colloidal clays. *See* U.S. EPA Area-Wide Optimization Program (AWOP) "Water Quality Goals and Operational Criteria for Optimization of Slow Sand Filtration" at p. 16 (2024). Ten NTUs is the upper limit even for design of new SSF facilities. *Id.*

The effect of prolonged increased turbidity in water intake is not merely slowing purification. Rather, all purification, and indeed as the dirt layer builds, filtered water production declines until potentially all flow of water through the filters ceases, because the schmutzdecke becomes clogged with sediment.

Under normal operations, either on a time or production basis, for maintenance the SSF is taken out of service, drained of water, and the surface is mechanically scraped to remove the schmutzdecke. Once cleaned, the filter goes into a ripening phase where water is passed through the filter to waste[2] as growth of the schmutzdecke is initiated and the filtering process returns to an acceptable level of discharge turbidity at which time the filter is returned to service. The skimmed layer of schmutzdecke and sand is between one quarter inch to one half an inch thick.[3]

EPA's "no colloidal clays" warning for SSFs is particularly concerning with respect to a Detroit Dam drawdown. Clays are extremely fine particles and are often found in the sediment behind dams. Because fine clays are so small, they may penetrate deep into the sand layers of SSFs. This is particularly true when the schmutzdecke is not fully formed, as in immediately following a filter cleaning, potentially contaminating and blocking the working filter layer or worse, passing through the filter sand and migrating into the water distribution system. Penetration of the clays into the deeper filter layers will result in a complete shutdown of the filter and require replacement of the sand media. Even were the City to stockpile fresh sand, the process to remove and replace it, and regenerate the schmutzdecke layer, will take days (or longer) for each SSF.

Depending on the depth of the contamination various repairs may be necessary. Just a schmutzdecke removal physically takes 1-2 days at a cost about $5-10,000 per filter. A replacement of the working sand layer takes several weeks at a cost of about $1-2 million per filter, a rebuilding of the filter may take several months at a cost of about $4-7 million per filter. A total filter rebuild, which is necessary if the sediments penetrate to the lower sand layer and underdrain of the SSF, will cost $10-15 million.

Equally problematic is that the drawdown is not a short event but is planned to occur over months. The costs of responding to clogged SSFs is significant. Crucially, however, replacement after clogging is not a viable option given that the turbidity likely will continue for weeks or months, completely preventing operation of the City's system as replaced media will shortly become clogged, requiring continual replacement. In addition to the material costs, the near-constant additional staff time would be significant as well.

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[2] "Filter to waste" is a technical term referring to a plant releasing water back to its origin, rather than as purified drinking water, because the schmutzdecke is not yet mature enough to fully purify the water.

[3] Note the City's SSF system is different from conventional and membrane filtration systems. (The filtration systems damaged during the 2023 Green Peter drawdown were membrane and ceramic filters). Those systems, while suffering significant infrastructure impacts and slowing operations, could continue to purify water due to their rapid backwash/cleaning capabilities. SSF's are not back washable, and cleaning a SSF is a prolonged physical activity which, depending on raw water condition take days to months.

The City uses 1.5 million gallons of water per day in the winter, so there is no simple alternative for supplying water in the event the SSFs become clogged. The City is investigating alternative water sources, pre-filtration water treatment systems, and complete alternative treatment processes. Based on initial investigation, the cost of any alternative processes may exceed one-third of the City's annual budget.[4] This is not sustainable, and it is not reasonable to ask the residents of Stayton to bear this burden.

Finally, the impacts are not limited only to drinking water, as the Stayton Fire District relies on the availability of water from the plant to fight fires, and the City's sewage system likewise relies on water. Not only do the residents of Stayton rely on drinking water from the plant, but the wastewater discharges from residential, commercial and industrial water users are used for flushing the City's wastewater lines, which provide wastewater service not just for the residents of Stayton but also City of Sublimity (3,000 residents).

The Corps has referenced the potential for a staggered 2026 drawdown to mitigate some of the expected impacts based on those seen during the Green Peter Dam drawdown in 2023. Even a significantly slower and/or more incremental drawdown has the potential to destroy the City's ability to provide clean water to its residents. Given that, during the Green Peter Dam drawdown, the City of Lebanon experienced 300-500 NTUs for several months, and spikes even higher (700 NTUs), a significant drawdown of the Detroit reservoir, even at a gradual pace, is highly likely to exceed the 10 NTU capacity of the City of Stayton's treatment plant.

If the Corps nevertheless moves forward with an incremental but still deep drawdown, the Corps must determine:

- Where and how frequently turbidity will be measured, and ensure quick and representative results are provided to all stakeholders,
- Stayton obtains its drinking water from the North Santiam River. The City's water intake is located on a Santiam Water District canal that is fed exclusively from the river. From the intake, pipes carry the river water directly to the City's drinking water treatment plant. The plant relies on three slow sand filters (SSFs) to purify the river water. The SSFs are comprised of lower sand layers and How the Corps will ensure immediate communication of turbidity readings,
- What process will be in place to ensure that the City and residents of Stayton maintain access to clean water, and
- How and when compensation will be available for costs incurred by the City in preparation for, during and following the drawdown.

When the true costs of a deep drawdown are considered, the cost of building fish collection devices, and/or dredging the reservoir sediment before a drawdown occurs, become reasonable alternatives. The Corps must consider these options in the SEIS. The Corps also should evaluate the likelihood that the flow of water becomes river-like and dislodges even more, or further-afield sediment, and how that situation could be mitigated if not fully addressed by pre-drawdown dredging. Finally, the Corps must consider whether a deep drawdown would accomplish the originally intended goals. The February 2024 Willamette Basin Fifth Bi-Annual Status Report suggests that the Corp had not yet been able to draw conclusions about the efficacy and significant side effects of the Green Peter drawdown. The data and analysis supporting such conclusions must be robust if it will be used as the basis for an action (drawdown at Detroit) that has such significant consequences for Stayton and other cities in the watershed.

A deep drawdown of the Detroit Lake reservoir imposes severe costs on Stayton and its residents, as well as surrounding municipalities, by threatening their access to a reliable water supply for drinking, sanitation, and fire protection. The

[4] Even if Stayton could identify a drinking water alternative, shutting down the treatment plant for even part of the duration of the drawdown would cause significant damage to the plant. For example, as a biologically active filter layer, the schmutzdecke would perish and some or all of the filter material would require replacement and regeneration.

Corps must consider these real risks to public health and safety. Cities like Stayton do not have the resources to implement costly emergency measures, including alternative water sourcing and treatment. The Corps' SEIS must identify how these concerns will be mitigated. Stayton is committed to sustaining the daily life and community well-being that leads people to choose to live here, and looks forward to further dialogue with the Corps.

Sincerely,

Brian Quigley
Mayor

Steve Sims
Council President

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Herod, Megan K CIV (USA)

From: Alvin M. Klausen <AKlausen@co.marion.or.us>
Sent: Monday, June 16, 2025 8:56 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Marion County Public Comment on Ending Hydropower Production and Deeper Detroit Reservoir Drawdowns
Attachments: Hydropower Generation and Detroit Drawdowns - Marion County Public Comment.pdf

Good afternoon,

Please accept this public comment on ending hydropower production and deeper Detroit reservoir drawdowns from the Marion County Board of Commissioners.

Please let me know if you have any follow up questions or comments. Thank you.

Alvin Klausen
Government Relations
Marion County Board of Commissioners
Email: Aklausen@co.marion.or.us
Cell: 503-302-8440

County Commissioners
Danielle Bethell, Chair
Colm Willis
Kevin Cameron

Chief Administrative Officer
Jan Fritz

MARION COUNTY BOARD OF COMMISSIONERS

May 30, 2025

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946
Portland, OR 97208-2946
willamette.eis@usace.army.mil

RE: **Public Comment – Supplemental Environmental Impact Statement on Detroit Reservoir Drawdown and Willamette Valley Hydropower Termination**

Dear U.S. Army Corps of Engineers:

The Marion County Board of Commissioners submit the following public comment to express deep concern and strong opposition to two proposals under review in the current Supplemental Environmental Impact Statement (SEIS) process: (1) the proposed deeper fall drawdown of Detroit Reservoir, and (2) the consideration of permanently ending hydropower production at dams in the Willamette Valley System.

Threat to Drinking Water for Hundreds of Thousands

Detroit Reservoir, impounded by Detroit and Big Cliff Dams on the North Santiam River, is a linchpin in the water supply infrastructure for over 200,000 Oregonians. Communities including Salem, Stayton, and Turner depend on the North Santiam as their primary drinking water source. A deeper fall drawdown risks:

- **Severe turbidity and sediment discharges**, overwhelming treatment systems and increasing the likelihood of boil-water advisories or treatment shutdowns;
- **Escalating treatment costs**, which will be passed on to residents and local governments;
- **Increased public health risks**, especially for vulnerable populations, should water treatment systems fail or become unstable;
- **Infrastructure strain and service reliability threats**, as our systems are not designed to manage the sediment volumes expected from deeper drawdowns.

Given the magnitude of these impacts, we strongly urge the Corps to include a full Environmental Impact Statement (EIS) that evaluates drinking water reliability, water quality degradation, public health, and downstream infrastructure vulnerability before any drawdown action is undertaken.

Economic and Environmental Impacts in the Santiam Canyon

The Santiam Canyon, including the communities of Detroit and Idanha, remains in a fragile state after the devastating 2020 wildfires. These towns rely heavily on the recreational economy generated by Detroit Lake. The proposed drawdown would:

- Destroy the kokanee salmon fishery, a major tourism draw and cultural staple;
- Render marinas and boat ramps inoperable for months, crippling seasonal businesses;
- Undermine ongoing recovery efforts and investments by local, state, and federal entities;
- Erase economic opportunities for a region already struggling to rebuild.

It is imperative that any drawdown proposal be accompanied by a comprehensive socioeconomic impact assessment to measure and mitigate the cumulative burden being placed on this already distressed region.

Preserving Hydropower: A Cornerstone of Green, Affordable Energy

The proposal to eliminate hydropower generation at Detroit and other Willamette Valley dams is equally alarming. Hydropower is one of the most cost-effective and sustainable energy sources available to our state. Detroit and Big Cliff Dams alone generate enough electricity to power every household in Oregon. Hydropower offers key advantages:

- Clean, renewable, and carbon-free, essential to Oregon's climate and energy goals;
- Low-cost generation, reducing energy bills for Oregon families;
- Flexible backup power, critical to grid reliability during outages or extreme weather events;
- Long lifespan and low maintenance costs, delivering enduring return on investment.

Removing hydropower capacity from the Willamette Valley System would increase regional dependence on fossil fuels or more expensive alternatives, undermine grid stability, and contradict both federal and state climate policy objectives.

Moreover, Congress explicitly authorized hydropower as a purpose of these dams. Any changes to their use must weigh the long-term economic, environmental, and national security implications of reducing renewable generation.

Our Recommendations

In light of these serious concerns, the Marion County Board of Commissioners requests the following actions:

1. A complete Environmental Impact Statement for both proposals that includes drinking water analysis, economic impact modeling, and alternative options to meet fish passage requirements;

2. A halt to any implementation of deeper drawdowns or changes to hydropower operations until the EIS process is complete and reviewed in consultation with local governments;

County Commissioners
Danielle Bethell, Chair
Colm Willis
Kevin Cameron

Chief Administrative Officer
Jan Fritz

3. Collaborative stakeholder engagement with affected municipalities, water providers, utilities, and communities before decisions are made;

4. Mitigation and funding commitments from USACE to address damage to water infrastructure, economic losses, and public health risks if either proposal proceeds.

The future of our water systems, energy grid, and rural communities should not be sacrificed without full transparency, rigorous analysis, and local input. Marion County stands ready to partner in developing balanced solutions that protect fish and rivers without devastating the people who depend on them.

Thank you for considering our input.

Sincerely,

Danielle Bethell	Colm Willis	Kevin Cameron
Chair	Commissioner	Commissioner

555 Court Street NE, Suite 5232 ▪ P.O. Box 14500 ▪ Salem, OR 97309-5036 ▪ www.co.marion.or.us
Phone: (503) 588-5212 FAX: (503) 588-5237

Herod, Megan K CIV (USA)

From: REIS Kelly E * ODFW <Kelly.E.REIS@odfw.oregon.gov>
Sent: Wednesday, June 11, 2025 10:15 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: STAHL Tom * ODFW; REIS Kelly E * ODFW; Oliver, E A (Liz) CIV (USA); Nirvana.Z.COOK@water.oregon.gov; robison@willamettepartnership.org; Chris Allen; LOBOY Zach * DEQ; Taylor, Gregory A CIV USARMY CENWP (USA); Dorsey, Garrett L CIV USARMY CENWP (USA); Hamilton, Jess CIV USARMY CENWP (USA); Warner, Kathryn L CIV USARMY CENWP (USA); Lyon, Amanda A CIV USARMY CENWP (USA); christian.nauer@ctwsbnr.org; Vallette.Yvonne@epa.gov; morgan.bond@noaa.gov; Cope.Ben@epa.gov; Wakeland, Torey - CTGR; ceder@usbr.gov; briggs.nicole@epa.gov; WIGAL Jennifer * DEQ; Janes, Kelly A CIV USARMY CENWP (USA); jeff.jorgensen@noaa.gov; Clark, Steven J CIV USARMY CEMVP (USA); glbrown@bpa.gov; CLEMENTS Shaun * ODFW; STAHL Tom * ODFW; TCRobertK@ctsi.nsn.us; MRAZIK Steve * DEQ; stbiegel@bpa.gov; sfrollins@bpa.gov; Schlief.Scott@epa.gov; samuel.bankston@noaa.gov; COUTURE Ryan B * ODFW; TUGAW Heather * DEQ; stanvandewetering@yahoo.com; Palmer.John@epa.gov; rich.zabel@noaa.gov; Bardy, April K CIV USARMY CENWP (USA); MCCORD Mike L * WRD; michael_hudson@fws.gov; Bobby Bruno; rjdiffely@bpa.gov; Karnosh, Michael - CTGR; melissa.jundt@noaa.gov; Maier.Michelle@epa.gov; HIBBS Rob * ODA; MCCORD Mike L * WRD; lbchase@bpa.gov; kelly.dirksen@grandronde.org; josie.thompson@noaa.gov; jgbarton@bpa.gov; WIGAL Jennifer * DEQ; Mbabaliye.Theogene@epa.gov; Marganne.ALLEN@oda.oregon.gov; ZILLER Jeffrey S * ODFW; Schwabe, Lawrence - CTGR; kkoleini@usbr.gov; keri.handaly@grandronde.org; Briece.Edwards@grandronde.org; jcallens@oda.state.or.us; kathleen.wells@noaa.gov; jpkarnezis@bpa.gov; STAPLETON Isaak * ODA; kentankyla@outlook.com; Jeff Maslow; jhkintz@bpa.gov; gsashby@bpa.gov; GOLDRICH-MIDDAUGH Grace * DEQ; alheredia@bpa.gov; KELLEY Elise X * ODFW; ejandersen@bpa.gov; jim.myers@noaa.gov; WOODCOCK Douglas E * WRD; aemai@bpa.gov; aljohnson@bpa.gov; bitalac.emily@epa.gov; brad.houslet@ctwsbnr.org; anne.mullan@noaa.gov; MUCKEN Alyssa M * WRD; djspear@bpa.gov; asnagra@bpa.gov; Griffith, David W CIV USARMY CENWP (USA); bgoscar@bpa.gov; Piaskowski, Richard M CIV USARMY CENWP (USA); Herod, Megan K CIV (USA)
Subject: [Non-DoD Source] ODFW preliminary comments on Willamette Valley System SEIS scope
Attachments: WVS SEIS Scoping ODFW Comments_2025.06.11.pdf

Please find attached Oregon Department of Fish and Wildlife's preliminary comments and questions on the WVS SEIS scope.

Thank-you for the opportunity to participate as a Cooperating Agency and to provide comments.

Let me know if you have questions.

Kelly

Kelly Reis (she/her)

Willamette Fish and Wildlife Policy and Program Manager
Oregon Department of Fish & Wildlife
C: 541-517-2228
kelly.e.reis@odfw.oregon.gov

From: REIS Kelly E * ODFW <Kelly.E.Reis@odfw.oregon.gov>
Sent: Friday, May 23, 2025 5:15 PM
To: Herod, Megan K CIV (USA) <Megan.K.Herod@usace.army.mil>; Piaskowski, Richard M CIV USARMY CENWP (USA) <Richard.M.Piaskowski@usace.army.mil>; Oliver, E A (Liz) CIV (USA) <Liz.Oliver@usace.army.mil>; Griffith, David W CIV USARMY CENWP (USA) <David.W.Griffith@usace.army.mil>; Warner, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Warner@usace.army.mil>; Hamilton, Jess CIV USARMY CENWP (USA) <Jessica.T.Hamilton@usace.army.mil>; Lyon, Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>; Dorsey, Garrett L CIV USARMY CENWP (USA) <Garrett.L.Dorsey@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Bardy, April K CIV USARMY CENWP (USA) <April.K.Bardy@usace.army.mil>; Janes, Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Clark, Steven J CIV USARMY CEMVP (USA) <Steven.J.Clark@usace.army.mil>; aemai@bpa.gov; alheredia@bpa.gov; aljohnson@bpa.gov; MUCKEN Alyssa M * WRD <Alyssa.M.MUCKEN@water.oregon.gov>; anne.mullan@noaa.gov; asnagra@bpa.gov; bgoscar@bpa.gov; bitalac.emily@epa.gov; brad.houslet@ctwsbnr.org; Briece.Edwards@grandronde.org; briggs.nicole@epa.gov; ceder@usbr.gov; Chris Allen <chris_allen@fws.gov>; christian.nauer@ctwsbnr.org; Cope.Ben@epa.gov; djspear@bpa.gov; WOODCOCK Douglas E * WRD <Douglas.E.WOODCOCK@water.oregon.gov>; ejandersen@bpa.gov; KELLEY Elise X * ODFW <Elise.X.KELLEY@odfw.oregon.gov>; glbrown@bpa.gov; GOLDRICH-MIDDAUGH Grace * DEQ <Grace.Goldrich-Middaugh@deq.oregon.gov>; gsashby@bpa.gov; TUGAW Heather * DEQ <Heather.TUGAW@deq.oregon.gov>; STAPLETON Isaak * ODA <Isaak.STAPLETON@oda.oregon.gov>; jcallens@oda.state.or.us; jeff.jorgensen@noaa.gov; ZILLER Jeffrey S * ODFW <Jeffrey.S.ZILLER@odfw.oregon.gov>; WIGAL Jennifer * DEQ <Jennifer.WIGAL@deq.oregon.gov>; jgbarton@bpa.gov; jhkintz@bpa.gov; jim.myers@noaa.gov; Jeff Maslow <jjmaslow@bpa.gov>; josie.thompson@noaa.gov; jpkarnezis@bpa.gov; kathleen.wells@noaa.gov; kelly.dirksen@grandronde.org; kentankyla@outlook.com; keri.handaly@grandronde.org; kkoleini@usbr.gov; Schwabe, Lawrence - CTGR <Lawrence.Schwabe@grandronde.org>; lbchase@bpa.gov; Maier.Michelle@epa.gov; Marganne.ALLEN@oda.oregon.gov; Mbabaliye.Theogene@epa.gov; melissa.jundt@noaa.gov; Karnosh, Michael - CTGR <Michael.Karnosh@grandronde.org>; michael_hudson@fws.gov; MCCORD Mike L * WRD <Mike.L.MCCORD@water.oregon.gov>; MCCORD Mike L * WRD <Mike.L.MCCORD@water.oregon.gov>; morgan.bond@noaa.gov; Nirvana.Z.COOK@water.oregon.gov; Palmer.John@epa.gov; rich.zabel@noaa.gov; rjdiffely@bpa.gov; HIBBS Rob * ODA <Rob.HIBBS@oda.oregon.gov>; Bobby Bruno <robert.brunoe@ctwsbnr.org>; robison@willamettepartnership.org; COUTURE Ryan B * ODFW <Ryan.B.COUTURE@odfw.oregon.gov>; samuel.bankston@noaa.gov; Schlief.Scott@epa.gov; sfrollins@bpa.gov; CLEMENTS Shaun * ODFW <Shaun.CLEMENTS@odfw.oregon.gov>; stanvandewetering@yahoo.com; stbiegel@bpa.gov; MRAZIK Steve * DEQ <Steve.MRAZIK@deq.oregon.gov>; TCRobertK@ctsi.nsn.us; STAHL Tom * ODFW <Tom.Stahl@odfw.oregon.gov>; Wakeland, Torey - CTGR <Torey.Wakeland@grandronde.org>; Vallette.Yvonne@epa.gov; WIGAL Jennifer * DEQ <Jennifer.WIGAL@deq.oregon.gov>; LOBOY Zach * DEQ <Zach.LOBOY@deq.oregon.gov>
Cc: REIS Kelly E * ODFW <Kelly.E.REIS@odfw.oregon.gov>; STAHL Tom * ODFW <Tom.Stahl@odfw.oregon.gov>
Subject: RE: Cooperating Agency Meeting - WVS SEIS

Liz –

Please find attached Oregon Department of Fish and Wildlife's request for an extension to the deadline for SEIS scoping comments. The extension will allow further discussions between the USACE and the Cooperating Agencies on the proposed actions.

Thank-you for your consideration.

Kelly

Kelly Reis (she/her)

Willamette Fish and Wildlife Policy and Program Manager

Oregon Department of Fish & Wildlife
C: 541-517-2228
kelly.e.reis@odfw.oregon.gov

Oregon
Tina Kotek, Governor

Department of Fish and Wildlife
Fish Division
4034 Fairview Industrial Drive SE
Salem, OR 97302-1142
(503) 947-6201
FAX (503) 947-6330
odfw.com

Submitted electronically to: Willamette.EIS@usace.army.mil

June 11, 2025

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946 Portland, OR 97208-2946

Re: Oregon Department of Fish and Wildlife Comments on Willamette Valley System Supplemental Environmental Impact Statement Scoping

Thank you for the opportunity to provide comments as the U.S. Army Corps of Engineers (USACE) considers the scope of the supplemental Environmental Impact Statement (SEIS) for the operation and maintenance of the Willamette Valley System. The USACE presented a high-level overview of the SEIS to Cooperating Agencies (CAs) on May 19, 2025. As noted in an email dated May 23, 2025, the Oregon Department of Fish and Wildlife (ODFW), in coordination with other CAs requested an extension of time to further explore questions and issues around the deauthorization of hydropower with the USACE and CAs before providing comments. On June 4th, the USACE announced that it will conduct two meetings with CAs in June to discuss the Water Resources Development Act (WRDA) and hydropower in the WVS, and to provide an overview of scoping comments received to date. On June 5th, USACE announced an extension of the comment deadline from June 6th to June 21st.

As a CA, ODFW anticipated additional opportunities to discuss and inform the SEIS scope prior to public review, more like the CA input and review process previously conducted for the EIS. Despite the overlapping public and CA review processes, ODFW appreciates the comment deadline extension to allow additional time for CAs and USACE to discuss the new alternative. ODFW provides the following SEIS scope comments, questions and considerations ahead of the newly extended deadline with the intention of providing additional context as USACE develops its June CA meeting materials. ODFW may provide additional comments and/or questions following the CA meetings.

General Comments

- Lack of access to habitat via safe and effective passage at Willamette Valley Project dams is a key limiting factor for salmon and steelhead recovery in the Willamette basin (ODFW & NMFS, 2011)[1]. Safe and effective upstream and volitional downstream fish passage is critical for salmon and steelhead, Pacific lamprey, bull trout and other native migratory fish populations in the Willamette basin.

[1] ODFW (Oregon Department of Fish and Wildlife) and NMFS (National Marine Fisheries Service). 2011. Upper Willamette River Conservation and Recovery Plan for Chinook Salmon and Steelhead. August 5, 2011. West Coast Region, NMFS.

- USACE has provided very little information about what specifically is being proposed under this SEIS to date. We request access to the USACE report provided to Congress following the 2022 WRDA disposition study on hydropower in the Willamette Valley, and any other information and documents the USACE used to inform the SEIS.
- We request that USACE planned CA workshops: a) consider CA feedback to develop deauthorization scenarios in the WVS; b) discuss the trade-offs of different deauthorization scenarios; and c) discuss various scenarios and considerations for how to safely conduct the Detroit drawdown to provide benefits to ESA-listed fish while minimizing impacts, including to drinking water quality, water supply, fishing and other recreational opportunities, and local economies.
- We request USACE seek Congressional approval to modify the rule curve to provide flexibility for how to operate the reservoirs with or without power requirements to improve downstream fish passage while minimizing impacts to non-fish passage priorities, including water quality and water supply. The rule curves were developed decades ago and are less relevant for reservoir management under present and anticipated climatic conditions.
    - Rule curve modifications should provide added flexibility for Forecast-Informed Reservoir Operations (FIRO).
    - Absent the need to always maintain the power pool, there may be added flexibility for water management.
- Please provide results of reservoir elevation modelling and analyses related to downstream flow conditions in adequate, dry (deficit), and wet (abundant) water years under different potential reservoir management scenarios that highlight the various trade-offs for water management with or without power requirements at various reservoirs. As part of these analyses, please include how frequently USACE expects to experience the different water year conditions over the lifetime of the EIS.

<u>Deauthorization Comments and Questions</u>

- Please provide a dam-by-dam analysis with information about costs and benefits of deauthorization (fish passage, water quality, water supply, flow management flexibility, short-term and long-term project economic costs, etc.). This is consistent with 2022 WRDA (Section 8220) which requested "… a disposition study to determine the Federal interest in, and identify the effects of, deauthorizing hydropower as an authorized purpose, *in whole or in part* [emphasis added], of the Willamette Valley hydropower project."
- Ultimately, ODFW would like USACE to have flexibility for how the dams are managed to provide safe and effective volitional passage and other benefits for fish. It is possible that the best solution for fish may not exclude the ability to generate power at a given dam during parts of the day or year when fish are less likely to be passing through the turbines (e.g., Cougar Dam interim operations, Foster Dam day/night operations).
- Newly considered opportunities to provide fish passage and other benefits for fish should be combined with information provided in the Final EIS to inform a revised Preferred Alternative.
- The following questions should also be considered and addressed:
    - How will the USACE provide attraction flow to the penstock or other outlets for downstream fish passage?
    - How might the ability to provide attraction flow to Adult Fish Facilities change under "no power" alternatives?
    - How might the ability to dissipate energy and reduce Total Dissolved Gases change under "no power" alternatives?

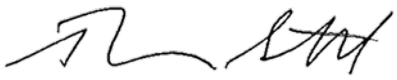
- How will the USACE meet the stored water demands identified in the Willamette Basin Review under a "no power" alternative or the Preferred Alternative?
- If a decision is made to deauthorize power at some or all dams, how long would it take to implement at each facility once funded, and how will the USACE meet fish passage and downstream water needs during the interim and implementation phases?
- How will re-regulation ("re-reg") dams and reservoirs be managed to benefit fish if upstream dams are not used to generate power? What is the purpose of re-reg reservoirs if power is not being generated?

Detroit Reservoir Deep Drawdown Comment

- Please provide additional analyses or information that consider drawdown options that will reduce impacts to the Detroit Reservoir kokanee fishery while maintaining benefits to listed fish.

Thank you for your consideration. Please contact Kelly Reis (kelly.e.reis@odfw.oregon.gov) with questions regarding these comments. We look forward to working with USACE and the CAs in this process.

Sincerely,



Tom Stahl
Deputy Administrator for Inland Fish

cc: WVS EIS Cooperating Agencies

Herod, Megan K CIV (USA)

From: Ella Krohn - NOAA Affiliate <ella.krohn@noaa.gov>
Sent: Tuesday, June 10, 2025 12:07 PM
To: CENWP-PME-Williamette-Valley-System-EIS; Gibbons, Amy C CIV USARMY CENWP (USA)
Cc: Tackley, Kathryn L CIV USARMY CENWP (USA); Taylor, Gregory A CIV USARMY CENWP (USA); Wells, Elizabeth R CIV USARMY CENWP (USA); Oliver, E A (Liz) CIV (USA); Griffith, David W CIV USARMY CENWP (USA); Dorsey, Garrett L CIV USARMY CENWP (USA); Piaskowski, Richard M CIV USARMY CENWP (USA); michael_hudson@fws.gov; brian_bangs@fws.gov; jhkintz@bpa.gov; Lawrence.Schwabe@grandronde.org; Kelly.E.REIS@odfw.oregon.gov; Shaun.Clements@odfw.oregon.gov
Subject: [Non-DoD Source] Willamette Valley System Supplemental Environmental Impact Statement
Attachments: Willamette Valley System_SEIS_20250610.pdf

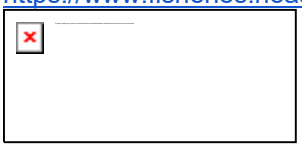
Hello,

Please find the Willamette Valley System Supplemental Environmental Impact Statement attached. This electronic copy is for your records and files.

Please direct questions to Anne Mullen.

Thank you

--
Ella Krohn
Administrative Assistant | Contractor
NOAA Fisheries | WCR | U.S. Department of Commerce
Office: 253-235-3096
https://www.fisheries.noaa.gov/region/west-coast



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
1201 NE Lloyd Boulevard, Suite 1100
PORTLAND, OR 97232-1274

June 10, 2025

Amy Gibbons
Branch Chief, Environmental Planning
U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946 Portland, OR 97208-2946

Submitted electronically to: Willamette.EIS@usace.army.mil

Dear Ms. Gibbons:

This letter responds to the U.S. Army Corps of Engineers, Portland District's (USACE's) request for cooperating agency participation in the scoping process for the proposed Willamette Valley System (WVS) Supplemental EIS (SEIS), which follows the April 2025 Record of Decision for WVS Operations and Maintenance activities. The SEIS is in preparation as was described in the USACE May 16, 2025, Notice of Intent and on the SEIS web page. Both noted a comment period end date of June 6, 2025, which allowed a very short response time. On June 5, 2025, USACE extended the comment period to June 21, 2025.

As stated in the Notice of Intent:

> The [April 2025] Record of Decision … was narrow, including only the necessary interim actions, while the longer-term actions could be compared with an alternative that would cease hydropower operations as directed by section 1326 of the WRDA 2024. . . The USACE received the National Marine Fisheries Service's (NMFS's) Biological Opinion for the continued operations and maintenance of the WVS under section 7 of the ESA in December 2024. The SEIS will also include actions included in the 2024 NMFS Biological Opinion that were not previously analyzed. . . The USACE anticipates making the draft SEIS available for public comment in Fall of 2025.

Since then, USACE has held one scoping meeting for the cooperating agencies and several public scoping meetings. These comments are an early attempt to request consideration of actions not included in the currently described Alternative 6, which provides only one set of hydropower deauthorizations (i.e., ending hydropower at all applicable WVS dams) and a single action from the NMFS 2024 Biological Opinion Reasonable and Prudent Alternative (RPA) (i.e., deep drawdown of Detroit Reservoir for downstream passage of Upper Willamette River Chinook salmon and steelhead). We appreciate USACE's timely efforts to prepare an implementation plan for this RPA (4.12.2).

Other elements in the 2024 RPA that should be considered under this SEIS include:

1. RPA 4.13.2 requested Cougar Dam operations of the existing diversion tunnel to provide year-round passage when flood risk management allows, after drawing down the reservoir to elevations near or below the top of the tunnel (1,300 feet).
2. For reservoir operations that affect fish passage, RPAs 4.11 and 4.12 request that USACE design operations with forecast informed reservoir operations (FIRO) to improve Green Peter Reservoir refill timing, and coordinate the implementation of FIRO to improve Detroit Reservoir refill capabilities. In both cases, this will allow better spring spill

timing for juvenile passage and may also improve temperature management by extending the spill period to release warmer flows as needed to meet downstream temperature targets. Efforts for modifying refill operations has started, and may benefit from inclusion in the SEIS to be available by 2026.

3. Detroit Dam proposed structural temperature control and passage actions (i.e., construction of a floating screen structure and selective withdrawal structure) were analyzed in the 2024 Opinion. In RPA 4.13.5, we requested that USACE reconsider continuing existing operational temperature management and provide an earlier passage solution sooner than would follow if both structures were built. Given the inclusion of RPA 4.12.2 to provide interim, but limited, operational passage through a deep drawdown at Detroit Reservoir with implications for downstream conditions, it is logical to add the actions that would provide longer term passage for consideration in the current SEIS.
4. RPAs that described expanded monitoring infrastructure, including any actions needed at Willamette Falls to replace current PIT antennas.
5. As hydropower deauthorization for individual dams was not included in the proposed action for consultation in the 2024 BA, we ask that USACE consider options other than fully deauthorizing hydropower (beyond the Cougar diversion tunnel passage measure already covered). This may include interim routes, and those to be developed for longer term passage, that may benefit from removing turbine operations.

We would hope to explore the above additions to the proposed elements of Alternative 6, as presented in meetings NMFS staff attended on May 19 and May 29, 2025. NMFS is also planning to complete additional review of the current proposed scoping options, up to the extension date of June 21. We did not review the Detroit Dam deep drawdown measure implementation here, as we expect to see more details in the draft SEIS.

We look forward to working with USACE to provide operations that meet the WVS authorized purposes, and the conservation needs of threatened ESA listed salmonids. If you have questions, please contact Anne Mullan of my staff, at anne.mullan@noaa.gov or 503.231.6267.

Sincerely,

Kate Wells
Assistant Regional Administrator
Oregon Washington Coastal Office

cc: Kathryn Tackley, Greg Taylor, Liz Oliver, Liza Wells, Rich Piaskowski, Dave Griffith, Garrett Dorsey, USACE
Mike Hudson, Brian Bangs, USFWS
Jesse Kintz, BPA
Lawrence Schwabe, Confederated Tribes of the Grand Ronde
Kelly Reis, Shaun Clements, ODFW

Herod, Megan K CIV (USA)

From: Michael Karnosh <Michael.Karnosh@grandronde.org>
Sent: Friday, June 6, 2025 4:50 PM
To: Oliver, E A (Liz) CIV (USA); Warner, Kathryn L CIV USARMY CENWP (USA); Lyon, Amanda A CIV USARMY CENWP (USA); Dorsey, Garrett L CIV USARMY CENWP (USA); Taylor, Gregory A CIV USARMY CENWP (USA); Bardy, April K CIV USARMY CENWP (USA); Janes, Kelly A CIV USARMY CENWP (USA); Clark, Steven J CIV USARMY CEMVP (USA); aemai@bpa.gov; alheredia@bpa.gov; aljohnson@bpa.gov; Alyssa.M.MUCKEN@water.oregon.gov; anne.mullan@noaa.gov; asnagra@bpa.gov; bitalac.emily@epa.gov; Briece Edwards; briggs.nicole@epa.gov; ceder@usbr.gov; 'Chris_allen@fws.gov'; djspear@bpa.gov; grace.goldrich-middaugh@deq.oregon.gov; gsashby@bpa.gov; heather.tugaw@deq.oregon.gov; jennifer.wigal@deq.state.or.us; jgbarton@bpa.gov; jhkintz@bpa.gov; Jeff Maslow; josie.thompson@noaa.gov; kathleen.wells@noaa.gov; Kelly Dirksen; Kelly.E.Reis@odfw.oregon.gov; Keri Handaly; kkoleini@usbr.gov; Lawrence Schwabe; lbchase@bpa.gov; Maier.Michelle@epa.gov; Marganne.ALLEN@oda.oregon.gov; Mbabaliye.Theogene@epa.gov; melissa.jundt@noaa.gov; michael_hudson@fws.gov; michael_hudson@fws.gov; Mike.L.MCCORD@water.oregon.gov; Rob.HIBBS@oda.oregon.gov; robert.brunoe@ctwsbnr.org; samuel.bankston@noaa.gov; sfrollins@bpa.gov; shaun.clements@odfw.oregon.gov; stbiegel@bpa.gov; Tom.Stahl@odfw.oregon.gov; Torey Wakeland; Vallette.Yvonne@epa.gov; Wigal.Jennifer@deq.state.or.us; zach.loboy@state.or.us
Cc: Kathleen George; Stacia Martin; Bryan Langley; 'Brett VandenHeuvel'; 'Caitlin Dols'
Subject: [Non-DoD Source] RE: scoping comments on WVS SEIS
Attachments: CTGR_scoping comment_WVS SEIS_060625_s.pdf

Good Afternoon Liz,

Please find attached written comments from Confederated Tribes of Grand Ronde staff regarding the SEIS scoping. CTGR may choose to supplement or modify these written comments, given the recent time extension on the scoping period.

Many thanks,
Michael

Many thanks,

Michael Karnosh
Ceded Lands Manager
Confederated Tribes of Grand Ronde
(503) 879-1316
Michael.Karnosh@grandronde.org

From: Oliver, E A (Liz) CIV (USA)
Sent: Friday, May 16, 2025 4:42 PM
To: Warner, Kathryn L CIV USARMY CENWP (USA) ; Lyon, Amanda A CIV USARMY CENWP (USA) ; Dorsey, Garrett L CIV USARMY CENWP (USA) ; Taylor, Gregory A CIV USARMY CENWP (USA) ; Bardy, April K CIV USARMY CENWP (USA) ; Janes, Kelly A CIV USARMY CENWP (USA) ; Clark, Steven J CIV USARMY CEMVP (USA) ; aemai@bpa.gov; alheredia@bpa.gov; aljohnson@bpa.gov; Alyssa.M.MUCKEN@water.oregon.gov; anne.mullan@noaa.gov;

asnagra@bpa.gov; bitalac.emily@epa.gov; Briece Edwards ; briggs.nicole@epa.gov; ceder@usbr.gov; 'Chris_allen@fws.gov'; djspear@bpa.gov; grace.goldrich-middaugh@deq.oregon.gov; gsashby@bpa.gov; heather.tugaw@deq.oregon.gov; jennifer.wigal@deq.state.or.us; jgbarton@bpa.gov; jhkintz@bpa.gov; Jeff Maslow ; josie.thompson@noaa.gov; kathleen.wells@noaa.gov; Kelly Dirksen ; Kelly.E.Reis@odfw.oregon.gov; Keri Handaly ; kkoleini@usbr.gov; Lawrence Schwabe ; lbchase@bpa.gov; Maier.Michelle@epa.gov; Marganne.ALLEN@oda.oregon.gov; Mbabaliye.Theogene@epa.gov; melissa.jundt@noaa.gov; Michael Karnosh ; michael_hudson@fws.gov; michael_hudson@fws.gov; Mike.L.MCCORD@water.oregon.gov; Rob.HIBBS@oda.oregon.gov; robert.brunoe@ctwsbnr.org; samuel.bankston@noaa.gov; sfrollins@bpa.gov; shaun.clements@odfw.oregon.gov; stbiegel@bpa.gov; Tom.Stahl@odfw.oregon.gov; Torey Wakeland ; Vallette.Yvonne@epa.gov; Wigal.Jennifer@deq.state.or.us; zach.loboy@state.or.us
Subject: May 19 WV SEIS cooperating agency meeting material

** This message has originated from an **External Source**. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email. **

All,

Please find attached the slides for our Monday May 19 Willamette Valley System Supplement EIS cooperating agency meeting. Looking forward to our discussion.

Thanks,

Liz Oliver
Project Manager
U.S. Army Corps of Engineers, Portland District
Cell: (503) 979-6256 (call/text)
https://www.nwp.usace.army.mil
Typical hours: 8:30am – 5:30pm PT
March 31 – June 9: out at 1:30pm on Mondays

The Confederated Tribes of the Grand Ronde Community of Oregon

Office of Ceded Lands
Phone (503) 879-1316
1-800-422-0232

9615 Grand Ronde Road
Grand Ronde, OR 97347

June 6, 2025

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
Liz Oliver, Project Manager
P.O. Box 2946
Portland, OR 97208-2946

via email to Liz.Oliver@usace.army.mil

Re: Scoping Period for the Supplemental Environmental Impact Statement for the Operation and Maintenance of the Willamette Valley System

Dear Ms. Oliver,

Thank you for the opportunity to provide comments. The Confederated Tribes of Grand Ronde ("Grand Ronde" or "Tribe") respectfully submit these comments to the U.S. Army Corps of Engineers ("Corps") for consideration in the development of the Supplemental Environmental Impact Statement for the Operation and Maintenance of the Willamette Valley System ("SEIS").

Grand Ronde is a federally recognized Tribe that includes more than 30 antecedent tribes and bands from western Oregon, northern California, and southwest Washington. Grand Ronde's treaty homelands extend from the Columbia River south, incorporating the Willamette Valley and extending to the California border. And though the original tribes and bands of the Willamette Basin were forcibly removed to the Grand Ronde Reservation at the western edge of the Basin, our connections to our homelands and traditions have remained unbroken.

The native salmon and steelhead of the Willamette River Basin, which we have relied upon since time immemorial, are integral to our collective history and way of life. Tragically, Upper Willamette River Chinook salmon and steelhead are facing extinction. Grand Ronde remains steadfast in its commitment to protect and preserve these imperiled species.

Grand Ronde is concerned about the narrow scope of the Corps' SEIS analysis. To ensure thoroughness, we strongly recommend the Corps approach the SEIS with a sufficiently broad scope so it can analyze the full range of possibilities available for fish passage. To facilitate meaningful input, we request that the Corps conduct scoping workshops with Grand Ronde and other cooperating agencies before completing the public scoping process for the SEIS. We firmly believe that a more robust and dialogue-oriented scoping process with cooperating agencies will greatly benefit the SEIS, aligning it more closely with the spirit and intent of the Water Resources Development Act of 2024. While we cannot directly speak for any of the other cooperating agencies, we are aware that federal (NOAA Fisheries and U.S. Fish and Wildlife Service) and state (ODA, ODEQ, OWRD, and ODFW) cooperating agencies have made requests to the Corps that are essentially identical to the Tribe's request above.

At the time of writing these comments, we are aware that the cooperating agency written comment period has been very recently extended. With this extension in mind, Grand Ronde reserves the right to supplement or modify these comments at its sole discretion.

I. Ending Hydropower Production at Willamette Valley Dams (Alternative 6)

Pursuant to the Water Resources Development Act of 2024 ("WRDA 2024"), the Corps may not complete its 30-year management plan for the Willamette River Basin "until it prepares and formally analyzes an alternative that ceases hydropower operations at the projects."[1] Given that Congress has directed the Corps to analyze deauthorizing hydropower in the Willamette Basin in three separate WRDA bills, this analysis deserves serious consideration.[2]

Grand Ronde strongly recommends the Corps analyze a comprehensive range of options within this alternative. The depth of this analysis should be akin to the analysis afforded to each alternative in the draft EIS. This must include a consideration of benefits, environmental consequences, and tradeoffs associated with Alternative 6 when compared to all other alternatives considered in the EIS, particularly when viewed through a no-hydropower lens.

The Corps should assess operational measures that would be feasible if hydropower were eliminated at all projects or select projects. At a minimum, Alternative 6 must include:

a. A dam-by-dam deauthorization analysis. The Corps must analyze each of the eight hydropower-producing dams in light of their unique configurations and operational considerations.

b. Additional volitional downstream passage operations. The Corps should evaluate measures to modify dams to allow run-of-river operations for most or all of the year, extended drawdowns, and measures evaluating passage opportunities by reconfiguring powerhouse routes from hydropower generation to non-power producing fish passage outlets at all projects. All deeper outlets, particularly diversion tunnels, should be evaluated for fish passage efficacy.

c. An assessment detailing the modification or removal of the reregulating dams. The Corps must evaluate the impacts of modifying or removing Big Cliff and Dexter dams, which are only used for hydropower reregulation. Under a no-hydropower scenario, operating these dams as run-of-river or removing them completely, will allow the Corps to evaluate operational changes to Lookout Point and Detroit, which are currently constrained by the presence and operation of the reregulation dams.

d. An analysis of costs. The Corps must compare the costs associated with Alternative 6 to those of the other alternatives. The Corps must evaluate the cost to continue to produce hydropower and fully describe the impact on ratepayers, which is significant as we understand it. The Corps should rely on the Bonneville Power Administration for the cost/benefit analysis for marketing hydropower.

e. A reconsideration of the rule curves. The Corps should consider altering the rule curves to provide more flexibility and to benefit needed flows for listed species. The Corps can provide water supply without following the hydropower-based rule curves. The Corps must also consider changes to other authorized purposes. The claim that removing hydropower will not change operations because other purposes must be maintained is not sufficient analysis. The Corps has the authority to significantly modify other purposes. For example, in rejecting the Corps' argument that it cannot implement drawdowns, the U.S. District Court for the District of Oregon stated, "[House Document] 531 contains much more than a general grant of discretionary authority and expressly provides that 'the schedules and rule curves developed should not be considered final if future development in the basin should alter the concept of any of the conservation requirements, or should research indicate that a change in reservoir regulation policy would be beneficial.'"[3] The Court noted that "HD 531 also contemplates prioritizing the needs of salmonids over

[1] WRDA 2024 Sec. 1326.

[2] See WRDA 2020 Sec. 218 (requesting an analysis of deauthorizing hydropower as a purpose at Cougar and Detroit dams) and WRDA 2022 Sec. 8220 (requesting a disposition study to determine the Federal interest in, and identify the effects of, deauthorizing hydropower as a purpose at all Willamette Valley hydropower projects).

[3] Opinion and Order, Northwest Env. Defense Center v. U.S. Army Corps of Engineers, Case No. 3:18-cv-00437-HZ at 20.

power production when necessary."[4] Like the drawdown example, the Corps has ample discretion to analyze modifications to authorized uses. The Corps must provide an analysis that factors in this discretion being used.

II. Implementing Deep Fall Drawdown at Detroit Reservoir

Pursuant to National Marine Fisheries Service's ("NMFS") 2024 Biological Opinion, the Corps should draw Detroit reservoir down in the fall to no more than 50 feet above upper regulating outlets for fish passage (1395 ft), "when possible given hydrology and hydropower activity in the North Santiam and other subbasins."[5] The Corps' drawdown analysis should address the diversity of life histories among listed salmonids and their corresponding biological needs. The Corps should work closely with NMFS to determine the best time to draw down for life history needs and the duration of time that will most benefit listed fish. Additionally, in light of Congress's directive in WRDA 2024, it is reasonable for the Corps to conduct this analysis through a no-hydropower lens to optimize fish passage options.

III. Conclusion

Once again, thank you for this opportunity; the Tribe may submit additions or modifications to these comments at its sole discretion. Grand Ronde appreciates the opportunity to provide these scoping comments and looks forward to continued engagement with the Corps throughout the SEIS process.

Respectfully,

Michael J. Karnosh

Michael Karnosh
Ceded Lands Manager

CC: Grand Ronde Tribal Council
Stacia Hernandez, Tribal Council Chief of Staff
Brian Langley, Interim General Manager
WVS-EIS Cooperating Agencies

[4] Id. at 21.

[5] NMFS, Endangered Species Act Section 7(a)(2) Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Response for the Continued Operation and Maintenance of the Willamette Valley System (2024) at 6.4-524.

Herod, Megan K CIV (USA)

From: no pot unstirred <nopotunstirred@protonmail.com>
Sent: Friday, June 6, 2025 1:11 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: sam sampace.com
Subject: [Non-DoD Source] Edited comment on Willamette River SEIS
Attachments: Detroit.odt

Earlier this morning I submitted a comment on the Willamette River SEIS. I am resubmitting an edited version to substitute for my earlier unedited version. You will note that there are no substantive changes to my comment. I have, however, added several missing citations to statutes and court cases. Thank you very much. My edited comment is attached.

Charles Pace, Ph.D.

Sent with Proton Mail secure email.

Date: June 6, 2025

To: ACOE Portland District

From: Charles Pace, Ph.D.

Attn: CENWP-PME-E / Willamette EIS

By email: willamette.eis@usace.army.mil

I am responding to your request for comments on scoping (1) the proposed drawdown of Detroit Lake, a project on the North Fork of the Santiam River that is operated by the US Army Corps of Engineers ("USACE"), and (2) eliminating hydroelectric production in the Willamette River sub-basin.

As a young boy scout I spent weeks during the summertime camping and fishing for resident fish—mainly rainbow trout and kokanee salmon–at Detroit Lake. I also fished for anadromous steelhead on the North Fork of the Santiam River with my uncle who was an educator at Mill City, Oregon. Over time I have followed news clips re algal blooms–more generally, water quality–as well as continuing 'skirmishes' throughout the Willamette River basin regarding measures for protection, mitigation and enhancement of salmon and steelhead.

My 'guess' is that a deep drawdown of Detroit Lake will have long-term consequences for the ecosystem and the local economy. In broad strokes, the socio-environmental impacts that should be scoped include: (1) impacts on water quality, e.g., increased turbidity downstream and potential impacts on water supplies; (2) potential harm/benefits for both resident and anadromous fish populations; (3) reduced recreational opportunities at the reservoir; and (4) the commercial effects on the local economy, particularly tourism.

In December 2024, Congress passed the Water Resources Development Act of 2024, which directed USACE to look at a new option, or "alternative," that would remove hydropower as an authorized function at certain Willamette Valley dams. Elimination of hydropower will likely have multifaceted effects on the stability of the transmission system, particularly concerning local grid resilience and black start capabilities which should be included in your SEIS.

While these facilities constitute a relatively small portion of the Pacific Northwest's total generation, their removal would reduce a source of flexible, renewable power and impact the ability to restore power after a widespread outage. The potential effects of elimination of hydropower production that should be scoped include: (1) impacts on transmission stability; (2) high-voltage substations in the Willamette River sub-basin;

and (3) system restoration capabilities. I'll briefly outline these below.

In analyzing the effects of eliminating hydropower on transmission system stability, you should address: (1) local voltage support and grid stability; (2) the capability to quickly respond to sudden changes in generation or load; and (3) reductions in local generation capacity.

High-voltage substations are critical nodes in the power grid, transforming voltage levels and directing power flow. The elimination of local hydroelectric generation could affect power flow dynamics and patterns, especially those that cause congestion on specific transmission paths if lost hydropower generation is not replaced by adequate upgrades in transmission import capability.

Elimination of local hydropower will reduce system operators' ability to energize local substations during 'black start' scenarios. Your analysis should address the impacts of substations having to wait for power to be restored from sources outside of the Willamette River sub-region. This is a very significant concern and your assessment should identify the specific substations (e.g., those operated by Bonneville Power Administration or Portland General Electric in the vicinity of the dams like Detroit, Big Cliff, Lookout Point, etc.

I'm also concerned that reductions in local generation capacity will play an out-sized role. Typically, environmental organizations suggest that local power can be replaced, e.g, by wind, solar and utility-scale electric battery storage. Wind and solar typically make a *de minimus* contribution to generation and are unpredictable.

Battery storage has many attractive attributes, but utility-scale battery technology is in its infancy. As we go forward, the failure of current technologies based on lithium will be the subject of actions brought under 42 U.S.C. 9601 et seq. for discharges of hazardous materials. Bonneville Power Administration, by transmitting and distributing power produced by utility-scale battery storage, is certain to be tagged as a "potentially responsible party" for funding remedial actions. See: Nu-West Mining Inc. v. United States, Case No.: 4:09-CV-431 (D. Idaho March 4, 2011).

My final comment is to suggest that the supplemental analysis include an alternative that, in my opinion, is "reasonable" and will address the purpose and need for the proposed action. More specifically, further analysis should be given to the Secretary of Defense exercising his authority under 16 U.S.C. 1536(j) with respect to the following federally-owned, "regulated" hydropower projects: (1) Big Cliff Dam on the North Santiam River; (2) Detroit Dam on the North Santiam River; (3) Dexter Dam on the Middle Fork Willamette River; (4) Foster Dam on the South Santiam River; (5) Green Peter Dam on the Middle Santiam River; (6) Hills Creek Dam on the Middle Fork Willamette River; (7) Lookout Point Dam on the Middle Fork Willamette River; and (8)

Cougar Dam on the McKenzie River.

I note that this alternative will not have any effect on the Northwest Power and Conservation Council's fish and wildlife program, which is currently being amended under the Northwest Power Act, 16 U.S.C. Chapter 12H. Similarly, my alternative will neither diminish nor expand the consultations on fish habitat required by the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. 1801 et seq., and will not change in any way the federal responsibilities under 33.US. 1251-1387, the Clean Water Act, as amended.

My proposed alternative is responsive to the supplemental analysis' purpose and need. It addresses the balance of hydropower generation and environmental protection without the formidable cudgels of the Endangered Species Act (ESA), 16 U.S.C. 1531-44, hanging over basin like a death star. In fact, this alternative would be the most direct and cost-effective method available to satisfy in full the statutory requirements of the ESA with respect to the Willamette River subbasin.

In my opinion, consideration of this alternative is an absolute necessity at this time for two reasons. First, the District Court of Oregon is not a court of competent jurisdiction for resolving conflicts at this level. Second, the end of "Chevron deference" portends unbridled juridical exuberance not only in the District Court for the District of Oregon, but also in the Court of Appeals for the Ninth Circuit. See: Loper Bright Enterprises v. Raimondo, 603 U.S. __(2024).

My suggested alternative based upon 16 U.S.C. 1536(j) is "practical" from a technical and economic feasibility standpoint. It is an alternative that would be easy to implement. Moreover, it is consistent with the basic objectives of the SEIS. It will avoid or substantially lessen its impacts on the socioeconomic environment while fully meeting the statutory requirements for survival and recovery of listed species.

In sum, my suggested alternative should be developed sufficiently to allow for meaningful evaluation, analysis, and comparison with other alternatives—including but not limited to the "no action" baseline. This concludes my comment. Thank you in advance for your review and consideration. I look forward to reading the SEIS when it is completed.

Herod, Megan K CIV (USA)

From: no pot unstirred <nopotunstirred@protonmail.com>
Sent: Friday, June 6, 2025 11:02 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] CENWP-PME-E / Willamette EIS
Attachments: Detroit.odt

Please find attached my comments re scoping for the Willamette SEIS. Thank you for the opportunity to provide comment, as well as your review and consideration.

Sent with Proton Mail secure email.

Date: June 6, 2025

To: ACOE Portland District

From: Charles Pace, Ph.D.

Attn: CENWP-PME-E / Willamette EIS

By email: willamette.eis@usace.army.mil

I am responding to your request for comments on scoping (1) the proposed drawdown of Detroit Lake, a project on the North Fork of the Santiam River that is operated by the US Army Corps of Engineers ("USACE"), and (2) eliminating hydroelectric production in the Willamette River sub-basin.

As a young boy scout I spent weeks during the summertime camping and fishing for resident fish—mainly rainbow trout and kokanee salmon–at Detroit Lake. I also fished for anadromous steelhead on the North Fork of the Santiam River with my uncle who was an educator at Mill City, Oregon. Over time I have followed news clips re algal blooms–more generally, water quality–as well as continuing 'skirmishes' throughout the Willamette River basin regarding measures for protection, mitigation and enhancement of salmon and steelhead.

My 'guess' is that a deep drawdown of Detroit Lake will have long-term consequences for the ecosystem and the local economy. In broad strokes, the socio-environmental impacts that should be scoped include: (1) impacts on water quality, e.g., increased turbidity downstream and potential impacts on water supplies; (2) potential harm/benefits for both resident and anadromous fish populations; (3) reduced recreational opportunities at the reservoir; and (4) the commercial effects on the local economy, particularly tourism.

In December 2024, Congress passed the Water Resources Development Act of 2024, which directed USACE to look at a new option, or "alternative," that would remove hydropower as an authorized function at certain Willamette Valley dams. Elimination of hydropower will likely have multifaceted effects on the stability of the transmission system, particularly concerning local grid resilience and black start capabilities which should be included in your SEIS.

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Battery storage has many attractive attributes, but utility-scale battery technology is in its infancy. As we go forward, the failure of current technologies based on lithium will be the subject of CERCLA/Superfund actions for discharges of hazardous materials. because Bonneville Power Administration, by transmitting and distributing power produced by utility-scale battery storage, is certain to be tagged as a "potentially responsible party" for funding remedial actions.

My final comment is to suggest that the supplemental analysis include an alternative that, in my opinion, is both "reasonable" and will address the purpose and need for the proposed action. More specifically, further analysis should be given to the Secretary of Defense exercising his authority under 16 U.S.C. 1536(j) with respect to the following federally-owned "regulated" hydropower projects: (1) Big Cliff Dam on the North Santiam River; (2) Detroit Dam on the North Santiam River; (3) Dexter Dam on the Middle Fork Willamette River; (4) Foster Dam on the South Santiam River; (5) Green Peter Dam on the Middle Santiam River; (6) Hills Creek Dam on the Middle Fork Willamette River; (7) Lookout Point Dam on the Middle Fork Willamette River; and (8) Cougar Dam on the McKenzie River.

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Herod, Megan K CIV (USA)

From: Traci Archer <ctygtes@wbcable.net>
Sent: Friday, May 23, 2025 5:05 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Scoping Comment - Detroit
Attachments: Public Scoping Comment For Detroit Reservoir Deep Drawdown.pdf

Traci Archer
City Admin/Recorder
City of Gates
503-897-2669
fax 503-897-6068

Any mail to and from this email address may be subject to Public Records Disclosure Laws.

City of Gates

101 Sorbin Ave. W, Gates, OR 97346
ph: 503.897.2669 email: ctygtes@wbcable.net
https://www.cityofgates.com

May 23, 2025

U. S. Army Corp of Engineers
Attn:CENWP-PME/ Willamette EIS
PO Box 2946
Portland, OR 97208-2946

RE: Scoping Comment – Detroit Reservoir Deep Drawdown

To Whom it may concern.

The City of Gates draws water from the North Santiam River. We are just a few miles downstream of Detroit Reservoir.

When the drawdown occurs, it may be catastrophic for the citizens of Gates. The City of Gates has a membrane filtration system that is not designed to filter highly turbid water.

I have met with the system operators in Lebanon. I learned about the nightmare they experienced when Green Peter Reservoir was drained. If we experience anything like were to happen there, we would simply not be able to filter the water.

We have been in touch with staff at the Oregon Health Authority and private consultants. One of the biggest challenges would be adding equipment to lower the turbidity of the raw water entering the water plant. We simply do not have much room at our site. Funding is another challenge for Gates.

The city has three to four days of storage. We are aware that the water from Detroit Reservoir has to pass through Big Cliff before coming down the river. That will likely extend the turbidity event much longer.

The city asks that Army Corp of Engineers please keep us in mind.

We are the first water system below Detroit Reservoir and will likely witness the highest turbidities.

Sincerely,

Greg Benthin
Public Works Superintendent

City of Gates AA/EEOE Complies with Section 505 of Rehab Act of 1973

Herod, Megan K CIV (USA)

From: josephj_87 <josephj_87@yahoo.com>
Sent: Friday, July 4, 2025 11:34 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Willamette Valley Hydroelectric Power

The Pacific Northwest is blessed with abundant, reliable, clean, and cheap hydroelectric power. Eliminating hydroelectric power will increase electricity rates across the region, hydroelectric power is reliable base load power that can be adjusted based on ever changing power loads during the day. Solar and wind cannot do that nor is coal or natural gas as environmentally friendly.

These dams also provide much needed water during the hot, dry, fire prone summers. We need more dams and more hydroelectric power, not less.

Joseph Jones

Cottage Grove Oregon

Sent via the Samsung Galaxy S25 Ultra, an AT&T 5G smartphone

Herod, Megan K CIV (USA)

From: Rogue Rider <jrwinfreyjohn@gmail.com>
Sent: Saturday, June 28, 2025 6:08 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Draw down.

The whole plan to build a dam without proper conservation efforts for the impact on wildlife in the first place was just plan selfishness on humanities part to begin with. Add in the fact that the odfw founder was the one that illegally planted small mouth into the Willamette River. A apex predator that consumes just as many salmon eggs if not more than native predators here. To me it seems that we just need to stop trying to fix our mess ups in the past, live with them, but learn from them. As long as our focus is in human needs, like having to live in the Willamette Valley which would be mostly under water without the dam, nature would be able to be well natural. If the existence of the salmon is a must. Tell everyone to pack up and move and blow the dam. Then nature will flow again. Otherwise just stop messing with stuff. Nature doesn't need us but we need nature. How much other life is taken when a draw down is done? Whether native or not we should respect all living creatures. Its our responsibility because we have the ability. We don't belong in this valley according to nature obviously. As long as we modify nature so we can the longer more things will go wrong. Just saying you might be doing people a favor by damming rivers and creeks but you sure are not doing mother nature or God any that's for sure they already provided everything we needed, but people were just not satisfied were they? Ever heard the saying, You can't fix stupid? It definitely applies here. Sorry I didn't edit this message.

John R. Winfrey
jrwinfreyjohn@gmail.com

Herod, Megan K CIV (USA)

From: RICHARD DOMINGUE <rkdomingue@msn.com>
Sent: Saturday, June 21, 2025 5:02 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Marc Liverman; David Moskowitz; Jennifer Fairbrother (jennifer@nativefishsociety.org)
Subject: [Non-DoD Source] Study Plans for Supplemental Willamette Basin EIS

While developing successful fish passage systems and defining operations to facilitate fish passage are the greatest needs in the basin, developing a systematic view of operations to meet authorized water demands in the basin is also important to meeting project objectives. The greatest need after developing safe and effective fish passage systems and operations, is a systematic view of operations and effects. For example, if the McKenzie basin is flowing substantially above the discharge needed to protect salmon in the McKenzie and the Willamette while meeting other needs including flood control, storing additional water to reduce the subsequent risk of shortage would improve system water management. Historically, the Project storage has been managed in accordance with Tea-Cup diagrams with each storage reservoir managed independently. A systems approach, identifying water needs and the stored water available to meet those needs would likely improve the frequency that operational targets are met. Dry years would likely see the most benefit from systemic reservoir management.

Please place my comments into the public record. Thank you.
Rich Domingue

Herod, Megan K CIV (USA)

From: Jim Quiring <jimquiring@comcast.net>
Sent: Saturday, June 21, 2025 8:39 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Jim Quiring
Subject: [Non-DoD Source] Detroit Lake drawdown comments

June 21, 2025
To: ACOE
RE: Willamette EIS

I live in Salem, Oregon where some of our domestic water supply comes from the North Santiam River. I have friends in Stayton where Santiam River waters also provide domestic water, and I have friends involved with both agriculture and recreation in the Santiam watershed. With these close ties to the area, I see clearly that we need to guard water quality for all these uses in each city and area.

In addition to the above, we also must look out for the needs of our native fish. It is believed that salmon, similar to those we see here today, may have been coming to these waters for as long as two million years. They have been an important part of Native American culture for more than ten thousand years. And, for many of us living in Oregon today, these fish are a highly valued part of what makes Oregon a special place to live.

Considering all of this, I encourage that we all do everything we can to support and save these ancient fish runs, including drawing down the water level in Detroit Lake at times in the year when it will benefit fish runs the most. This should be done, however, while also taking every possible action to retain water quality for domestic, agricultural and recreational uses. (I see that there are many ways identified to mitigate adverse effects on water uses during the proposed draw downs.)

Salmon runs are part of our state's heritage. We can work together to find the best ways to protect fish runs while also looking after the wide range of human needs. The next generations of Oregonians will thank us for facing this challenge and doing our best to retain salmon and steelhead runs for the future.

Thank you for considering my comments.
Sincerely,
Jim Quiring

Herod, Megan K CIV (USA)

From: Jody Marshall <jody8111@comcast.net>
Sent: Friday, June 20, 2025 2:29 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Jody Marshall
Subject: [Non-DoD Source] Willamette Valley System Supplemental EIS Comments

Below are my comments to the WVS Supplemental EIS

1. Your NEPA process is confusing. Looks like the FEIS was based on 2008 biological opinion from NMFS. Therefore, the SEIS should provide the reader of the collec. ve actions of the biological option NMFS issued in 2024 on the entire system as Judge Simon stated in his opinion on the FCRPS.

2. To date, it appears that the US Army Corps of Engineers is not able or willing to operate the WVS without violation of many important environmental laws such as:

A. ESA
(1) as Judge Hernandez determined in his 2021 opinion.
(2) Corps did not start consultation with NMFS & USFWS until 2007, many years after Chinook salmon and steelhead were listed under ESA for protection.
(3) Corps did not follow all or most of the requirements of the 2008 biological opinions from NMFS and USFWS

B. NEPA -
(1) Corps did deep drawdown at Green Peter before NEPA was completed and even what was in DEIS was incorrect. Analyzing it after-the-fact is not the intent of NEPA. The Corps states that near-term measures required by judge Hernandez do not require NEPA. How nice for the Corps getting a pass on skipping environmental reviews because they never complied with the laws and regulations in the past.
(2) the effects described at the public meetings held in Sweet Home were incorrect by Corps saying there would be no drastic effect. The Corps should've used the outcome of effects from deep drawdown at Fall Creek as a basis for effects, but did not.
(3) At same public meeting, a concern was raised that the corps was really looking at removing the dams. Corps responded by saying dams are here to stay. Corps should make that an alternative and be upfront on why these structures that are past their design life should remain. If flood control, I suggest you use your top-rated engineering staff to find other ways to achieve that objective and end these industrialized river corridors.
(4) corps did not initiate any NEPA system-wide since 1980 when then last EIS was written. No fish were listed under ESA at that time. Issuance of the 2008 biological opinion required a system-wide analysis, which the Corps ignored for over a decade.

C. CWA -
(1) Again, the deep drawdown at Green Peter resulted in the release of enormous amounts sediment, and the Corps failed to seek approval under Section 401 of the CWA with ODEQ, as done at Fall Creek. Also, are there small releases of oil from hydro dam facilities that also need to be permitted?
(2) TDG releases are not compliant with ODEQ requirements and are over the limit allowed.

D. NHPA - WVS was not in compliance for many years until 2022 or '23. NHPA was passed into law in 1967.

E. Safe Water Drinking Act. HABs and turbidity from the Corps actions have affected water. HABs affected Salem water supply, and unlawful turbidity releases affected drinking water in Sweet Home, Albany & Tangent and caused damage to these cities water treatment facilities.

2. I want clean water full of wild salmon along with sustainability in the WVS rivers and canyons. I don't trust the Corps can make that happen based on their past & recent management of the WVS, including the court cases challenging them on their mistakes & failings.

3. Based on alternatives Corps says it will study, I think hydroelectric power should be de-authorized.

4. Based on Corps failings to follow and uphold these environmental laws in a transparent and accountable way, I hope the Corps is removed from the DOD and DOA for civilian actions, and the DOA can have their own Corps for military facilities and actions. Maybe move a civilian Corps to DOI. This will help remove a military management style that doesn't give a crap about the environment. Also, by being in DOI or other department, that will provide civilian leadership, and hopefully decision makers will be around longer than the Commanders who are assigned over districts and regional offices for 2 to 3 years and can comprehend the effects of their actions so they are more accountable to those "environmental things' that the Army fails to consider or address.

Sent from my iPad

Herod, Megan K CIV (USA)

From: Brian Posewitz <brian@waterwatch.org>
Sent: Friday, June 20, 2025 12:29 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Comments on Scoping for Willamette Valley Project Supplement EIS

Greetings,

Thank you for the opportunity to comment on scoping for the Willamette Valley Project (Project) supplemental EIS on deep drawdowns at Detroit reservoir and deauthorization of hydropower. WaterWatch of Oregon (WaterWatch), which works to protect and restore instream flows in Oregon's rivers and streams and to ensure wise management of Oregon's water resources generally, submits the following comments:

1. Please consider the impact of both deep drawdowns and hydropower deauthorization on the ability of the Project to meet flow targets for fish in Willamette Basin tributaries and the mainstem river, including flow targets designed to mitigate excessive water temperatures in the middle and lower Willamette River in summer and early fall. WaterWatch has invested significant time and effort in advocating for reservoir storage allocations for fish and wildlife and instream protection of water released from storage for fish and wildlife. Deauthorization of hydropower at the dams would likely provide increased flexibility and more stored water for those purposes. We would appreciate an express analysis of that in the supplemental EIS as well as an analysis of how deep drawdowns at Detroit reservoir could impact the amount of stored water available to meet flow targets in the Santiam rivers and the mainstem Willamette River.

2. Please prioritize survival of threatened salmon and steelhead in the Willamette Basin. Fish threatened with extinction and protected by the Endangered Species Act should be given top priority in the analysis, even if measures that will improve their chances of survival may detrimentally impact other interests such as reservoir recreation, agricultural irrigation, peak season increases in municipal water demands (generally for outdoor watering of ornamental plants) and hydropower production/revenue.

3. While prioritizing threatened fish, please also include analysis of potential impacts on other fish and wildlife in the Basin. They are part of the environment and should be considered.

4. Please do not unduly constrain the supplemental analysis with restrictive sideboards based on prior policy decisions and other authorized purposes. For example, the supplemental analysis should consider how impacts might vary if the preferred alternative in the general EIS were different, and the analysis should be allowed to change the preferred alternative in the EIS if warranted. Also for example, the analysis should be open to modification of reservoir rule curves that do not create undue flood risks, and to reasonable modifications of dam and reservoir structural components. Finally, as noted above, the analysis should allow for potential impacts to other potential purposes and authorizations, including reservoir recreation, agricultural irrigation, peak season increases in municipal water demands (generally for outdoor watering of ornamental plants) and hydropower production/revenue.

Thank you for considering our comments.

Regards,

Brian Posewitz, Staff Attorney
WaterWatch of Oregon
213 SW Ash St.

Portland, OR 97204
(503) 432-8249
Email: brian@waterwatch.org

Herod, Megan K CIV (USA)

From: Rose Stephens <rosenbob21020@gmail.com>
Sent: Thursday, June 19, 2025 4:00 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Don't take out any more dams.

Sent from my iPhone
Dear Sira
Please
Don't take out any more dams!
Dams save fish,
Thousands of fish died as well as elk from taking out the Klamath Falls dam.
Seals are what's killing the Salmon fish population.
Thank you
Rose Stephens

Herod, Megan K CIV (USA)

From: Michele Tesdal <MicheleTesdal@protonmail.com>
Sent: Wednesday, June 18, 2025 10:07 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Drawdown comment - Tesdal, Detroit Resident

To USACE:

I am a city councilor from the City of Detroit, OR, but I am writing this public comment as a citizen. I have a BS degree in Natural Resources and worked with private landowners in many Oregon counties for 21 years; about 18 years of my conservation work was in Marion County. I worked with the USDA - Natural Resources Conservation Service (NRCS). Our goals were to conserve and manage wisely: soil, water, wildlife with full consideration of the farmers and land users. We started with the 'do no harm' point of view regarding natural resources and the farming/ranching communities. I referred to the Endangered Species Act and the T&E species list with all work that was considered ground disturbing.

I am saying this to show that I am familiar with the goals of the different agencies that are at play with the drawdown of the Detroit Lake/Reservoir.

As a citizen, city councilor, natural resource specialist, I stand firmly against the drawdown because it will or could cause: a lack of irrigation water for the farmers and their crops during crucial growing times, a lack of water during fire season, a fish kill of species existing in the lake, a shortage of drink water for some of the Willamette Valley communities, and municipal water systems will have catastrophic filtration issues.

The recreation aspect should be mentioned as well; here in Oregon, we have recreation choices, but our dam created a lake that is close by, where people can come and take a break from their hectic work lives and schedules. It is a place where families can reconnect while having fun and making memories that they will not forget. This absolutely has value too. These people pay taxes, wake up everyday and go to work - there needs to be some period of enjoyment for this toiling especially with the government coming down hard on it's people with the continuous pressure to take more and more from them by way of taxes.

I know there is pressure from well-funded environmental groups and tribes, but please consider the masses of citizens who haven't organized themselves with a group (just yet). Some of us haven't taken the time, because of our very busy lives.

Please do not lower the lake level in the early fall and do everything possible to avoid fish kill and downstream sediment issues.

Don & Michele Tesdal and family.
Detroit, OR residents.

Sent with Proton Mail secure email.

Herod, Megan K CIV (USA)

From: susieq97446 <bands97446@gmail.com>
Sent: Tuesday, June 17, 2025 2:40 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Dam

I am begging you to NOT drain OR DESTROY DETROIT DAM.
The dam has done a fabulous job just as it is for over SEVENTY YEARS!!
LEAVE IT ALONE.
Sincerely,
Susan Kesti

Herod, Megan K CIV (USA)

From: Ben Roche <themud@gmail.com>
Sent: Wednesday, June 11, 2025 2:07 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Willamette Dam Preservation - Oppose Draw Downs

I Support the Preservation and Enhancement of Detroit Dam –
I am in Opposition to Harmful Drawdowns

To Whom It May Concern,

I am writing to express strong support for the continued preservation and enhancement of the Detroit Hydroelectric Dam, a cornerstone of Oregon's infrastructure that provides critical flood control, renewable energy, and water stability to the Willamette Valley and beyond.

This facility has long served as a bulwark against the catastrophic floods that once plagued our region. With changing climate patterns increasing the frequency and intensity of storm events, the importance of robust flood control infrastructure like the Detroit Dam cannot be overstated. Preserving and upgrading this dam is not just prudent—it is essential for the safety and sustainability of our communities.

Moreover, the dam provides renewable hydroelectric energy, a vital and consistent source of power that helps Oregon meet its clean energy goals without the volatility of intermittent sources. In a time when energy security and carbon reduction are national priorities, abandoning or undermining this asset would be an unforced error of the highest order.

However, I must also voice firm opposition to the current drawdown practices being conducted under the guise of fish recovery. The deep seasonal drawdowns have proven environmentally damaging, destabilizing aquatic ecosystems, decimating shoreline habitats, impairing water quality, and creating conditions that are arguably more harmful to fish than helpful. The science behind these measures is questionable, and the real-world impacts—dust storms, algae blooms, economic harm to recreational areas—are both obvious and devastating.

We need balanced, science-driven policy that weighs all environmental factors, not a single-species management approach that ignores the broader consequences. I urge the Corps and associated agencies to adopt a more comprehensive and transparent strategy—one that continues to protect fish while also safeguarding our communities, economy, and natural landscapes.

Please preserve and enhance the Detroit Dam—not just for flood control and energy, but for Oregon's future. And please stop the unnecessary and harmful drawdowns that are doing more ecological damage than good.

Respectfully,

Ben Roche
Albany, OR

Herod, Megan K CIV (USA)

From: Anthony Caligure <anthony.caligure@icloud.com>
Sent: Wednesday, June 11, 2025 6:49 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Public Comments

Take the dams down
Sent from my iPhone

Herod, Megan K CIV (USA)

From: Roger Bell <rbofrbjb52@comcast.net>
Sent: Sunday, June 8, 2025 4:41 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] SEIS for Willamette Valley Water System

Took a while but I finally found the section referenced in the WRDA of 2024 that is the driving force behind item 1 of your SEIS requirements.

The paragraph titled "1. **Studying a permanent end to hydropower production at Willamette Valley dams"** is a very overreaching statement. At the end of the body of the paragraph it reads "...prepare and formally analyze an alternative that ends federal hydropower operations in the Willamette Valley." Not being a legal beagle, I don't know if "federal hydropower operations" means "any" hydropower operation or only those that are operated by the federal government as opposed to those operated by utility companies - very confusing. Another thing missing is a list of those "hydropower operating dams" that would be considered as on the chopping block. I would consider that essential information.

From my perspective on paragraph 1, I offer this excerpt from the wording in the WRDA of 2024, Section 1326. It is significantly less of an overreach, stating "... projects for flood control, navigation, and other purposes, Willamette River Basin, Oregon, authorized by section 4 of the Act of June 28, 1938 (chapter 795, 52 Stat. 1222; 62 Stat. 1178; 64 Stat. 177; 68 Stat. 1264; 74 Stat. 499; 100 Stat. 4144), until the Secretary prepares and formally analyzes an alternative that ceases hydropower operations at the projects, notwithstanding hydropower being an authorized purpose of such projects." I'm sure if you ask a person that wants all dams removed, they would interpret that statement to mean that only the original flood control purpose is a valid reason for keeping a dam in place. Call me crazy, but I'm thinking that any hydropower dam would have been authorized for construction, and that hydropower dams are necessary to help reduce the carbon footprint that seems to be very much inline with the current Oregon political focus - just saying. Side question: So how did this paragraph even get into the WRDA of 2024? It would be nice to know which of our federal folks either put it in or didn't take the time to have it removed.

Regarding paragraph 2 of the SEIS, as of right now, I have not found the "*Biological Opinion"* from the National Marine Fisheries Service (I'll continue to look). However, the idea just sounds stupid - my opinion. At the risk of slamming myself, I'm reminded of an analogy between opinions and a certain body orifice - "Everyone has one, and everyone thinks the other persons stinks." Bottom line, why does the NMFS opinion matter more than that of Oregonians who live, work and recreate at Detroit Lake and it's down river communities?

I sincerely hope someone at the USACE will show the courage and determination to challenge this gross overreach with regards to hydropower in Oregon and maybe ask the current administration to take a closer look at NMFS and their "Biological Opinion". What I could find indicates that the USACE is doing a good job balancing the needs of the human species and the continuation of fish species. So why the need to go so radical as to implement a deep reservoir drawdown at Detroit Dam? I say leave you folks alone and let you continue to do the job you're good at.

Roger Bell
Salem, Oregon

Herod, Megan K CIV (USA)

From: jimrabe1 <jimrabe1@aol.com>
Sent: Saturday, June 7, 2025 9:46 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit drawdown

Please register my dislike of the proposal to drawdown Detroit reservoir.
Issues of water quality, and amounts available becomes an issue for residents.
When the drawdown was used on Green Peter, it increased turbidity, which resulted in diverting fish into the Santiam and Northfork of the Santiam.
I think a better solution is to create Salomon breeding area below Big Cliff dam on the Santiam and on the Northfork. By expanding those areas to traditional breeding size, as 71% of this has been locked up by dams, you have the potential to address a couple of issues.
This would take pressure off the hauling program, works okay going up, but not so much heading down.
Wouldn't have to drawdown which effects many stakeholders water quality, amounts, recreational activities; especially a hard hit economy devastated by recent fires. (Detroit et al)
Also removes the argument for taking out the dams completely, which would be an expensive waste of resources.
I hope you consider expanding breeding areas for fish to naturally have an area that would be both safe and productive for them and people directly effected by your decision.
Sincerely,

Jim Rabe
Property owner on the Northfork of Santiam.

Sent from my Verizon, Samsung Galaxy smartphone

Herod, Megan K CIV (USA)

From: Paul Donheffner <paul4oha@gmail.com>
Sent: Friday, June 6, 2025 8:20 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Willamette Valley EIS

One of my first jobs was working as a temporary employee for the USACOE Upper Willamette Valley Projects Office located at the base of Lookout Point Dam. I was assigned to write and update resource management plans for all the projects covered by that office. It gave me a first hand look at how and why these dams were created, and the multiple benefits that the Corps has to balance to make them work.

My career job was as Director of the Oregon State Marine Board, the boating agency for Oregon. It involved working to improve public access and provide for safe boating on all of the Corps reservoirs throughout Oregon. The lakes created by these dams are some of the most important recreation assets in Oregon. I speak from experience.

Detroit Reservoir is consistently one of the top 10 boating lakes in Oregon. Green Peter used to be there too until it was destroyed by the horrific drawdown that destroyed its kokanee fishery.

The supplemental EIS is intended to address the proposed Detroit kill it drawdown, and the end of hydroelectric power generation at all Willamette Valley dams.

Let me address the Detroit drawdown first. This is the dumbest idea I've heard in my entire career. The effect of this experiment has been shown at Green Peter: The complete elimination of a successful kokanee fishery that supported thousands of angler days, and the destruction of downstream drinking water supplies for Sweet Home and Lebanon. If a farmer, logger or developer put that much sediment into a river, quite simply, they would go to jail and pay massive fines. The COE shouldn't be allowed to get away with this kind of environmental devastation without consequences. The lesson from Green Peter shouldn't be repeated in Detroit. Period! Doing this kind of landscape wide experiment in the "hope" of returning salmon is one of the dumbest things imaginable. If the COE wants more Salmon in the North Santiam River, build a hatchery....it would be far cheaper and more likely to produce fish.

It is inconceivable that a biological opinion written by unelected bureaucrats could drive the Corps to jump off a cliff. Where is the pushback from the Corps to say this ain't gonna work? To say that the "science" behind this experiment is "sound" tests everyone's credibility. This stuff is totally unproven, and if Green Peter is the example, it's doomed to failure. One lake fishery ruined, so let's go ahead and destroy another one? You never know? How many failures before you realize this "science" is just wishful thinking?

Please analyze the cost benefit of losing the entire kokanee fishery on the lake, and the economic impact of this on the City of Detroit and all the angler days that will be lost. No one fishes for kokanee at Green Peter now that the COE destroyed that fishery. What are the costs of the losses at Detroit and the downstream impacts? How does all that sediment impact downstream fisheries? How much will the drawdown violate Clean Water Standards for turbidity and suspended solids? What is the honest cost? And how does this honest cost compare to the theoretical benefit of a few salmon that might survive this experiment?

What is the cost of all the lost boating opportunities if the lakes don't refill due to low water years after a massive drawdown? Put the odds on that.

Regarding the elimination of power production: The last I heard, we're facing an electric power shortage. The push to go "green" and reduce carbon emissions had Oregon and the national on a quest to find clean sources of energy, especially renewables. There is no cleaner source of power than hydropower that already exists. It doesn't require new windmills that kill birds, nor solar farms that consume wildlife habitat and require new updates to the grid. The Willamette Valley projects may not be a major contributor, but they do provide clean, dependable power on an existing grid. To say that it would be crazy to take them off line is an understatement. If anything, the Corps should be looking at ways to make them more efficient.

And, while this isn't likely, this country should be looking to build more dams for water supply, irrigation and power production. We need all of the above. But first and foremost, don't eliminate the supply we already have, that's paid for, connected to the grid, and working. Let's not be stupid.

I've worked in government long enough to know that nobody is really listening to any of this, and being cynical is hard. We're born optimists, but experience creates cynicism.

The optimist in me told me to give this my best, because otherwise I haven't tried.

Please don't screw up a system that has been fine tuned over many years. The Willamette projects aren't perfect, but they do the best they can to provide multiple benefits and to ration misery when need be. I appreciate them more than most people will ever know.

Please add me to the list for updates on the Supplemental and other news of what lies ahead in this process.

Paul Donheffner
5933 Gath Rd SE
Salem, OR 97317

paul4oha@gmail.com

Herod, Megan K CIV (USA)

From: Michael Mullejans <michael_mullejans@yahoo.com>
Sent: Friday, June 6, 2025 8:58 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] The Detroit Deep Drawndown Project -- 2026

Dear Sirs:

The projected "*deep drawdown*" at Detroit Lake in 2026 would have serious, immediately disastrous, and costly consequences for the water treatment systems of the cities of Stayton, Salem and vicinity; it would cause a severe disruption of the livelihoods of local populations in the towns of Detroit and the surrounding region's economic well-being---not to mention, incur drastic consequences for the lake and tributaries' ecosystems themselves...

There is no denying that this is an unpopular project.

To the poorly informed, large populations affected, the project seems drastic, arbitrary--even absurd to some.
It is indeed quite difficult for people to understand how the daily lives of thousands can be held for less important than the preservation of some fish in such a drastic way---when in so many other fields, we as a society do not seem to hold much value to the lives of animals---and the ecosystem in general. There is no shortage of examples... the indiscriminate and poorly regulated abuse of pesticides and herbicides, which decimates useful birds and insects by the millions, the cattle, pork and poultry industry, with its inhumane conditions and horrendous pollution of streams and the aquifer, salmon and other commercial fish farms, the testing and use of ultrasound weaponry in oceans, the dangerous nuclear waste associated to Hanford's leaky tanks in our own backyard... there are, unfortunately, numerous examples.

Please reconsider these plans.

The Army Corps of Engineers has accumulated a history of noble accomplishments; it enjoys a glorious past.
There seem to be other ways to serve our beautiful region, while causing less disruption.

Thank you for your consideration,

Michael Mullejans
Stayton, Oregon

Herod, Megan K CIV (USA)

From: Robert Powell <bbrocketb@bctonline.com>
Sent: Thursday, June 5, 2025 9:48 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Robert Powell
Subject: [Non-DoD Source] Supplemental EIS / Detroit and Valley / Deep draw down & hydro pre-planning

Good day

This following material and my observations come from an 80 year experience, a life of assistance to mankind
and the stewardship of species. My interest as I spoke with the Corp. fish biologist is to provide material to
assist in specifics the fisheries species in decline. This is in response: History is the engine of the future, and
in the case of Salmon, coho and King or chinook political ideology, pseudo-science must give way to common
sense.

As one who was and maintains relation to the local human souls, and the stewardship of all species
I wish to place on record issues to this process that was ill created in the initial premise, manifestly encouraged
through years of shaming a life providing source. Some back to the 1960's.

The mission premise of this operation is flawed. Why? Both, Political deception and Military deception are twins
in the use of deception for cover of multi-mission events. This is a non-negotiable truth, in aspects of gaining objective
with intent by use of the tools of deception.

The Agency to Agency issue is now the first order of needed change. The Corp. of Engineers personnel are
not with ill intent as being trapped, please note. As an eyewitness to other actions not discussed from 1966 to
1993, and continuing as a steward of species including both humanity and the salmon, the entire project is in
need of pause, or better, after the horrendous damages to the very reason to use "stopping. in this case, in
pre-planning for the differing objective, needed information has been kept out of the toolbox of the two entities,
by a set of regulations. Entity to entity, negates true Congressionally mandated citizen involvement.

if the fish are the initial concern, then the steps taken prior, implicitly are and have been injurious to the fish and
many other species for that matter. The damage done by possibly illegal dam removal, and silt travel, have killed

thousands of many species, and polluted to literal extinction an entire river. Linn County Oregon, lost the use of
filtration in two days throughout Linn County Oregon. Millions of dollars are in tort claims for these various unnecessary
decisions, based on incorrect premise. Here is incorrect premise - Dams are the reason for declining fish
runs. While that is great fodder for fund raising by the NGO groups, junk science and outright ideological agitprop
have tainted the true need for discourse. The issue of unintentional mis-application of science (bias & zealotry)
is manifest in review of this NOAA document: https://www.fisheries.noaa.gov/species/steller-sea-lion

Anyone who has actual experience in fishing from many miles out at sea to the complete hypocritical handling
of the predator to the salmon and other species at the river entrances, docks from San Francisco all up the west coast
can smell and view the up to 2,500 pound males. Sea lion count is out of species food supply balance. Photos and
anecdotal accounts, noted a much lower count, while a higher fish species counts. New and more valid research
shows a complete correlation between sea lions numbers and declining fishery numbers.

The process of Agency to Agency, in this issue must be paused, as the two are disparate. The incalculable economic damage, security cost
to families, and totally unnecessary reliance of double down via wasted money in so many aspects. The process in this
case is in fact unsustainable. This is without rancor an attempt to provide eyewitness to pseudo-science to promote
an altogether more unsustainable situation. Wind and solar have no, I repeat no redundancy. Financially mortgage free
power is and has been the blessing of stewardship and common sense for ones.

1. The Premise should be singular as well as transparent. Current flawed process, does not consider other factors
in the investigation of removing of hydropower, by either dam removal, initially by direction of: UNITED NATIONS
ENVIRONMENTAL PROGRAM as the solution - Slide # 13
: http://www.slideshare.net/slideshow/embed_code/28345505

2. Since the disaster in Linn County Oregon, the "analyze an alternative that ends Federal hydropower operations
in all the Willamette Valley Dams" must now include the mandated Coordination process. The rules for this process
have been provided the Commander of the Corp. of Engineers. The rules pertain to ALL agencies.

2.a https://muleapi.blm.gov/sites/blm.gov/files/Services_CADRCooperatingAgencyGuide.pdf

2. The Mandate for Coordination, considering the initial horrible damages must now be engaged. Congress mandated this use after proclamation in 1972 or so.

Quote from Congressional Mandate material:

"The first statute wherein Congress began to define the coordination process is the National Environmental Policy Act (NEPA), 42 U.S.C. 4331, in 1970. Also of importance, NEPA set forth a national intention of reaching a harmonious and productive environment for the entire natural environment....including humans; it required all federal agencies to prepare studies and statements of impacts, including the cumulative impacts of any project studied; and it established the President's Council on Environmental Quality (CEQ), attached to the White House, to provide oversight of implementation by all federal agencies, whether or not there is a NEPA project involved".

3. The ESA, and EPA has been modified over time: https://www.epw.senate.gov/public/_cache/files/2/d/2d30f39e-2fde-4b37-8810-32fa21b6e6bd/01AFD79733D77F24A71FEF9DAFCCB056.epaplaybookunveiled.pdf

4. Decisions made concerning ESA and either un-intentional or fraudulent listings in the past are a large part of the declining salmon runs and from an eyewitness position, since specifically 1992-4 with intent. In other words the salmon, coho, and all other species are being used for cover for an entirely, more disingenuous purpose. To become an active eye and nasal witness, the San Francisco, or closer Newport Oregon docks tell the story of mis-balance of species through both omission and commission.

5. The Corp. of Engineers has information on and initially showed interest in a device that would be a one step at a time approach to protection of the fisheries, especially at the dams, in front of the fish ladders, . The intent for years in the open media publishing and environmental movement, has been dam removal. This in fact was done, in Southern Oregon, to horrific damage, and done possibly illegally. Tort claims will tell in this, as violations of the ESA, interestingly occurred to thousands of fish and other species and a complete elk herd. Taxpayers are the victims, and the tribes being used by groups with differing intent. This is happening because of the Woke education, and endless pandering to emotion verse common sense. With humor, if your eyes confuse you, your nose with take up the slack at Newport Oregon.

From an individual who was schooled in the NEPA Coordination process, it is my opinion that the haste in promulgating

the orders for all this, and the signing of the last piece just days before a new Administration was to come into existence

was I suggest intentional. (Be advised that I am a member of the Federal system (retired) and my oath is to Country,

specifically not party, nor U.N.

I note this below, as Sir Julian Huxley director of the UNESCO educational arm of the UN stated:

- 1946 - UNESCO Education is instituted. 1946 - 1948: 1948: UNESCO: Its Purpose and Its Philosophy by Sir Julian Huxley (the first director-general of UNESCO, 1946-1948) is published, in which Huxley declares: "The general philosophy of UNESCO should be a scientific world humanism, global in extent and evolutionary in background... Political unification in some sort of world government will be required...Tasks for the media division of UNESCO (will be) to promote the growth of a common outlook shared by all nations and cultures...to help the emergence of a single world culture... Even though it is quite true that any radical eugenic policy will be for many years politically and psychologically impossible, it will be important for UNESCO to see that the eugenic problem is examined with the greatest care, and that the public mind is informed of the issues at stake so that much that now is unthinkable may at least become thinkable." Excerpts from this volume were reproduced under the title, "A New World Vision" (The Humanist, March/April 1979). The Fabian Socialist Huxley, who was named 1962 "Humanist of the Year," elsewhere said that humanism's "keynote, the central concept to which all its details

- 1961 - Sir Julian Huxley creates the "World Wildlife fund" to coincide with his overt position on "Humanism", "Globalism" coupled with "Eugenics" as the tree legged stool noted as Humanism, godless entity by definition considers animal species equal or above man.

Here is political deception I speak of. Some historical quotes to gain proper understanding of Orwells Theory of Doublespeak& Doublethink concerning the deception in Climate political language. Orwell noted:

Doublespeak: language that deliberately obscures, disguises, distorts, or reverses the meaning of words. (author) this is major element of the commune system.

Doublethink: both know and to not know, to be conscious of complete truthfulness while telling carefully constructed lies, to hold simultaneously two opinions which cancel out, knowing them to be contradictory and believing in both of them, to use logic against logic.

Quote: "The common enemy of humanity is man. In searching for a new enemy to unite us, we came up with the idea that pollution, the threat of global warming, water shortages, famine and the like would fit the bill. All these dangers are caused by human intervention, and it is only through changed attitudes and behavior that they can be overcome. The real enemy then, is humanity itself." — Club of Rome. Founded 1968.

Quote: "No matter if the science of global warming is all phony... climate change provides the greatest opportunity to bring about justice and equality in the world."-
Christine Stewart, former Canadian Minister of the Environment.

Quote: “The data doesn’t matter. We’re not basing our recommendations on the data. We’re basing them on the climate models” Prof. - Chris Folland, Hadley Centre for Climate Prediction and Research.

Quote: “Global Sustainability requires the deliberate quest of poverty, reduced resource consumption and set levels of mortality control.”
(Read Eugenics) -
Professor Maurice King —Director of the UN Rio Accord-

Quote: “the resultant ideal sustainable population is hence more than 500 million but less than one billion.” - Club of Rome, Goals for Mankind.

Quote: “Current lifestyles and consumption patterns of the affluent middle class -involving high meat intake, use of fossil fuels, appliances, air-conditioning, and suburban housing - are not sustainable.” - Maurice Strong, 1992 Rio Earth Summit. Mr.Strong was a Brundtland Commission senior member.

In summation: I emphatically suggest separation of premises: The Agency to Agency process damages are in the millions.
The all or nothing screed by the environmental entities should, in this specific case of National Security (electrical redundancy)
be fire walled and separated. The Indian tribes are a great faith issue, need true protection that is owed them, and in my earnest
long time on the waters of the Pacific Coast with materials, are being used to generate typical dysfunctional leverage that we in fact all desire. (other than the removal of humanity off 30% of the United State land mass) or quote # 5 I suppose.

Herod, Megan K CIV (USA)

From: WRIGHT Deanna * DLCD <Deanna.WRIGHT@dlcd.oregon.gov>
Sent: Thursday, June 5, 2025 4:28 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Comments for Willamette Valley dams and hydropower

Hello,

I am Oregon's NFIP Coordinator at the State of Oregon. For my comment from the state I recommend for any proposed "development" (fill addition, fill removal, new structure, etc.) related to these activities that USACE reach out and work with the local floodplain administrator under their floodplain code to ensure that any proposed project or activity meets their local floodplain standards. Floodplain regulations and permitting is delegated to the local jurisdiction (city or county) in Oregon to implement their own floodplain regulations at the local level. I am available for technical assistance should that arise for local staff and others.

I am also tracking the federal ESA definition change to rescind "harm" from the "take" definition in the Federal Register. I wonder how that definition change would impact this and the other Oregon BiOp underway (since 2008) regarding floodplain regulations and FEMA.
Thank you for the opportunity to comment.

Deanna Wright, CFM
National Flood Insurance Program (NFIP) Coordinator
Pronouns: She/Her
Oregon Department of Land Conservation and Development | Planning Services Division
635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540
Cell: 971-718-7473 | Main: 503-373-0050
deanna.wright@dlcd.oregon.gov | www.oregon.gov/LCD

Herod, Megan K CIV (USA)

From: Sarah Dyrdahl <sdyrdahl@americanrivers.org>
Sent: Wednesday, June 4, 2025 12:21 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Melanie Klym
Subject: [Non-DoD Source] SEIS Comments

On behalf of American Rivers, I am submitting comments on the scoping phase of the supplemental environmental impact statement for the Willamette Valley dams. American Rivers works to make every river clean and healthy for people and wildlife.

We support the Interim Operations to restore volitional fish passage through the system and restoring natural river processes including the movement of wood, water, and sediment through the system. We appreciate the care that the Corps is taking to balance water quality protection and endangered species' recovery in the consideration of the deeper drawdown of Detroit Reservoir. We encourage the Corps to align the drawdowns with the needs of migratory fish after the initial sediment management drawdowns are completed. We recognize the need for individual operational plans at each dam and encourage the Corps to consider this during the alternatives analysis of non-hydropower options. We look forward to reviewing the draft Supplemental EIS for more details the non-hydropower and Detroit Reservoir drawdown analyses.

Please add us (syrdahl@americanrivers.org, mklym@americanrivers.org) to the distribution list for future notifications and public comment periods.

Sarah Dyrdahl
Northwest Region Director, American Rivers
Senior Advisor, American Rivers Action Fund
503-827-8648
AmericanRivers.org
AmericanRiversActionFund.org

Herod, Megan K CIV (USA)

From: Richard Duncan <rich@richduncanconstruction.com>
Sent: Monday, June 2, 2025 10:07 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] SEIS comment

U.S. Army Corps of Engineers
Attn CENWP-PM-F/Gail Saldana

The Detroit and Big Cliff Dams serve as a vital infrastructure asset dedicated to enhancing regional resilience and sustainable development through its dual-purpose function of flood control and hydroelectric power generation. As a flood control facility, it plays a critical role in safeguarding communities, agricultural lands, and infrastructure from the damaging impacts of seasonal and extreme flood events. By regulating river flow and storing excess water during periods of high rainfall, the dam minimizes flood risks, protects lives, and reduces economic losses. Oregon's economy for business is ranked 48th worst in the nation, we can't take any risk of further increases in our power bill, insurance, water quality.

In addition to its flood mitigation capabilities, the dam generates clean, renewable hydroelectric power, contributing to the region's energy needs and supporting sustainable development goals. This synergy between flood control and power production maximizes the dam's overall value, promoting environmental stewardship, economic stability, and community safety.

The Detroit and Big Cliff Dam system exemplifies a strategic investment in infrastructure that delivers tangible benefits: enhanced flood resilience, renewable energy generation, reduced reliance on fossil fuels, and improved quality of life for the communities it serves.

The risk reward for a study or experiment for an unknown outcome at and expense of over $600,000,000 should be criminal. The idea that if there is no measurable result found in the experiment that the study does irrevocable modifications to the Dam System that Hydro power cannot be restored. At a time when Cherriots bus system in Salem doesn't have enough power to recharge their buses so they have to supply 3 electric busses for each route to fill the position of one NW Natural Gas bus.

Richard E. Duncan, AIC, President
Rich Duncan Construction, Inc.
2295 Rural Ave SE, Salem OR 97302
Office 503-390-4999 Fax 503-390-3633 Cell 503-851-9804
www.richduncanconstruction.com

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Herod, Megan K CIV (USA)

From: DJ Heffernan <djheff1@gmail.com>
Sent: Thursday, May 29, 2025 9:33 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Comments related the Supplemental EIS

To whom it may concern:

I am writing to express my support for the proposal to eliminate hydropower operations on Willamette System Dams. The power produced by the dams can be more economically provided by alternative wind and solar generation facilities given the cost to retrofit the dams for fish passage. The transmission lines currently serving the dams should be repurposed to connect other renewable power sources within these transmission corridors to the grid. Dam operations should be revised to continue providing winter flood control with "run of the river" pool elevation maintained at other times.

Additionally, I support the proposal for a deep drawdown of the Detroit reservoir pool in 2026 to assess how operations can be modified to allow for more natural river conditions behind the dam outside of flood control holding events. The analysis should also assess structural modifications to the Big Cliff and Detroit dams to allow fish passage without having to rely on a trap and haul solution.

Thank you for considering my comments.

--
Daniel J Heffernan
(503) 310-2306

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Herod, Megan K CIV (USA)

From: Edwin Fox <erf.fox36@yahoo.com>
Sent: Wednesday, May 28, 2025 4:48 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Stop messing with Dams

Dear sirs,

This is an Important Dam. Don't Mess with it. Leave it alone.

Ed Fox
500 W Airport Rd
Lebanon, OR
97355

Herod, Megan K CIV (USA)

From: lmgb@earthlink.net
Sent: Wednesday, May 28, 2025 3:03 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Deep Draw Down --Detroit Lake

I think the deep draw down of Detroit Lake scheduled for fall of 2026 is still a dangerous undertaking for Stayton, Sublimity, Salem and surrounding communities. I understand the environmental issue of saving Salmon but Salmon use other rivers and tributaries to spawn. With global warming—oceans and rivers warm and potentially over time, salmon may not be able to survive even with draw downs. Human beings need clean water for drinking and cooking. I just think people in these communities should take precedence over fish. Thank you.

Lora Meisner
1347 Spyglass Court SE
Salem, OR 97306
503-588-6924

Herod, Megan K CIV (USA)

From: Karla Camara <kkaror6@gmail.com>
Sent: Wednesday, May 28, 2025 1:23 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake drawdown!!

When you had a Drawdown of Green Peter Reservoir in 2023, you created MAJOR ISSUES
with everything including towns downstream from this!!! Including THE LOSS OF KOKANEE SALMON!!!
There was a MAJOR IMPACT ON DRINKING WATER DOWNSTREAM!!!!!
******NOBODY WAS A WINNER IN THIS FIASCO!!!! ** INCLUDING THE SALMON!!!!********
~~~Now you want to do the same with Detroit Dam and the Santiam River??????????

You do realize that the water I drink at my house in Salem Oregon, comes from this river,
just downstream????? ** Salem is the CAPITAL OF OREGON in case you didn't know!!!
We get our water downstream from Detroit Dam!!!!
******WHAT are we supposed to drink when the water is NOT DRINKABLE????????******
The town of Detroit is just getting back from the fires that almost destroyed it!!!!**
******NOW, YOU WANT TO KICK IT AGAIN WHILE IT'S STILL DOWN????*****

~~~~~~~ I love fishing and Detroit Lake is my favorite place!!!! ~~~~~~~~~
~~~~~~~~~~ Please don't destroy our lake!!!!! ~~~~~~~~~

A very worried Oregonian,
Karla Camara
~~~~~~~~~~

Herod, Megan K CIV (USA)

From: Dburlison <dburlison@aol.com>
Sent: Wednesday, May 28, 2025 9:15 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] comment on Detroit Lake draw down

My comment on Detroit Lake Reservoir draw down --- The draw down will effect the drinking water for over 200,000 people, and kill fish. Look what happened to Green Peter Reservoir draw down, not only did they kill thousands of fish that we pay for, they caused the residents of Sweet Home, Oregon to drink muddy water, then they over chlorinated it and the people had to drink that crap. Some Judge approved these draw downs and he didn't think about or he doesn't care about the residents that are affected by these draw downs. If the environmental groups and the Indian Tribes want bigger Salmon runs, they should be able to work with everybody involved, we all want more Salmon. My suggestion to have bigger salmon runs. We need to eliminate all gill netting on the Columbia River, we need to have meetings with U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and maybe the Marine Mammal Commission and discuss the Marine Mammal Protection Act. We need to start harvesting seals in the Columbia River, start with a 100 seals. Sell harvest tags for maybe around a $100 and put that money towards the hatcheries. They eat a lot of salmon in the river. Years ago seals were tagged at one of the dams and shipped to southern Oregon and made it back to the dam in three days where they eat a lot of salmon. Seal meat if prepared right, is quite tasty. One other suggestion would be to have more bass fishing tournaments in the rivers, the bass are eating a lot of the salmon smolts. It makes more common sense to fix the root cause first--eliminate gill netting and harvest a bunch of seals before you draw down the reservoir. Dale Burlison Jefferson, Oregon

Herod, Megan K CIV (USA)

From: jim yarbrough <jyarbro2003@yahoo.com>
Sent: Saturday, May 24, 2025 10:03 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Willamette Valley dam system, Detroit Reservoir

I support deep drawdowns to recover wild spring Chinook salmon and winter steelhead. These drawdowns should minimize impacts to local communities. Such drawdowns, and operations to accomplish them, should improve water flows and quality, and fish passage.

I also support removing hydropower from this system.

Jim Yarbrough Newbury Park, CA 91320

Herod, Megan K CIV (USA)

From: Robert Powell <bbrocketb@bctonline.com>
Sent: Saturday, May 24, 2025 7:07 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Robert Powell
Subject: [Non-DoD Source] Detroit Lake Deep Drawdown // Not a value at half a solution //

Good Day

After reading and research concerning the issue of the drawdown (deep), as a Retired Federal analyst beginning in 1966,

in fact the the necessity of the (deep) part of deep drawdown is patently “O”. As Federal, redundancy is national necessity in

protection of humans, verse Sir Julian Huxley, Rockefeller, Forman, Maurice Strong and others, who are humanist, the obsession

that (Species over mankind) is a value. Stewardship is the value in all species.

This position comes from years of OJT work, some as Coast Guard operating from San Francisco to

Adak Alaska, and investigation and identifying various intrusions into the proper placement of Humanity as stewards

of the Globe. This within the United States and other.

The position being taken, is illegitimate and a calculation in fear porn against the citizenry. An example, to illustrate:

the preverbal ham sandwich is Ham, mayonnaise (or whatever) and two slices of some bread etc. Making a

sandwich with one slice of bread, is not called a sandwich - the premise of sandwich making is precise - any less

is flawed, either by ignorance or by political deception.

Son fact, political deception and military deception are twins in the use of deceit to arrive at their objective. Their

used to be a minor difference, no longer.

As Chamber Board Director of Oregon City, West Linn and Gladstone the Corp. of Engineers disgraced themselves as

part of the fisheries support. With current information and 13 + years of manipulation, with the State, and others, the

locks have not supported the fisheries at all. None of this needed to happen. Now the idea that the Corp. is supporting

the eventual Dam removal, with no physical redundancy is ludicrous. Using the Tribes and the challenges of the fish, are

the deception of the idea as a one sided ham sandwich.

I will be in Detroit to the meeting on the 28th, with documents, and this is not a discourse on the citizenry having voice,

I have no lack of understanding of the tribal issues. My ancestors are made up of both United Empire Loyalists, American rebels

and that is the point of reference. I honor the tribes, and at the same time, using them, is an unforgivable disgrace.

With respect, stop the waste of funds, fear porn, scaring the populous to attempt, shame and guilt.

With all respect.

Lt Robert K. Powell GDO (Ret) HFCA
United States Coast Guard
Oregon City, Oregon

Herod, Megan K CIV (USA)

From: Lisa Beaty <mlgandc@hotmail.com>
Sent: Saturday, May 24, 2025 12:01 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Hydropower production

I see that the ACE is requesting feedback regarding ending the use of hydropower. This is one of the crazier things someone has thought of in recent memory. The nation's demand for 'clean' energy is growing by leaps and bounds, and we're considering taking down functioning systems that support large areas of the U.S.? The use of wind and solar power have not come close to providing a reliable source of power yet, and have also presented problems of their own, with large amounts of waste being created by broken wind turbines, solar panels and lithium batteries.

Beyond the benefits of hydropower, the need for stored water will never end in our society, as it currently functions. The need for flood control, irrigation and general water supply are only growing. I don't believe that the general population understands the full ramifications of removing dams, despite their apparent ability to have sympathy for migrating fish.

Certainly dams have a lifespan. And hopefully the Corps is considering and researching alternative methods to fill current needs if a dam is no longer functional or repairable. Micro hydropower is an interesting idea, but at this time cannot fill even a percentage of current need. Until there is a usable plan in place, removing hydropower will drive up costs for families already stressed by the cost of getting by, send agricultural lands into a tailspin, and threaten the water supply of major metropolitan areas.. The removal of useful dams seems ill thought out.

Some groups are concerned about environmental changes to rivers caused by dams. However, most of the large dams currently in place have been functioning longer than 50 years, and most of their surrounding ecosystems have adapted. To pretend that any free flowing river's course is unchanging over time is to ignore the history and geology of the large rivers. Accommodations made for fish and wildlife using the river probably haven't completely ameliorated this problem, but it's steps in the right direction. To pretend that our growing population can or will leave no ecological footprint is a utopian fantasy.

Lisa Beaty

Herod, Megan K CIV (USA)

From: Mark Cosby <msc_woodturning@yahoo.com>
Sent: Saturday, May 24, 2025 9:14 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Dam draw downs

Army Corps of Engineers.

For 70 yrs fish have been trucked around dams and flushed over the dams when the small fish migrate to the ocean. (these fish live a maximum of 5 yrs). least that is what I hear.

Small fish swim in top 10 ft of water... we have fish horns in a few of the dams.
70 yrs and we haven't invented a fish ladder to let salmon migrate over the dams ? (looks like a lack of engineering).

Historically I think fish runs have suffered ill conceived ideas at the hands of ODF&W (some people know this personally).

And to think in the 70's we were forcing loggers to drag wood out of streams denying fish spawning ground.
DDT and other chemical pollutants always seem to find themselves to our waters.

As I watch the lies of "wildfire" and "Climate Change" while 80+ % of wildfire is human caused... so says State Fire Marshall. NFS personnel admitted they are sanitation burning our forests.
Today the spawning beds of many rivers suffer exposure to direct sun and water temps are to high for fish to survive. BUT HEY, DAMN THE DAMS ENGINEERS HAVE HAD 70 YRS TO FIGURE THIS OUT.

Judges seem incompetent ! There failures exposed for all to see.

I have to ask.... Are we saving Salmon or are we purging invasive species from rivers and dams are the scape goat ?

If silt is a fish killer... it makes no sense to drain reservoirs flushing mega tons of silt down the rivers to cover the food fish need. Utopic thinkin...polluting a environment for a threatened fish.

If a dam is anything it creates a settling pond for silt, heavy metals and what ever else happens in nature we want to villainize. Dams give us water supplies to fight "wildfires" when in the hottest times of year.
Dams provide clean energy at a time when we are taxing our electric grid.

Mark

Herod, Megan K CIV (USA)

From: Robert Havas <rahavas@gmail.com>
Sent: Saturday, May 24, 2025 7:56 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Drawdowns

I am opposed to all hydro-dam drawdowns. In this time of energy cost and much needed usage, I believe we can and will find better ways to help the salmon and humans together. Please do not draw down lakes anymore.

Herod, Megan K CIV (USA)

From: Marcus, Emma S <emma_marcus@partner.nps.gov>
Sent: Friday, May 23, 2025 3:04 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Operation and Maintenance of the Willamette Valley System, EIS - Notice of Intent to Prepare

Hello,
I am with the National Parks Service and coordinate our response to environmental reviews. In regards to the Notice of Intent To Prepare a Supplemental Environmental Impact Statement for the Operation and Maintenance of the Willamette Valley System, we do not have official comment at this time, however, I have received the request to share, “The Willamette National Forest received Land and Water Conservation funds. Please contact Richard Pringle (503) 808-2468 richard.pringle@usda.gov if this project will have any negative effects to public outdoor recreation.” Please reach out to me with any questions.
Thank you,
Emma

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Emma Marcus
Scientists in Parks Intern
Joshua Tree National Park
emma_marcus@partner.nps.gov
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Herod, Megan K CIV (USA)

From: papamikem@icloud.com
Sent: Friday, May 23, 2025 1:02 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Drawdown

Hello.

I am writing in opposition to the drawdown. As a resident of Lebanon, we experienced the Green Peter drawdown consequences firsthand. The horrendous water quality, loss of so many fish, loss of recreational use and subsequent loss of business to our area. Please reconsider and cancel or significantly modify this plan.

Respectfully,

Richard Mays
Lebanon OR
Sent from my iPad

Herod, Megan K CIV (USA)

From: Joseph Holt <jholt97355@gmail.com>
Sent: Friday, May 23, 2025 10:34 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit dam draw down. Opposed

Hello, I appreciate your work in keeping Oregon powered, green, and sustainable. My name is Joseph Holt and I live in Lebanon Oregon. I experienced the draw downs' effect on Green Peter Dam and I strongly oppose this dam's draw down and others for the same purpose. The effects on local drinking water, recreation, and other local fish populations is all very negative. There were a large multitude of fish dead on the shores of Foster Lake and Green Peter after the draw downs. Drinking water was tainted for weeks and local authorities had to implement excessive filtering at an enormous cost to the local agencies. Lake recreation was practically closed that entire season, cause local businesses to be severely hard hit.
Please, please! Don't draw down these dams.
Blessings
Joseph Holt
Lebanon Oregon

Sent from Yahoo Mail for iPhone

Herod, Megan K CIV (USA)

From: mbrinkle@comcast.net
Sent: Friday, May 23, 2025 7:37 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Discontinue power at Willamette Dams

I urge you, the Army Corp Of Engineers to discontinue power production at the Willamette Dams where possible. The cost of generating electricity from these dams is not cost effective, the operation of the turbines harms migrating endangered anadromous fish and the electricity can be supplied from other renewable sources. This is an easy decision and would improve the viability of our fisheries.

Mike Brinkley
Eugene Oregon

Herod, Megan K CIV (USA)

From: cnd Tedder <cndtedder@outlook.com>
Sent: Thursday, May 22, 2025 4:01 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit dam

We need the hydropower which is a renewable resource most years, and the drawdown will negatively impact the recreation in the area! I understand wanting to save fish but we need to think of the long term energy needs of the area.

Sincerely,
Dawn Tedder
809 Goucher St.
P. O. Box 752
Amity, OR 97101

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Herod, Megan K CIV (USA)

From: KAREN R HEUBERGER <ejkroheub@comcast.net>
Sent: Tuesday, May 20, 2025 4:58 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Comment regarding Detroit Lake "deep drawdown"

The following is my comment, during the public comment period, regarding Detroit Lake and the proposed "deep drawdown":

Please DO NOT drawdown Detroit Lake negatively impacting the water supply for human populations downstream in Stayton, and Salem. This deep "drawdown" would potentially leave Stayton and Salem without water---for weeks or months. Since every government project ultimately is overbudget and delayed from the original time estimates, it could be a year or more. Without water! An untenable situation. Filtration systems do not exist to deal with muddy water for an extended period of time; which would be the case with the proposed "deep drawdown".

I understand the desire to protect salmon. However, dams are considered the "culprit" per salmon populations. Common sense requires acknowledging that the overpopulation of seals and sea lions during recent decades has resulted in salmon population decline. Please use logic and work on resolving the overpopulation of those predators. The environmental and economic impact of the "deep drawdown" would be disastrous.

A "win-win" per seals and sea lions would be to allow hunters to harvest them, and then use the protein for feeding our incarcerated populations. The Native Americans ate them. And we admire things the Native American did. So a "win-win" solution. Solving the predator issue and feeding humans.

I appreciate your consideration in this matter.

Thank you,

K. R. Heuberger
ejkroheub@comcast.net
P.O. Box 724
Salem, OR 97308

Herod, Megan K CIV (USA)

From: Vickey West <vickeypat@yahoo.com>
Sent: Tuesday, May 20, 2025 11:18 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Draw down Of Detroit Lake, Oregon

My name is Vickey West, I live in Salem Oregon. I realize that there is a law protecting endangered species, but when does human suffering fall behind Fish? The core of engineers has already had a bad experience with the small towns of Lebanon and Sweet Home, Oregon, drinking mud, and ruining water treatment plants, and people's wells going dry over the draw down that affected them. Now we are talking about hundreds of thousands of people being affected, is anyone talking to the US legislature about changing rules when it affects so, so many people? Lastly, if this is such a huge issue with saving the salmon, then there should be millions and millions of dollars given to the cities that are affected, so that they have the funds to prepare for their water systems to be able to handle the mud that will be caused by this draw down.

Sent from Yahoo Mail for iPhone

Herod, Megan K CIV (USA)

From: Russ Lawrence <russ@streamfix.com>
Sent: Tuesday, May 20, 2025 9:30 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Reservoir Proposed Deep Draw down

This SEIS appears to be required in response to a Biological Opinion from NMFS. The ultimate goal is alleged to be improving survivability of endangered species (Chinook Salmon). Without an opportunity to review the Biological Opinion, a meaningful response is difficult to be made. That said, several observations of the results of similar actions should be considered.

A similar action was made on the Green Peter reservoir to support/enhance survivability of Chinook Salmon in the South Fork of the Santiam River system. The results were spectacular to say the least. Unfortunately, not in a positive direction. Less than 2% return (10% projected), substantial loss of fish to barotrauma, downstream redds buried in silt, Significant damage to downstream public/community water systems, the list goes on.

In order to garner meaningful commentary on plans to prevent such negative fishery and associated environmental impacts from the proposed Detroit reservoir draw down, a more detailed plan of the draw down needs to be published. That plan needs to clearly discuss how the proposed drawdown will positively benefit the subject Chinook population? Perhaps there will be greater escapement of the fish in the reservoir, but how will this benefit the overall fishery? How will returning fish be able to access the spawning reaches above not only Detroit dam, but Big Cliff, immediately downstream?? There are no fish ladders, or other means, for the fish to bypass either of these structures when (if) they return to spawn.

What impact, if any, will this deep draw down have on the super fund sight immediately down stream of Detroit Dam (in the Big Cliff Reservoir)? This river is, after all, the water supply for the City of Salem and other communities.

While the courts have ordered actions to be taken to rectify the negative fishery impacts of the dams in the Willamette River system. The Corps has yet to develop an effective means for meeting that requirement. Deep draw downs are essentially experiments to discover what may, or may not, work. The least expensive, and so far least successful, to date.

While these two dams (Detroit & Big Cliff) have removed hundreds of miles of spawning and rearing habitat for the targeted endangered fish species, the proposed deep draw down does not appear to be an effective methodology to restore access thereto. If that cannot be the outcome, why proceed?

Russell A. Lawrence
Fluvial Geomorphologist, P.E.
19478 S. Starview Ln.
Oregon City, OR 97045

Herod, Megan K CIV (USA)

From: Samuel Standafer <sam.standafer@gmail.com>
Sent: Tuesday, May 20, 2025 4:40 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Hydropower Reduction Comments

I don't believe we should be reducing our hydropower capacity before we have a power source equal to or greater than ready to replace it. Our cities are only going to get bigger and will require more and more power. Battery capacities are not capable enough yet for solar and wind to sustain power demands. Build nuclear power plants first.

Herod, Megan K CIV (USA)

From: Janice Thorpe <janruth2010@hotmail.com>
Sent: Monday, May 19, 2025 7:38 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source]

Not worth the risk and disruption. The fires traumatized and rendered the area off limits for a long time after.
Is the project for the greater good? Thinking of the campers, boaters, swimmers, residents and the risk to our water source, seems like time and money could be spent on a more urgent project.
Thank You,

Janice Thorpe
Get Outlook for Android

Herod, Megan K CIV (USA)

From: smac83@comcast.net
Sent: Monday, May 19, 2025 3:28 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Draw down

Attention to those who think Fish are more important then People!

Why are you trying to eliminate the most important element to man ----WATER!

You can not control the climate... so there is no way of knowing if the lake will be able to restore itself with precious snowpack and rainfall. I just don't understand why you would consider this action at all?????
You would also destroy the livelihood of those who live in that area - its almost like being destroyed all over again with wildfires! Plus it is the water source of the people of all the cities and towns below Detroit and thats roughly 250,000 plus people.

We have fish hatcheries to keep endangered species going and that's what they are for we don't need a desperate attempt to save a fish at the cost of our people!

Right NOW need more water saved for the future growth and climate matters.....
if you want something to do Build Another Reservoir - and keep our cities and counties sustainable with the water we have now!!!

A Salem Resident who loves Detroit Lake,

Mary Campbell

Herod, Megan K CIV (USA)

From: RAY LANCASTER <rjscuda@msn.com>
Sent: Monday, May 19, 2025 2:52 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Draw Down

It will be painful, someone that will steal the wagon in the lake, the draw down will destroy the Kokanee fishing just like it did at Green Peter and when Salem is forced to pump ground water for drinking all of us that live near Salem may lose our well water when the ground water level drops, who will provide water for us? Power cost will rise higher and senior's can't afford power now.

Please don't draw down Detroit Lake, Ray Lancaster

Herod, Megan K CIV (USA)

From: Jeff Shultz <jeffshultz@gmail.com>
Sent: Monday, May 19, 2025 2:31 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit/Big Cliff Dams

Everyone is talking about the deep drawdown (now delayed until at least fall 2026) at Detroit. I assume the water level behind Big Cliff Dam would have to be drawn down similarly, although nobody seems to be mentioning this.

Why has there been little to no discussion of installing fish ladders on the dams? I remember hearing someone say, "it's too tall" - that just means that someone has a lack of imagination. If the Romans could build aqueducts that spanned tens of miles or more, and salmon can jump up Willamette Falls, we can build a path that the salmon can manage to get up - and down - through and around the dams. Perhaps it could zig-zag up the faces of the dam (sufficiently protected against or distant from the outflow from the spillways), maybe it needs to be a long ramp beginning downstream of Big Cliff up to whatever is the best level on Detroit. Leave the actual design up to the structural and civil engineers, that's their job.

Yes, it will be expensive. Retrofitting stuff that should have been in the original plans always is. But is it really going to be less expensive than the side-effects of the deep drawdown and (especially) the long term potential loss of revenue from electrical generation and the cost of replacing those watts with something else?

I've not seen a recreational area created by a windmill or a solar panel farm yet.

--
Jeff Shultz

Herod, Megan K CIV (USA)

From: Jack Galbraith <jack.galbraith2@gmail.com>
Sent: Monday, May 19, 2025 11:39 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source]

Do not spoil what we now have. Leave Detroit lake alone and as is. Jack Galbraith
8915 s.w. Commercial # 13 Tigard, Or. 97223

Herod, Megan K CIV (USA)

From: Dennis Soe Nyun <dsoenyun@gmail.com>
Sent: Monday, May 19, 2025 10:06 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake

Please consider not to draw down this lake. Let's use technology and re-route the fish or help them thrive in other bodies of water. This city relies heavily on tourism and not fully recovered and thrive from the devastating fires and droughts over the years. Yes the species are important but the economy to help these towns serve natural beauty, peaceful and healthy environments for families is a priority. Use tech to help the fish to survive.

Thank you,
Dennis SoeNyun

Herod, Megan K CIV (USA)

From: Scott Sinn <sinnscott@yahoo.com>
Sent: Monday, May 19, 2025 10:02 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] opposition to deep draw down

As a citizen of Salem, OR I strongly oppose a deep draw down of Detroit lake at any time.
I don't believe it is right to endanger the drinking water of the citizens of Salem.
I have 4 young children and their health would be very negatively affected if our drinking water was contaminated as it was
when you did this draw down in Sweet Home. These deep drawdowns are recklessly gambling with people's health and livelihood and I
urge you not to do this.
Sincerely,
Scott Sinn

Herod, Megan K CIV (USA)

From: Joe <nyjoepers@gmail.com>
Sent: Sunday, May 18, 2025 11:12 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Shooting ourselves in the foot

Hydropower is critical to the region. It is one of the cleanest sources of energy we have. It keeps our costs down. My understanding after talking to local fisherman is many fish will be killed during the draw down and downstream water systems in other locations were damaged by the release of silt from the river bottoms.

All this means more costs to the towns that depend on the clean power and clean water. We are paying enough in taxes as it is and that should include these critical services.

What's wrong with the current methods of restocking the lake and farming methods to replenish the fish. I buy my salmon marinated and frozen with a citrus rub and it's delicious and it comes from a farm.

Haven't we learned our lesson from the spotted owl debacle. Species will be eliminated, it is part of the normal cycle of nature. If the Chinook is that critical, then we should set up more farms and find ways to create habitat downstream from the critical dams, which I also understand happens already.

Just don't shoot ourselves in the foot by making it unaffordable to live here with the same quality of life we've had till now.

Herod, Megan K CIV (USA)

From: Paul Lebold <pjharley1958@gmail.com>
Sent: Sunday, May 18, 2025 8:02 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source]

This is worst way possible to help those fish the people put those dams and reservoirs there to stop flooding and so we could support the families living here in so many ways.
Help the fish with hatcheries all of us would support that. We don't won't you lowering levels of are impoundment or removing dams . We need flood control and power that dams produce .
I've lived here my whole live saw what it was like before we got control of the winter high waters brought and destruction the floods coused not to sat how human lives where affected or lost.
I say no . Help fish but remember human lives also count.

Herod, Megan K CIV (USA)

From: Alex Grandstaff <alexvgrandstaff@gmail.com>
Sent: Sunday, May 18, 2025 7:59 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Drawdowns

STOP! By continuing the practice of drawing down reservoirs in western Oregon, and the Santiam in particular, you are ruining the established water delivery system for hundreds of thousands of people.

The core of engineers is also speaking to the idea of elimination of hydro-electric power from the dams in question. STOP! We here in Oregon enjoy our power production clean and renewable. Need I actually expand on that?

My grandfather worked as an electrician for the army core of engineers for 55 years. In his career he oversaw the power houses at Detroit, Big Cliff, Foster, and Green Peter. He was a proud man and a patriot. He helped bring electrification and flood control to the rural areas of this state. Clean, reliable energy.

If there is a problem with Salmon, create some jobs, open the hatchery system back up. So many are closed and serve as little more than unguided tourist stops. Build a fish ladder, they work. QUITE BLAMING OUR SOURCE OF ENERGY, DRINKING WATER, AND SAFETY FROM SEASONAL FLOODING ON DECLINING FISH POPULATION. It is ridiculous!

Don't think so? Go take a look at thousands of dead kokanee and rainbow trout after a reservoir has been drained leaving them beached. Not to mention, no water sports (boating, kayaking, swimming,) These activities effect camping, fishing, and general outdoor activities. And also local economy reliant on the patronage of all of us who enjoy our great state of Oregon and it's amazing recreational opportunities.

What I'm asking for is; use your head when considering deep draw downs or elimination of hydro power. If the salmon population is in decline, blaming the reservoir and power production makes about as much sense as blaming the R.V. industry for transients and homelessness.

Taking away clean potable water, reliable hydro carbon free energy, and community safety from uncontrollable flooding is not only unimaginable, it is flat out stupid.

My grandfather and father both took me to Detroit and Foster as a child and young man to swim and fish and laze a sunny summer weekend away more times than I can count. I learned from Grandpa about how it all worked, what it meant, what it provided, and what had to be done to install these magalithic projects. A thing I may never eat to share with my son if the nonsense continues.

PLEASE CEASE AND DESIST WITH THE SCHEDULED DRAW DOWNS OF THE SANTIAM RIVER DAM SYSTEM.

AND FOR THE LOVE OF CHRIST, AND ALL THAT IS SENSICAL, DO NOT CONSIDER THE REMOVAL OF HYDRO-ELECTRIC POWER PRODUCTION IN ANY CAPACITY.

Thank you for the consideration and opportunity to be heard as a 7th generation Oregonian. - Alex Grandstaff, age 43, Corvallis Oregon.

Herod, Megan K CIV (USA)

From: Gary Hamm <whitebirdwoods@gmail.com>
Sent: Sunday, May 18, 2025 6:41 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Drawdown of Detroit reservoir

The planned drawdown of Detroit reservoir this coming year in response to what I understand is a court ordered requirement, is a terrible choice by the corps of engineers.

The fact that this method is not an effective one can be shown by looking at how many (or the lack of) smolt and migrating Salmon passed over Green Peter a year ago when this method was tried. The number was very low (less than 10,000 by all accounts) and simply not worth the hundreds of thousands of Kokanee and Trout that were destroyed.

Additionally, the cost to the small towns and communities in the path of this horrible idea will be immeasurable, and will go on for many years. Water systems, businesses, and homeowners will be devastated. Lawsuits will follow (just like Green Peter). The corps of engineers will spend endless monies (taxpayer dollars btw) for a nothing burger.

It's my understanding that at Swift reservoir Pacific Power worked
with several tribes in Washington state and rather than a drawdown, an investment was made in a kind of fish trap. This trap attracts migrating salmon and steelhead where they are corralled and hauled down stream.

Further, I have been told the cost of the trap was comparable to the lawsuits currently winding their way through the courts as aftermath to the Green Peter fiasco. These lawsuits will go on for many years.

The trap used on Swift will be re used year after year. It is extremely effective and does no damage to Swift, Merwin and Yale reservoirs. I suggest this and probably other options are possible.

Killing fish to save fish just doesn't make sense. There is another way. Look harder. Study the problem. Make a better choice.

Gary L Hamm
White Bird Woods
p 503 448 2550
f 503 448 2551
whitebirdwoods.com

Herod, Megan K CIV (USA)

From: joe mizner <joemizner@gmail.com>
Sent: Sunday, May 18, 2025 5:41 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] I support Detroit drawdown!

My Familys cabin across from Kenny Creek was flooded when this was built but the sediment build up is a much bigger problem and will take out the dam if not resolved. Local family in support of the drawdown and clean that crap out! Attached photo

is my father fishing before the lake was built

Herod, Megan K CIV (USA)

From: Phillip Smith <fishphill@gmail.com>
Sent: Sunday, May 18, 2025 4:07 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit drawdown

I'm totally against the Detroit drawdown. It will kill millions of fish. Not only in the lake but the native fish in the river.

Did you not learn anything from the green Peter drawdown? Millions of dollars, killed a million Kokanee and other fish. All to save 6 smolts that at 1% return rate will never make it back. Not to mention these fish were most likely the result from stray native fish already. Probably killed more native eggs down river than any even would hope to save above the lake due to the turbidity. Whoever the biologist is they should stop acting on emotions and use their head.

Aside from the fish what about the sweet home treatment plant and all the money they are having to spend. You expect fish to survive but a filter won't even handle it at a treatment plant!
Salem would probably go broke treating water.

This drawdown is a waste of money and does more harm than it could ever do good.

Phillip Smith

Herod, Megan K CIV (USA)

From: peter eschbach <pandjeschbach@gmail.com>
Sent: Sunday, May 18, 2025 3:49 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Comments on Detroit drawdown

Honorable mention and women of the Corp

While well intentioned the drawdown at Green Peter was a case study. It brought to light every nightmare scenario: Kokanee Salmon kill off, massive sediment in drinking water and from what I understand, very few Chinook or Coho returned upstream of Green Peter. Let's not repeat that at Detroit reservoir.

I am a lifetime Northwest fisherman of over 50 years. I grew up on the banks of the Columbia in the lower Hanford reach and in the late 60's and early nineteen seventies I used to walk the banks and find salmon carcass every 50 feet in late September into late October. This was after Bonneville, The Dallas Dam, and McNary! Fish ladders work . I believe lowering all three dams at Green Peter, Lookout point and Detroit and putting in fish ladders is the best long term solution. These drastic drawdowns, catching fish in traps and hauling them over the dams just is not effective and the environmental impact to Kokanee, Bass, Perch, and the Chinook that live in those behind dam pools is just too high!

In addition to being ineffective, these deep drawdowns have huge economic impacts to the communities that benefit from Kokanee fishing in the dam pools. Personally we bought a $65,000 boat from a from a local marine dealer in 2022 so we could better fish Green Peter. That lasted 1 year. Then we were forced to drive up to Detroit and have really enjoyed that fishery. In 2024 we stayed at a VRBO rental in Detroit Lake , spent money in the local economy and enjoyed ourselves immensely. Please don't take that away as well. I expect that we alone spent $2000 at Detroit in 2024 in rentals, food, restaurants, supplies. It was money that economy needs as they were literally rebuilding from the terrible 2020 fires as we were there. I e seen an estimate from a Kokanee fishers group that Kokanee fisherman bring in $15M per year to the Detroit area. When you consider a modest multiplier of 3x, I believe that impact is more like $45M.

Please consider the whole picture when deciding on this drawdown and not just the needs or wants of the few or one.

Thanks

Peter A Eschbach
Corvallis, OR

Herod, Megan K CIV (USA)

From: Max C Hoefer <mxfctr@me.com>
Sent: Sunday, May 18, 2025 2:46 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Drawdown.

Please do not waste time and money drawing Detroit reservoir down. The fish are gone. We have exterminated them. Horrible example drawing Green Peter down. Do not repeat same mistake with Detroit.

Max Hoefer

Sent from my iPad

Herod, Megan K CIV (USA)

From: Roger Bell <rbofrbjb52@comcast.net>
Sent: Sunday, May 18, 2025 2:41 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: rep.eddiehl@oregonlegislature.gov; sen.fredgirod@oregonlegislature.gov; dgwyn@cityofsalem.net; jhoy@cityofsalem.net
Subject: [Non-DoD Source] Detroit Lake drawdown and hydropower removal

I know that there are special interest groups that drive issues all over the state that have no impact on them. I believe that this is one of those issues. First off, water quality down river is not a negotiable issue, it's a simple matter of life - clean water is required for people to live a healthy life - that should be the end of the discussion. If these special interest groups are driven to "save the Chinook Salmon from extinction" they should first look at the entire habitat of the species, not just one area - the species is not going extinct. On a side note regarding Chinook Salmon, per the Oregon Department of Fish and Wildlife website "They require clean, well-oxygenated freshwater to spawn." If this operation is allowed to go forward I would have to question the clarity of the water for several years as the sediment flows downriver. If common sense is going to ignored, some basic questions should come up; what alternatives have been looked at (fish hatcheries, dam bypass for the fish, ???). I seem to remember an issue involving spotted owls that pretty much destroyed the Oregon timber industry only to find out that they are not limited to a specific nesting area - oops.

Second item, removing hydropower. This is just plain dumb. Hydropower, if managed and maintained, is as close to free and reliable power as we can get, especially here in Oregon. It also provides flood control - a win win.

Maybe the Corp of Engineers should ask for a reevaluation of the "biological opinion, issued in December 2024 by the National Marine Fisheries Service" with regard to the application of the Endangered Species Act in this specific case. I'll advocate for that as an Oregon resident who will be directly affected by this proposed plan.

I'm sure our Democrat members at the State and Federal levels are most likely on board with this, or at least silent about it (optics over common sense), but this is ridiculous. Whatever legal action that can be taken to stop this lunacy, should be taken. How about finding a common sense Federal Judge and have them put a stay on this whole thing until the "biological opinion" can be addressed and the full impact on people can be factored into any decision.

Roger Bell
Salem, Oregon
rbofrbjb52@comcast.net

Herod, Megan K CIV (USA)

From: J R <jxxxreese@gmail.com>
Sent: Sunday, May 18, 2025 12:48 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] CORRECTED MESSAGE that was prematurely sent

Hello,

I am one of many who believe this is absolutely wrong! We will likely be having one of the worst wildfire seasons this year, population in Salem keeps increasing rapidly, and actions that could affect water for public consumption and daily life are NOT a viable plan.

Of course we need to protect the salmon. But that has been an ongoing issue for a long time. By now, you should have come up with another solution. This is absolute negligence for not dealing with this problem and the WRONG solution at this time.

Fish Ladders
Fish ladders have been used since the 1800s to help provide a route for fish moving upstream. Fish are directed by flows of water, feature barriers, or nets into the fish ladder. From there, ladders contain a series of increasingly elevated “steps,” or pools filled with water, that fish are able to swim and leap up until they’ve moved past the facility. Fish ladders have seen multiple designs over the years, depending on the size of the hydropower facility, the river flow, the species of the fish affected, and the technology available at the time, but all are designed to help fish pass through dams and other structures and mitigate river connectivity issues.

Trap and Haul
It may be impractical to install a full fish ladder at certain dams. Instead, a trap-and-haul system can be used to help move fish upstream. Fish are directed to a location where they are trapped or gathered in pools or tanks and then transferred into specialized tankers or barges. The ships then release the fish into the river on the other side of the dam. Every trap-and-haul design is different depending on the facility.

Fish Lifts
Fish lifts are designed for fish to swim into a hopper or chamber that functions like an elevator. After a certain period of time or number of fish, the lift moves the fish like an elevator and releases them so they can continue on their way. Fish lifts tend to work well for large numbers of fish and multiple species of fish, including those that may be weaker swimmers.

You NEED to use another temporary solution until a permanent situation can be implemented! I suggest installing a fish tube immediately and if needed, start on a more permanent installation. Human lives are in danger!

Thank you,

Janet Reese

Links to numerous relevant articles:

https://www.smithsonianmag.com/smart-news/yes-salmon-cannon-funny-its-also-sorely-needed-conservation-tool-180972905/

https://ourplnt.com/salmon-cannon-fish-pass-over-dams/

https://www.nwriverpartners.org/education-resources/hydropower-essentials/salmon-recovery/

https://www.fisheries.noaa.gov/national/habitat-conservation/improving-fish-migration-hydropower-dams

https://www.hydro.org/powerhouse/article/fish-passage-technology-saved-a-salmon-run/
https://storymaps.arcgis.com/stories/d6f5144bc03b438395f34d793486b904

https://www.energy.gov/eere/water/articles/how-do-fish-survive-hydropower-dams

https://stateofsalmon.wa.gov/executive-summary/challenges/hydropower-and-dams/

Herod, Megan K CIV (USA)

From: J R <jxxxreese@gmail.com>
Sent: Sunday, May 18, 2025 12:37 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Water Drawdown

Hello,

I am one of many who believe this is absolutely wrong! We will likely be having one of the worst wildfire seasons this year, population in Salem keeps increasing rapidly, and actions that could affect water for public consumption and daily life are NOT a viable plan.

Of course we need to protect the salmon. But that has been an ongoing issue for a long time. By now, you should have come up with another solution. This is absolute negligence for not dealing with this problem and the WRONG

https://stateofsalmon.wa.gov/executive-summary/challenges/hydropower-and-dams/

https://storymaps.arcgis.com/stories/d6f5144bc03b438395f34d793486b904

Herod, Megan K CIV (USA)

From: Curtis Clifford <cbc75beaver@gmail.com>
Sent: Sunday, May 18, 2025 12:10 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source]

The draw down doesn't help the salmon when there are thousands of sea lions in the Columbia preventing their passage upstream!

Herod, Megan K CIV (USA)

From: Aleks Weir <alekswithak@gmail.com>
Sent: Sunday, May 18, 2025 11:34 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Public Comment

Rivers should be natural and not an extension of human destruction. Return the river to God's design. Also, I have family that rely on Salmon. Many communities need salmon to naturally migrate from Ocean to Creek.
-Aleks Weir of Gresham, OR

Herod, Megan K CIV (USA)

From: Rich S <chinook88@outlook.com>
Sent: Sunday, May 18, 2025 10:04 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Draw Down

I'll toss 2 cents in here for the good it will do. While I understand this is driven by a court order, at this point in the game it seems rather pointless. I have fished the Willamette for spring chinook above the falls going on 40 years. The fishing used to be great until around 2009ish. For many reasons I believe the catching tanked once the river flows seemed to be managed differently and the algae showed up. In the 90's and early 2000's there didn't seem like there was an issue with the spring chinook run. Sure, during that time there were some restrictions since none of the hatchery fish were marked, so we needed to get through that 5 or so years. More recently there have been large returns but the catching was nonexistent. While the run numbers go up and down, large releases from the upstream reservoirs do not hold a lot of value given the cost and issues created downstream.

As a user of Detroit Lake, I would hate to see the destruction of the Kokanee fishery. I used to fish Green Peter and that fishery is mostly a thing of the past. Why would we want to do that to Detroit? While I understand the Kokanee fishery is not natural, at what point is the economic impact to the area and surrounding communities taken into account.

Lastly, I feel for the downstream communities who get their drinking water from the Santiam. The havoc that will be released upon the water filter infrastructure is putting a huge burden on these communities. What mitigation can these communities expect? If any at all. It would make sense that it the COE is creating the massive downstream silt issue, then the COE should be responsible to mitigate the damage it has caused. Court order or not. In today's world there ought to be ways agencies like COE, NOAA, NIMFS, EPA, ODFW, and all of the others can negotiate some way around these issues that minimizes the impacts to communities and still have some benefits to the chinook.

Rich Spofford
2515 South Kings Valley Rd
Dallas OR 97338

Herod, Megan K CIV (USA)

From: regularguy <rockher1979@gmail.com>
Sent: Sunday, May 18, 2025 10:02 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] PEOPLE MATTER

Save the Chinook, save the wolves, save the whales,…how about save the homeless humans? Save the fresh water supply? Humans before animals!! Please put people first.

Herod, Megan K CIV (USA)

From: Phil Morgan <morgfam4@icloud.com>
Sent: Sunday, May 18, 2025 9:31 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit draw down 2026

I live in Lyons, Oregon, have lived here for 26 years. Even before that I have been going to Detroit Lake for years, can never get enough of it. This deep draw down seems like a very bad thing to do after what happened with the draw down at Green Peter reservoir, did we not learn anything from the effects of that draw down ? The community of Detroit and communities below the lake rely on this water system for our livability. To do this DEEP draw down is just irresponsible, I know that we need to help the fish survive, but there has to be another way other than damaging the communities that rely on this water supply. Be responsible, do the right thing ! Phil Morgan
Sent from my iPhone

Herod, Megan K CIV (USA)

From: Tom D <tomdieringer@gmail.com>
Sent: Sunday, May 18, 2025 9:04 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake & other lake drawdown

To whom it may concern,

I wanted to voice my disapproval of this plan to perform deep drawdown on western reservoirs. There are other ways to protect Spring Chinook. Please stop putting the desires of a few in front of the preferences of many. These lakes are important to drinkimg water, tourism and recreation and those needs must be put in front of the desire to help the fish.

It is time you return to people first policies.

Sincerely.
Tom Dieringer

Herod, Megan K CIV (USA)

From: Mark wigg <mark_wigg@hotmail.com>
Sent: Sunday, May 18, 2025 8:47 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] detroit drawdown

The experiment on the South Santiam reservoir drawdowns should be monitored to see if salmon benefit from the drawdown. I think the drawdown will not increase salmon in the South Santiam because the drawdowns cause tons of sediment to be washed onto spawning gravels below the dams. While some fish may benefit, the overall numbers of salmon in the South Santiam will decrease. After several more years of monitoring, the ACE may have enough information to justify proceeding or abandoning the drawdown practice. Please don't drawdown Detroit until you know the results of other drawdowns.

Mark Wigg
971-600-6607

Herod, Megan K CIV (USA)

From: Paul Luhrs <pluhrs71@gmail.com>
Sent: Sunday, May 18, 2025 8:09 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit reservoir draw down.

The draw downs of Green Peter reservoir have already shown that affects are detrimental to downstream communities due to the silt load in the river downstream of the dam. It also has a detrimental affect on native fish and wildlife that live in the river and in the riparian zones.

As for recreation. Detroit reservoir is used by many in the local area all the throughout the year. A deep drawdown will stop all recreational uses cause financial harm to the surrounding communities. And as well as people and communities downstream as far as Portland. As observed during the draw downs of Green Peter and Look Out Point.

Thank you.

Paul Luhrs

Albany OR.

Herod, Megan K CIV (USA)

From: Слава Брюнчугин <welcomecleaningco@gmail.com>
Sent: Sunday, May 18, 2025 7:30 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit lowest levels

During period warming of the planet, you need to keep levels in reservoirs to able use that water for firefighter, also not worth kill all konakees in lake to keep other salmon to live, salmon it good, but system already adopted. It can give big impact on stabilised already wildlife. Other impacts it local cities left without tourism and money. If system work already and not required immediately maintenance, better to don't touch it anymore. Unless you want unexpected problems in stable region

Herod, Megan K CIV (USA)

From: Ronald cox <roncox2009@gmail.com>
Sent: Sunday, May 18, 2025 6:52 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source]

If you do the draw down it will kill tens of thousands of fish already established in Detroit Reservoir. Just like Green peter a couple years ago. And not mention California drew down all the Reservoirs and then didn't have water to fight fires.hmmm..

Herod, Megan K CIV (USA)

From: Stephanie Duncan <dchoctaw22@aol.com>
Sent: Sunday, May 18, 2025 12:08 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Pro Detroit water deep drawdown

To whom it may concern-
My family, friends, and I have been going to Detroit Lake and surrounding areas since the 1980's. My Great-Grandmother had enjoyed the area and fished since before I was born.
I can say for certain that we would miss boating at Detroit Lake . However, we will still go fishing, camping, and hiking in the areas.
It seems shortsighted and self-serving to say that the Army Corps shouldn't try to help the native salmon come back.
Detroit Lake isn't the only draw to the area. Towns such as Detroit, Gates, and Mills City should work to drawn people with the many other types of outdoor attractions. Breitenbush, Northfork, Fishermen's Bend, birdwatching, hiking, nature tours...
As for the temporary muddy water issue down stream for Stayton and Salem. Those big cities should be making drinking water filters a priority. Those ever growing cities should step aside on this one. Oregon is known for and markets itself as being environmentally friendly and known for their great outdoors. Meanwhile Salem and Stayton seem to be ignoring the importance of green spaces and agriculture in favor of apartments and food truck parking lots.

All the best,
A family that supports and loves The Willamette National Forrest's

Sent from the all new AOL app for iOS

Herod, Megan K CIV (USA)

From: Monte Sauer <sauer.monte@yahoo.com>
Sent: Saturday, May 17, 2025 10:16 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake draw down

Why would we drain a lake to it's lowest levels to preserve Chinook Salmon? If Oregon's leaders actually put funding into our hatchery programs, to raise more Salmon. That would help our fish numbers grow each year. We don't need to drain a lake, to jeopardize our drinking water, hydro power, farmers crops irrigation if any comes from Detroit Lake. This is not a smart ethical idea. We now have at our disposal, a Fish Cannon. That can safely and efficiently get Chinook Salmon or any other migrating fish up and over any dam. Why don't we way our options on other ideas to save our fish, while we keep our water levels where they are. Reach out to me if you need me to come speak in person.

Monte Jr
Sauer.monte@yahoo.com
(541)223-3954

Herod, Megan K CIV (USA)

From: Leona Jeffers <leonajeffers28@gmail.com>
Sent: Saturday, May 17, 2025 7:43 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source]

Detroit dam draw down along with others would be a mistake I feel. Not only will it impact any water sports but it would greatly affect any fire fighting efforts should a fire start.

The huge fires up there were hampered a few yrs ago because they had nearly emptied the dam then. Water was an issue. Really concerns me that if we empty our lakes or water behind the dams then have a need for that water, that there will be none. Also have friends that live in the Yamhill river and they let all the water out of the damn above them in efforts to save last yrs fish runs and due to the sentiment behind the dam they did just the opposite and killed most of the fish they were trying to save. The river was a muddy mess for quite some time. Dead fish everywhere. Not good.

I know that we need to save the salmon and other species of fish. I do but at the same time drawing down our dams to nothing isn't the way to go. Above the green Peter dam there just wasn't any water even in the fall. We had to drive miles to even find any water to park next to. Can't imagine that any fish would have a place to spawn. There were spots where it was dry ground and no signs of water.

Have never understood the reason for the draw downs even to save the fish. Seems like a huge waste of all that water.

Herod, Megan K CIV (USA)

From: Sandi <nuthousemamma@aol.com>
Sent: Saturday, May 17, 2025 7:14 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake

When you make these decisions, please remember those of us who are affected by the release of water from the dam. So many times in the past, too much water was let out too fast and those of us in the valley have experienced flooding. I have no desire for my grandchildren to experience this. I would also like to receive updates, please.
Thank you for your time.
Sandra Polk

Herod, Megan K CIV (USA)

From: Jennifer Vahl <valhalla_j@yahoo.com>
Sent: Saturday, May 17, 2025 4:21 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Drawdown

Hello

Regarding the drawdown at Detroit Lake currently under public comment, I want to see the salmon prioritized and choices made to preserve their well-being. They are not only ecologically significant but a major part of the culture and heart of Oregon. If we don't start prioritizing them over recreation, fishing, and tourism (which can all be done on other waterways) we will kill off one of the classic features of Oregon. Please continue with plans that will give them the best chance of survival.

Thank you,
Jennifer V.

Yahoo Mail: Search, Organize, Conquer

Herod, Megan K CIV (USA)

From: Mollie Hotchkiss <kitty6lover@gmail.com>
Sent: Saturday, May 17, 2025 4:19 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] draining of Detroit lake

Hello, I live in Lebanon Oregon. You guys drained green peter dam. By doing that you have changed the fishing for the worst in the santiam river. You have also ruined our drinking water. I can't give water from the tap to our pets because the city has so much chlorine in the water to counter act what you have done. You are not only hurting all of us, you are also hurting the other wildlife for salmon.
Leave things alone and quit playing god.

Mollie

Herod, Megan K CIV (USA)

From: Frances Thomas <francesreidthomas@outlook.com>
Sent: Saturday, May 17, 2025 3:38 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Drawdown

To whom It May Concern

I am in favor of the Detroit Lake drawdown. The problem with the salmon runs has been ignored for far too long and should no longer be deferred to another blue-ribbon committee for yet another study. Meanwhile the North Santiam fish are going extinct. Draw the lake down! Let the communities invest in water cleanliness instead of a myriad of other things if that is a priority for them. To say it will affect drinking water may be true but a lot of people drink and cook with bottled water already.

I am sorry if it temporarily affects fishing for non-native fish, but a short-term interruption will result in much better native fish runs in the future. Recreation was not the main reason for building the dam in the first place, flood control and electricity were.

I encourage you to save the fish runs in the North Santiam River. Native fish extinction in a once vibrant river should not be allowed. Please do not delay this any longer!!

Sincerely,
Frances McGuire
PO Box 317
Mill City, Oregon. 97360
Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

Herod, Megan K CIV (USA)

From: BARB & RON <apa33@aol.com>
Sent: Saturday, May 17, 2025 1:58 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source]

we are completely against that far of a drop down

Herod, Megan K CIV (USA)

From: Bonnie Tornow <a.tornow@comcast.net>
Sent: Saturday, May 17, 2025 12:36 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit lake

Sent from my iPhone
God Bless
Bonnie Tornow
a.tornow@comcast.net
503-881-9179

Herod, Megan K CIV (USA)

From: Melissa Pollman <conkraft@gmail.com>
Sent: Saturday, May 17, 2025 11:25 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit lake draw down

To whom it may concern,
I am writing to express my concerns for the proposed draw down of Detroit Lake Resevoir. I am a property owner in both Salem and Detroit Lake. My concerns are threefold.

1. The city of Salem and the valley rely on Detroit Lake for public water. The recent draw down of the other reservoirs negatively impacted public drinking water for the communities. The lake is already held 5' lower than historic full pool for earthquake safety. This has resulted in much lower water levels late season compared to historic water levels. Lower levels cause algea blooms which has required water boil notices several times over the past 5 years. Drawing down even lower may negatively impact those of us who rely on public water.

2. The Santiam canyon was devastated during the fires of 2020. Rebuild has been slow especially for commercial businesses. This draw down will negatively impact the rebuild growth. The commercial businesses that did survive the fires will once again be hit economically. The economic landscape right now is already one of uncertainty. Government agencies should he working to support our small businesses not create even more economic uncertainty.

3. What is the down stream impact to other wildlife in an effort to rebuild the chinook salmon population? Steelhead fishing at Detroit lake is a large draw. Drawing down the lake levels so low will negatively impact the steelhead.

I believe the decision of the Army Corp of Engineers is short sited. I believe the consequences of this action will he greater than the potential benefits.

Please do not move forward with the deep drawdown

Thank you
Melissa Pollman
Sent from my iPhone

Herod, Megan K CIV (USA)

From: Bonnie Tornow <a.tornow@comcast.net>
Sent: Saturday, May 17, 2025 11:17 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit lake

To whom it may concern.

Concern for city of salem water supply. Several boil notices over recent years due to algae blooms caused by already low water levels.

This will have a Negative Impact on rebuilding community since santiam fire. Commercial businesses there can barely survive as it is. This will severely and negatively impact economic growth.

Attempts to rebuild chinook population will negatively impact steelhead

These are just a few ideas of he many reasons NOT to do this.

Cities that relied on water from greenpeter were seriously impacted due to the draw down.

Sent from my iPhone
God Bless
Bonnie Tornow
a.tornow@comcast.net
503-881-9179

Herod, Megan K CIV (USA)

From: Mick Cochran <mickco78@hotmail.com>
Sent: Saturday, May 17, 2025 10:55 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit draw down

I think you should wait until results are gathered from the other research sites before damaging/destroying another fishery and water supply system without knowing if will even help. I'm not opposed to doing it there's proof it will work but wait for additional data supporting the positive effects.
Sent from my iPhone

Herod, Megan K CIV (USA)

From: gmorgan729@centurylink.net
Sent: Saturday, May 17, 2025 10:28 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Stop Drawdown

Greetings!

I live in Salem, which currently has decent drinking water. I wish to keep it that way. Do not allow a deep drawdown at Detroit Lake.

Thank you.

Gary

Herod, Megan K CIV (USA)

From: Mike Christensen <papamikedc@gmail.com>
Sent: Saturday, May 17, 2025 6:57 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Willamette drawdowns

When Green Peter was taken down the last two years the South Santiam has run brown from silt for three months straight. What did this situation do to the main steam spawning of the the spring Chinook? Was there an environmental impact done for this? What about the native cutthroat trout on this system? Before the dams there is no way the river ran that muddy for three months straight. If Detroit lake is dropped like GP Salem's water supply will be just like Sweet home and Lebanon s was. Why r we not broodstocking the Willamette system? It is the most populated area, with increased fish numbers from broodstocking like in the 70s and early 80s economic activity from this rec fisher makes sense. There is a brand new fish hatchery on the north above mill city, as well as facilities at all the will. Dams. Broodstock both species. Detroit is becoming a great Kokanee fishery, when GP was dumped that fishery was highly damaged. Stop the extreme drawdowns .

Herod, Megan K CIV (USA)

From: brad@kokaneepoweroregon.com
Sent: Saturday, May 17, 2025 8:25 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Draw Down

The KPO has been investing thousands of dollars in building the kokanee fishery at Detroit. We have been paying for the hatchery raising, stocking, and clipping of the smolts. We have been running a study of released fish for over ten years now. Loosing this fishery would be a major impact on the kokanee fishery here in the valley where most of your fishermen live. With Green Peter's fishery destroyed by the draw down there is now at times as many as 100 boats on Detroit targeting kokanee. This brings a huge financial market to both the local communities and the many kokanee tackle manufactures. The results from the draw downs at Green Peter show this has very little positive results on the survivability of the smolts but the damage to the total environment have been very negative. The city of Detroit has already lost due to the fires. Now loosing the kokanee fishery would be devastating to the community. The kokanee fishery goes year round and lowering the lake to the levels proposed would eliminate the winter fishery on this lake.

Why are you not moving to install the smolt trap above the dam? This is a proven an effective method up in Washington above Merwin and Yale lakes. The draw downs are not that effective and the damage to the ecosystem, local economies, recreation, fisheries, etc. are very negative.

Please consider an alternative to the draw down as this will be devastating if done.

Tight Lines,

Brad Halleck
KPO Board

Herod, Megan K CIV (USA)

From: Ray Braswell <minnow_140@q.com>
Sent: Saturday, May 17, 2025 7:37 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Draw Down

Willamette;

Some species on this planet are just "descended" to extinction. The
" Dinosaur, Dodo Bird, Steller's Sea Cow, Homing Pigeon, and in the future Man himself. I'm a lifelong Fisherman myself, but if the "Summer Cinook" run dies off in the Willamette because of "Man, disease, or natural selection , so be it.

Us Humanes always think we know what is best for so many things when it comes to wildlife and our planet. Also, lets not forget the "Palisades Fire" that just happened in California. Because of "Man's" ignorant decision's, their Reservoirs were so drawn down there was no water for "Firefighter Choppers" to dip water, and entire towns were lost.

In closing, please keep with the same practices as in the past when it comes to managing's Detroit Lake's water levels.

Thank you.
Ray Braswell
Salem Oregon

Herod, Megan K CIV (USA)

From: Randy McCall <randymccall3575@gmail.com>
Sent: Saturday, May 17, 2025 7:19 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Re: Detroit Lake proposed drawdown

To whom it may concern,

As a Salem resident who would not be affected by any downstream water quality issues of the proposed Detroit Lake winter drawdowns, I understand the concerns of cities and residents. The Sweet Home residents have seen the affects of the proposed actions after Peter Green Reservoir was similarly treated. But I also believe that there is no
reasonable alternative to preserving the salmon runs that are in critical condition and only getting worse.

Water quality issues will be difficult and expensive to mitigate, but that is not a sufficient reason to allow the continued path toward extinction that current operations all but guarantee. This is just matter of technology and planning - there are ways of dealing w the sediment even if expensive to implement.

In summary I remain strongly in favor of curtailing current hydropower priorities wrt to Willamette valley dams and I am strongly in favor of the proposed deep drawdowns of the pools during winter months. The 50+ years of Federally supported damage caused entirely by the construction and operation of the Federal dams have decimated salmon runs - it's time to fix that, and the Feds should be responsible for those unintended consequences of their actions (IE, they should be paying for the mitigations for downstream water treatment and quality issues).

Sincerely,

Randall L McCall
Salem, OR

Herod, Megan K CIV (USA)

From: Michael Mullejans <michael_mullejans@yahoo.com>
Sent: Saturday, May 17, 2025 7:02 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Please consider the consequences

The planned drawdown would be catastrophic for the water filtering systems of Stayton, all neighboring communities, and Salem and it's suburbs. This would cause considerable losses, costs, and suffering to the population.
The intent is laudable, but the drastic measures contemplated and their consequences are daunting.
Please reconsider this project.
Best regards,
Michael Mullejans
Stayton, Oregon

Yahoo Mail: Search, Organize, Conquer

Herod, Megan K CIV (USA)

From: Jay Poulos <osu49er@gmail.com>
Sent: Saturday, May 17, 2025 6:47 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Draw down

It makes little sense to draw down Detroit Lake, killing thousands of one breed of salmon (Kokanee) to save another breed of salmon (Chinook). A similar drawdown at Green Peter reservoir killed thousands of Kokanee. I'm assuming the same will happen at Detroit Lake. Not to mention the foul water the residents downstream will suffer through. It's not worth the cost and effort to ruin one fishery to aid another meanwhile fouling the main source of drinking water for major Oregon cities. I oppose the drawdown.

Jay Poulos
Salem, Oregon

Herod, Megan K CIV (USA)

From: Haley Lehman <hnproctor@gmail.com>
Sent: Saturday, May 17, 2025 6:44 AM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Comment on Detroit Lake Drawdown

Hello,

I'd like to offer my thoughts on the proposed Detroit Lake drawdown. In my opinion, we all must take necessary actions to assist the endangered salmon population, which has been affected by past human choices. Additionally, I believe it's crucial to restore the ecosystem to its natural state, as much as possible. I frequently drive past the Detroit Lake area, and I'm deeply concerned about the bare and unnatural appearance of the stumps. Lastly, if the drawdown will impact cities' water supplies, collaboration should be established to mitigate these effects. The city of Salem is already facing significant challenges in securing funding.

Thanks,

Haley Lehman

Herod, Megan K CIV (USA)

From: Spear,Daniel J (BPA) - PGSM-5 <djspear@bpa.gov>
Sent: Friday, May 16, 2025 12:58 PM
To: CENWP-PME-Williamette-Valley-System-EIS; Tackley, Kathryn L CIV USARMY CENWP (USA)
Subject: [Non-DoD Source] RE: USACE, Portland District issues a NOI to prepare a Supplemental EIS

We are all agog at the art work on your public notice announcement poster. Stunning!

From: CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil>
Sent: Friday, May 16, 2025 11:54 AM
Subject: USACE, Portland District issues a NOI to prepare a Supplemental EIS

The U.S. Army Corps of Engineers, Portland District published a Notice of Intent to Prepare a Supplemental Environmental Impact Statement for the Operation and Maintenance of the Willamette Valley System in the Federal Register.

Please see the attached public notice to interested parties regarding the public comment period.

https://www.nwp.usace.army.mil/WVS-EIS/

Herod, Megan K CIV (USA)

From: Oliver, E A (Liz) CIV (USA)
Sent: Tuesday, July 1, 2025 5:48 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: FW: CLARIFICATION: Willamette Valley System SEIS
Attachments: BPA Letter to Corps Portland District on Willamette Supplemental EIS.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:00pm PT
Out Fridays July 18 – August 8

From: Wells, Elizabeth R CIV USARMY CENWP (USA) <Elizabeth.R.Wells@usace.army.mil>
Sent: Monday, June 23, 2025 9:50 AM
To: Oliver, E A (Liz) CIV (USA) <Liz.Oliver@usace.army.mil>; Lyon, Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>; Gibbons, Amy C CIV USARMY CENWP (USA) <Amy.C.Gibbons@usace.army.mil>; Tackley, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Tackley@usace.army.mil>; Ringold, Valerie A CIV USARMY CENWP (USA) <Valerie.A.Ringold@usace.army.mil>
Subject: FW: CLARIFICATION: Willamette Valley System SEIS

FYSA

From: Cathcart,Michelle M (BPA) - P-6 <mmcathcart@bpa.gov>
Sent: Friday, June 20, 2025 3:56 PM
To: Wells, Elizabeth R CIV USARMY CENWP (USA) <Elizabeth.R.Wells@usace.army.mil>
Cc: Coffey, Frances E (Beth) SES USARMY CENWD (USA) <Frances.E.Coffey@usace.army.mil>; Thompson, Bradley E CIV USARMY CENWD (USA) <Bradley.E.Thompson@usace.army.mil>; Kintz,Jesse H (BPA) - PG-5 <jhkintz@bpa.gov>; Armentrout,Scott G (BPA) - E-4 <sgarmentrout@bpa.gov>
Subject: [Non-DoD Source] CLARIFICATION: Willamette Valley System SEIS

Please note that the title of the previous attachment was incorrect, and these comments are on the Supplemental EIS. The attached is the same content with the corrected title

Michelle Cathcart
BONNEVILLE POWER ADMINISTRATION
DEPARTMENT OF ENERGY
Senior Vice President (Acting) | Power Services
mmcathcart@bpa.gov | O: 503-230-4270 | C: 360-524-1931

From: Cathcart,Michelle M (BPA) - P-6
Sent: Friday, June 20, 2025 2:29 PM
To: Wells, Elizabeth R CIV USARMY CENWP (USA) <elizabeth.r.wells@usace.army.mil>
Cc: frances.e.coffey@usace.army.mil; Thompson, Bradley E CIV USARMY CENWD (USA) <bradley.e.thompson@usace.army.mil>; Kintz,Jesse H (BPA) - PG-5 <jhkintz@bpa.gov>; Armentrout,Scott G (BPA) - E-4 <sgarmentrout@bpa.gov>
Subject: Willamette Valley System EIS

Dear Ms. Wells,
Attached, please find Bonneville's comments on the Willamette Valley System Environmental Impact Statement.

Thank you,

Michelle Cathcart
BONNEVILLE POWER ADMINISTRATION
DEPARTMENT OF ENERGY
Senior Vice President (Acting) | Power Services
mmcathcart@bpa.gov | O: 503-230-4270 | C: 360-524-1931

Department of Energy

Official File

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

POWER SERVICES

June 20, 2025

In reply refer to: PG-5

Liza Wells
Deputy District Engineer for Programs and Project Management
Portland District
U.S. Army Corps of Engineers

Ms. Wells,

As a cooperating agency providing our special expertise as a federal hydropower marketing agency, Bonneville Power Administration (Bonneville) submits these additional comments on the Willamette Valley System Supplemental Environmental Impact Statement (SEIS) following our initial May 16th, 2025, comment letter. Overall, Bonneville is concerned that the US Army Corps of Engineers' (Corps) proposed Alternative 6 narrows its focus to the sole option of removing hydropower equipment and replacing it with non-generating infrastructure. In addition, Bonneville continues to believe that there are other ways to address non-hydropower solutions, and that such solutions may be unique to each dam. Therefore, a dam-by-dam analysis approach would best facilitate a robust and transparent assessment of creative, cost-effective fish-passage strategies for stakeholders, Tribes, and Congress.

Draft Alternative 6 is too narrow and fails to lay the foundation for dam-specific analysis in the SEIS to evaluate fish-passage and cost-effective hydropower options. During the SEIS scoping period, the Corps shared a PowerPoint summary of its draft Alternative 6 approach to address Section 1326 of the Water Resources Development Act (WRDA) 2024 requiring a formal analysis of an alternative that ceases hydropower operations. Bonneville has three major concerns with the current proposed approach:

1. The non-hydropower alternative should focus on removing hydropower operations as a constraint and not solely on the removal of hydropower infrastructure. The draft Alternative 6 limits evaluation to a single, narrow hydropower removal approach and excludes other, potentially more cost effective, means to achieve non-hydropower approaches to fish passage. The current draft Alternative 6 assumes that maintaining the water-conveyance and energy-dissipation elements provided by the

current hydropower generating infrastructure would require the costly process of removing and replacing the generating infrastructure with new equipment that dissipates the energy. As Bonneville stated in our May 16th letter, other, potentially more practical measures consistent with ceasing hydropower operations should also be examined.

2. As highlighted initially in our May 2025 comment letter, Bonneville continues to believe that scoping the non-hydropower alternative with a dam-by-dam analysis approach of specific measures at each dam is needed to transparently address stakeholder and Congressional interest in the potential for more effective, practical, and economical fish-passage options. The current draft Alternative 6 adopts a one-size-fits-all approach to all eight power-producing projects without regard for individual configuration and water management considerations at each dam. The eight power-producing projects all have unique characteristics, and potential operational flexibilities to benefit Endangered Species Act-listed species, which need to be considered and evaluated independently. For example, under the recent Oregon United States District Court injunction, different operations were identified for the different projects. Additionally, the Corps is implementing measures at Cougar Dam on the McKenzie River that include a delayed refill of the reservoir that is more likely to leave it below full summer rule curve while still maintaining other project purposes in the short term, and a long-term proposed operation at Cougar that will leave the reservoir permanently well beneath the penstocks and utilize the diversion tunnel as a passage route. The WRDA 2024 Section 1326 directs the Corps to explore a non-hydropower alternative that ceases hydropower operations and does not limit the alternative to removing the power producing infrastructure. Bonneville disagrees with the premise that removing the power generating infrastructure and replacing it with costly energy dissipation infrastructure best fits the circumstances present at each dam.

3. The draft Alternative 6 approach of removing and replacing hydropower equipment without a clear link to operational fish-passage benefits without the hydropower constraint fails to capitalize on the intent of the WRDA 2024 Section 1326 legislation. The legislation was informed by stakeholder input seeking more affordable and effective fish-passage options based on concerns about the effectiveness of costly fish structures and hydropower economics. Including all

components from the Final EIS's preferred alternative—particularly structural measures—in the current formulation of Alternative 6 precludes a meaningful tradeoff analysis of how the dams could be operated to meet authorized purposes and protect fish without hydropower as an operational constraint.

The current proposed SEIS schedule risks missing opportunities to achieve multiple objectives more quickly and efficiently. Bonneville understands that the Corps would like to complete this SEIS environmental analysis process on a very abbreviated schedule, but that should not be at the cost of ignoring alternatives that could better address cost-effective power production. Bonneville believes that the highly expedited schedule does not allow for the consideration of other non-hydropower options and a more thorough exploration of measures with the cooperating agencies, Tribes and other stakeholders that may better achieve fish passage objectives, as Congress has requested. There may be creative fish-protecting solutions (e.g., drawdowns) at one or more dams that are more biologically effective, less expensive, and much faster to implement than fish structures, and achieve a better balance of fish passage objectives with Congressional direction and other administration priorities.

Additional scoping input for the non-hydro alternative to better evaluate fish passage in a cost-effective manner. The Corps should work with cooperators, Tribes, and stakeholders to consider the following measures as part of a revised Alternative 6:

1. Operational options for fish passage not relying on the power intakes (penstocks);
2. Leaving turbine and hydropower infrastructure in place and focusing their operation to advance biological or water-quality objectives such as total dissolved gas moderation; and exploring whether power incidentally produced during that operation could exist under another authorization and disposed of as surplus; and
3. Evaluating flexibility at each reservoir to operate at alternative reservoir levels, such as the measure selected for Cougar dam in the Corps' May 2025 Record of Decision, and to determine, in working with cooperating agencies, if allowing that flexibility leads to promising fish-passage operations.

Uneconomic commercial hydropower needs to be addressed. Overall, Bonneville remains concerned that, in addition to missing the opportunity to fully explore operational solutions for ESA-listed fish, the SEIS as currently framed will not provide a practical path forward to remove or remedy uneconomic commercial hydropower. Subsequent actions,

including the completion of the disposition studies called for in WRDA 2022, are needed to address these issues if they remain unaddressed in the SEIS.

Thank you for considering Bonneville's SEIS scoping comments provided in this letter. We look forward to further engaging with the Corps and other cooperating agencies in the further development of SEIS.

Michelle Cathcart
Acting Executive Vice President
Power Services

Scott Armentrout
Executive Vice President
Environment, Fish and Wildlife

Herod, Megan K CIV (USA)

From: Oliver, E A (Liz) CIV (USA)
Sent: Tuesday, July 1, 2025 5:51 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: FW: WVS-SEIS--Cooperating Agencies request for extension of time
Attachments: CTGR_ODA_request for ext_WVS SEIS_5 23 2025.pdf

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:00pm PT
Out Fridays July 18 – August 8

From: Michael Karnosh <Michael.Karnosh@grandronde.org>
Sent: Friday, May 23, 2025 12:14 PM
To: Oliver, E A (Liz) CIV (USA) <Liz.Oliver@usace.army.mil>; Tackley, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Tackley@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Janes, Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Lyon, Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>; Hines, Kirsten Tracy (KiKi) CIV USARMY CENWP (USA) <Kirsten.T.Hines@usace.army.mil>
Cc: Colby Drake <Colby.Drake@grandronde.org>; Kelly Dirksen <Kelly.Dirksen@grandronde.org>; Lawrence Schwabe <Lawrence.Schwabe@grandronde.org>; Keri Handaly <Keri.Handaly@grandronde.org>; Brandon Weems <Brandon.Weems@grandronde.org>; 'Brett VandenHeuvel' <brett@vandenheuvelstrategies.com>; 'Caitlin Dols' <caitlin@vandenheuvelstrategies.com>; GOLDRICH-MIDDAUGH Grace * DEQ <Grace.Goldrich-Middaugh@deq.oregon.gov>; Josie Thompson - NOAA Federal <josie.thompson@noaa.gov>; 'REIS Kelly E * ODFW' <Kelly.E.REIS@odfw.oregon.gov>; 'Bangs, Brian L' <brian_bangs@fws.gov>; Hudson, Michael <michael_hudson@fws.gov>; Jim Myers - NOAA Federal <jim.myers@noaa.gov>; michelle.rub@noaa.gov; ROMER Jeremy D * ODFW <Jeremy.D.ROMER@odfw.oregon.gov>; KELLEY Elise X * ODFW <Elise.X.KELLEY@odfw.oregon.gov>; ZILLER Jeffrey S * ODFW <Jeffrey.S.ZILLER@odfw.oregon.gov>; COUTURE Ryan B * ODFW <Ryan.B.COUTURE@odfw.oregon.gov>; HIBBS Rob * ODA <Rob.HIBBS@oda.oregon.gov>; jeff.jorgensen@noaa.gov; MUCKEN Alyssa M * WRD <Alyssa.M.MUCKEN@water.oregon.gov>
Subject: [Non-DoD Source] WVS-SEIS--Cooperating Agencies request for extension of time
Importance: High

Dear Liz,

Please find attached a written request, signed by Confederated Tribes of Grand Ronde staff and the Oregon Department of Agriculture. I anticipate, but cannot guarantee, that similar requests (if not the same request) will be coming from other Cooperating Agencies in the near future.

Please feel free to contact me anytime with questions. As always, I appreciate your time and willingness to communicate.

Many thanks,
Michael

Michael Karnosh
Ceded Lands Manager
Confederated Tribes of Grand Ronde
M: 971-237-7200
O: 503-879-1316

The Confederated Tribes of the Grand Ronde Community of Oregon

Office of Ceded Lands
Phone (503) 879-1316
1-800-422-0232

9615 Grand Ronde Road
Grand Ronde, OR 97347

May 23, 2025

U.S. Army Corps of Engineers
Portland District, Willamette Valley System EIS
ATTN: Liz Oliver, Project Manager

via email to Liz.Oliver@usace.army.mil

RE: Cooperating Agencies' request for extension of time

Dear Liz Oliver:

Regarding the Scoping Period for the Supplemental Environmental Impact Statement for the Willamette Valley System (WVS-SEIS)—

The Cooperating Agencies respectfully request an extension of time. A time extension before the process moves to public review and comment would allow for further conversation between the Corps and the Cooperating Agencies whereby information may be presented, explained, clarified, developed, reviewed, and/or discussed, specifically regarding the analysis of Hydropower Deauthorization and associated potential impact. An extension of 30 days, or long enough that a Cooperating Agencies workshop(s) adequately addressing this issue may be held, would greatly benefit the analysis as a whole.

Thank you for considering this request. Cooperating Agencies appreciate the ongoing dialogue with the Corps on the EIS and related processes.

Sincerely,

Michael Karnosh
Ceded Lands Manager
Confederated Tribes of Grand Ronde

The Confederated Tribes of the Grand Ronde Community of Oregon

Office of Ceded Lands
Phone (503) 879-1316
1-800-422-0232

9615 Grand Ronde Road
Grand Ronde, OR 97347

May 23, 2025

U.S. Army Corps of Engineers
Portland District, Willamette Valley System EIS
ATTN: Liz Oliver, Project Manager

via email to Liz.Oliver@usace.army.mil

RE: Cooperating Agencies' request for extension of time

Dear Liz Oliver:

Regarding the Scoping Period for the Supplemental Environmental Impact Statement for the Willamette Valley System (WVS-SEIS)—

The Cooperating Agencies respectfully request an extension of time. A time extension before the process moves to public review and comment would allow for further conversation between the Corps and the Cooperating Agencies whereby information may be presented, explained, clarified, developed, reviewed, and/or discussed, specifically regarding the analysis of Hydropower Deauthorization and associated potential impact. An extension of 30 days, or long enough that a Cooperating Agencies workshop(s) adequately addressing this issue may be held, would greatly benefit the analysis as a whole.

Thank you for considering this request. Cooperating Agencies appreciate the ongoing dialogue with the Corps on the EIS and related processes.

Sincerely,

Michael Karnosh
Ceded Lands Manager
Confederated Tribes of Grand Ronde

Kevin Fenn
Water Quality and SWCD Program Manager
Oregon Department of Agriculture

Herod, Megan K CIV (USA)

From: Oliver, E A (Liz) CIV (USA)
Sent: Tuesday, July 1, 2025 5:57 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: FW: USFWS comments on WVS sEIS Scoping
Attachments: USFWS_SEISScoping_InitialComments2025_617_signed.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:00pm PT
Out Fridays July 18 – August 8

From: Oliver, E A (Liz) CIV (USA)
Sent: Monday, June 23, 2025 11:02 AM
To: Clark, Steven J CIV USARMY CEMVP (USA) <Steven.J.Clark@usace.army.mil>; Dorsey, Garrett L CIV USARMY CENWP (USA) <Garrett.L.Dorsey@usace.army.mil>; Griffith, David W CIV USARMY CENWP (USA) <David.W.Griffith@usace.army.mil>; Janes, Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Lyon, Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>; Piaskowski, Richard M CIV USARMY CENWP (USA) <Richard.M.Piaskowski@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Warner, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Warner@usace.army.mil>
Subject: FW: USFWS comments on WVS sEIS Scoping

FYI

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:00pm PT

From: Bangs, Brian L <brian_bangs@fws.gov>
Sent: Friday, June 20, 2025 1:32 PM
To: Oliver, E A (Liz) CIV (USA) <Liz.Oliver@usace.army.mil>
Cc: Lee, Kessina <kessina_lee@fws.gov>; Covington, Scott <Scott_Covington@fws.gov>; Hudson, Michael <michael_hudson@fws.gov>; Moran, Bridget N <bridget_moran@fws.gov>; Anne Mullan - NOAA Federal <anne.mullan@noaa.gov>; samuel.bankston@noaa.gov; michael.karnosh@grandronde.org; lawrence.schwabe@grandronde.org; grace.goldrich-middaugh@deq.oregon.gov; REIS Kelly E * ODFW <kelly.e.reis@odfw.oregon.gov>; Rob.HIBBS@oda.oregon.gov; alyssa.m.mucken@water.oregon.gov; Tackley, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Tackley@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Janes, Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Lyon,

Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>
Subject: [Non-DoD Source] USFWS comments on WVS sEIS Scoping

Liz,

Thank you for the opportunity to provide comments on the USACE scoping process for the WVS sEIS. Please see the attached letter with comments from the USFWS. We look forward to continued engagement as the sEIS is developed.

Thank you and have a great weekend!

Sincerely,

Brian Bangs
Aquatic Ecologist
Oregon Fish and Wildlife Office
U.S. Fish & Wildlife Service, Region 1
Portland, Oregon
Brian_Bangs@fws.gov
Cell: 541-908-1538

Website: http://www.fws.gov/oregonfwo/

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oregon Fish and Wildlife Office
2600 SE 98th Avenue, Suite 100
Portland, Oregon 97266
Phone: (503) 231-6179 FAX: (503) 231-6195

File Number: 25-0019
File Name: U.S. Fish and Wildlife Service Comments on Willamette Valley Operations and Maintenance Supplemental Environmental Impact Statement Scoping
TS Number: 25-309

Liz Oliver, Project Manager
U.S. Army Corps of Engineers, Portland District
P.O. Box 2870
Portland, Oregon 97208-2870

Sent via email to liz.oliver@usace.army.mil on June 18, 2025

Subject: U.S. Fish and Wildlife Service Comments on Willamette Valley Operations and Maintenance Supplemental Environmental Impact Statement Scoping

Dear Liz Oliver:

Thank you for the opportunity to provide comments to the scoping process for the development of a supplemental Environmental Impact Statement (sEIS) on the operation and maintenance of the Willamette Valley System (WVS) by the U.S. Army Corps of Engineers (USACE). These comments are being provided as a cooperating agency (CA) in response to a high-level overview and request for comments on the scope of the sEIS presented to CAs on May 19, 2025. As noted by the U.S. Fish and Wildlife Service (USFWS) and other CAs in that meeting and in follow-up conversations with USACE staff, the information provided, the process, and the timeline for providing input to USACE are not ideal. USFWS provided a letter to USACE to this end on May 29, 2025, with a request for an extension of at least 30 days, or an extension that allows for CA workshops to further explore questions and issues around the additional proposed alternative(s) and measures.

Additional information on the new alternative(s) and measures and opportunities to help shape those would result in a better understanding of what is being proposed and elicit more meaningful feedback at this time. With that in mind and given the short timeframe in which to provide feedback, USFWS provides the following for consideration as USACE proceeds with the development of this sEIS.

General Comments

- USACE proposed intent under the alternative being presented in this sEIS to seek authority to remove a purpose at WVS projects presents an opportunity to explore alternatives that include flexibilities in operation and maintenance of these projects that may not be considered otherwise. For example, with the end of hydropower operations, reservoirs behind the projects could continue to be managed on the existing rule curve, a modified rule curve, or run-of-the-river, while still meeting the other authorized purposes of the projects. These measures could be applied differentially across the projects and multiple alternatives developed and analyzed. Exploring these and other options through workshops with the CAs could inform the scope of the sEIS to be presented to the public.

Proposed Alternative 6 – End Hydropower Operations at Willamette Valley System Dams

- As presented, this alternative is an "all or nothing" approach to ending hydropower at WVS dams. We recommend an alternative that includes only ending hydropower at a subset of WVS dams.
- Recommend the development of alternatives that include modified operation scenarios using multiple existing and potentially new outlets at WVS dams so those can be analyzed.
- Recommend the inclusion of measures to seek authorization and removal of Big Cliff and Dexter re-regulation dams so that the public can respond to these in the scoping process and those concerns and perspectives can be integrated into the draft sEIS.

Detroit Deep Drawdown

- Can this action be modified with the removal of hydropower at Detroit and Big Cliff dams? If so, recommend analysis consider this deep drawdown with and without hydropower at Detroit and/or Big Cliff dams.

Thank you again for the opportunity to provide comments at this stage. We anticipate and look forward to continued engagement as a CA through this process and additional opportunities to help shape and respond to the developing sEIS. If you have any questions regarding these comments, please contact Brian Bangs (brian_bangs@fws.gov) and Mike Hudson (michael_hudson@fws.gov).

Sincerely,

Bridget Moran,
Deputy State Supervisor

cc: Kessina Lee, USFWS, Oregon FWO, State Supervisor
Scott Covington, USFWS, Columbia River FWCO, Project Leader
Mike Hudson, USFWS, Columbia River FWCO, Supv Fish Biologist

Brian Bangs, USFWS, Oregon FWO, Aquatic Ecologist

Cooperating Agencies:

Michael Karnosh, CTGR
Lawrence Schwabe, CTGR
Grace Goldrich-Middaugh, ODEQ
Kelly Reis, ODFW
Sam Bankston, NMFS
Anne Mullan, NMFS
Rob Hibbs, ODA
Alyssa Mucken, OWRD

USACE:

Kathryn Tackley
Greg Taylor
Kelly Janes
Amanda Lyon

Herod, Megan K CIV (USA)

From: Oliver, E A (Liz) CIV (USA)
Sent: Tuesday, July 1, 2025 5:58 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: FW: USFWS Request for Extension of Time for WVS SEIS Scoping Period
Attachments: USFWS_SEISScoping_RequestforExtension_20250529.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:00pm PT
Out Fridays July 18 – August 8

From: Oliver, E A (Liz) CIV (USA)
Sent: Thursday, May 29, 2025 11:14 AM
To: Clark, Steven J CIV USARMY CEMVP (USA) <Steven.J.Clark@usace.army.mil>; Dorsey, Garrett L CIV USARMY CENWP (USA) <Garrett.L.Dorsey@usace.army.mil>; Griffith, David W CIV USARMY CENWP (USA) <David.W.Griffith@usace.army.mil>; Janes, Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Lyon, Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>; Piaskowski, Richard M CIV USARMY CENWP (USA) <Richard.M.Piaskowski@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Warner, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Warner@usace.army.mil>
Subject: FW: USFWS Request for Extension of Time for WVS SEIS Scoping Period

fyi

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:30pm PT
March 31-June 9: out at 1:30pm on Mondays

From: Hudson, Michael <michael_hudson@fws.gov>
Sent: Thursday, May 29, 2025 11:09 AM
To: Oliver, E A (Liz) CIV (USA) <Liz.Oliver@usace.army.mil>
Cc: Anne Mullan <anne.mullan@noaa.gov>; Samuel Bankston - NOAA Federal <samuel.bankston@noaa.gov>; michael.karnosh@grandronde.org; lawrence.schwabe@grandronde.org; GOLDRICH-MIDDAUGH Grace * DEQ <grace.goldrich-middaugh@deq.oregon.gov>; REIS Kelly E * ODFW <kelly.e.reis@odfw.oregon.gov>; HIBBS Rob * ODA <Rob.HIBBS@oda.oregon.gov>; MUCKEN Alyssa M * WRD <alyssa.m.mucken@water.oregon.gov>; Tackley, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Tackley@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Janes, Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Lyon,

Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>; Bangs, Brian L <brian_bangs@fws.gov>; Lee, Kessina <kessina_lee@fws.gov>; Moran, Bridget N <bridget_moran@fws.gov>; Covington, Scott <Scott_Covington@fws.gov>; Hudson, Michael <michael_hudson@fws.gov>
Subject: [Non-DoD Source] USFWS Request for Extension of Time for WVS SEIS Scoping Period

Liz,

I am providing the attached request on behalf of the US Fish and Wildlife Service. Please feel free to contact me with any questions. We appreciate your consideration of this request.

Sincerely,

Michael Hudson

Supervisory Fish and Wildlife Biologist | US FISH & WILDLIFE SERVICE

michael_hudson@fws.gov | www.fws.gov/columbiariver/

360.604.2500 office | 360.322.3446 direct | 503.936.4661 mobile

Columbia River Fish and Wildlife Conservation Office

1211 SE Cardinal Court, Suite 100, Vancouver, WA 98683

><((('>

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Columbia River Fish and Wildlife Conservation Office
1211 SE Cardinal Court, Suite 100
Vancouver, Washington 98683

May 29, 2025

Liz Oliver, Project Manager
U.S. Army Corps of Engineers, Portland District
P.O. Box 2870
Portland, Oregon 97208-2870

Sent via email to liz.oliver@usace.army.mil on May 29,2025

Subject: Cooperating Agencies' Request for an Extension of Time in the Scoping Process for the Supplemental EIS to the Willamette Valley System EIS (WVS SEIS)

Dear Liz Oliver:

As a Cooperating Agency, the U.S. Fish and Wildlife Service (USFWS) respectfully requests an extension of time. An extension of the Scoping Period, before the process moves to public review and comment, would allow for further conversation between the Corps and the Cooperating Agencies whereby information may be presented, explained, clarified, developed, reviewed, and/or discussed, specifically regarding the analysis of Hydropower Deauthorization and associated potential impacts. An extension of at least 30 days, or an extension that allows for Cooperating Agencies workshop(s) planning, through which this information can be provided and discussed, would greatly benefit the analysis as a whole.

Thank you for considering this request. USFWS appreciates the ongoing dialogue with the Corps on the EIS and related processes.

Sincerely,

Scott Covington,
Project Leader

cc: Kessina Lee, USFWS, Oregon FWO, State Supervisor
Bridget Moran, USFWS, Oregon FWO, Deputy State Supervisor
Mike Hudson, USFWS, Columbia River FWCO, Supv Fish Biologist
Brian Bangs, USFWS, Oregon FWO, Aquatic Ecologist

Cooperating Agencies:

Michael Karnosh, CTGR
Lawrence Schwabe, CTGR
Grace Goldrich-Middaugh, ODEQ
Kelly Reis, ODFW
Sam Bankston, NMFS
Anne Mullan, NMFS
Rob Hibbs, ODA
Alyssa Mucken, OWRD

USACE:

Kathryn Tackley
Greg Taylor
Kelly Janes
Amanda Lyon

Herod, Megan K CIV (USA)

From: Oliver, E A (Liz) CIV (USA)
Sent: Tuesday, July 1, 2025 5:58 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: FW: WVS-SEIS--Cooperating Agencies request for extension of time
Attachments: RE DEQ Willamette SEIS MAY25_Signed.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:00pm PT
Out Fridays July 18 – August 8

From: Oliver, E A (Liz) CIV (USA)
Sent: Friday, May 23, 2025 2:45 PM
To: Clark, Steven J CIV USARMY CEMVP (USA) <Steven.J.Clark@usace.army.mil>; Dorsey, Garrett L CIV USARMY CENWP (USA) <Garrett.L.Dorsey@usace.army.mil>; Griffith, David W CIV USARMY CENWP (USA) <David.W.Griffith@usace.army.mil>; Janes, Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Lyon, Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>; Piaskowski, Richard M CIV USARMY CENWP (USA) <Richard.M.Piaskowski@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Warner, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Warner@usace.army.mil>
Subject: FW: WVS-SEIS--Cooperating Agencies request for extension of time

Second request.

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:30pm PT
March 31-June 9: out at 1:30pm on Mondays

From: GOLDRICH-MIDDAUGH Grace * DEQ <Grace.Goldrich-Middaugh@deq.oregon.gov>
Sent: Friday, May 23, 2025 2:37 PM
To: Michael Karnosh <Michael.Karnosh@grandronde.org>; Oliver, E A (Liz) CIV (USA) <Liz.Oliver@usace.army.mil>; Tackley, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Tackley@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Janes, Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Lyon, Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>; Hines, Kirsten Tracy (KiKi) CIV USARMY CENWP (USA) <Kirsten.T.Hines@usace.army.mil>; TUGAW Heather * DEQ <Heather.TUGAW@deq.oregon.gov>; WIGAL Jennifer * DEQ <Jennifer.WIGAL@deq.oregon.gov>
Cc: DRAKE Colby <colby.drake@grandronde.org>; Kelly Dirksen <Kelly.Dirksen@grandronde.org>; Lawrence Schwabe

<Lawrence.Schwabe@grandronde.org>; Keri Handaly <Keri.Handaly@grandronde.org>; Brandon Weems <Brandon.Weems@grandronde.org>; 'Brett VandenHeuvel' <brett@vandenheuvelstrategies.com>; 'Caitlin Dols' <caitlin@vandenheuvelstrategies.com>; Josie Thompson - NOAA Federal <josie.thompson@noaa.gov>; REIS Kelly E * ODFW <Kelly.E.REIS@odfw.oregon.gov>; 'Bangs, Brian L' <brian_bangs@fws.gov>; Hudson, Michael <michael_hudson@fws.gov>; Jim Myers - NOAA Federal <jim.myers@noaa.gov>; michelle.rub@noaa.gov; ROMER Jeremy D * ODFW <Jeremy.D.ROMER@odfw.oregon.gov>; KELLEY Elise X * ODFW <Elise.X.KELLEY@odfw.oregon.gov>; ZILLER Jeffrey S * ODFW <Jeffrey.S.ZILLER@odfw.oregon.gov>; COUTURE Ryan B * ODFW <Ryan.B.COUTURE@odfw.oregon.gov>; HIBBS Rob * ODA <Rob.HIBBS@oda.oregon.gov>; jeff.jorgensen@noaa.gov; MUCKEN Alyssa M * WRD <Alyssa.M.MUCKEN@water.oregon.gov>
Subject: [Non-DoD Source] RE: WVS-SEIS--Cooperating Agencies request for extension of time

Dear Liz and all,
Please find attached DEQ's request for extension which echoes the request provided earlier today by CTGR and ODA.

I appreciate the communication and coordination by USACE and the cooperating agencies and look forward to further collaboration.

Best,
Grace Goldrich-Middaugh

From: Michael Karnosh <Michael.Karnosh@grandronde.org>
Sent: Friday, May 23, 2025 12:14 PM
To: 'Oliver, E A (Liz) CIV (USA)' <Liz.Oliver@usace.army.mil>; 'Tackley, Kathryn L CIV USARMY CENWP (USA)' <Kathryn.L.Tackley@usace.army.mil>; 'Taylor, Gregory A CIV USARMY CENWP (USA)' <Gregory.A.Taylor@usace.army.mil>; 'Janes, Kelly A CIV USARMY CENWP (USA)' <Kelly.A.Janes@usace.army.mil>; 'Lyon, Amanda A CIV USARMY CENWP (USA)' <Amanda.A.Lyon@usace.army.mil>; 'Hines, Kirsten Tracy (KiKi) CIV USARMY CENWP (USA)' <Kirsten.T.Hines@usace.army.mil>
Cc: DRAKE Colby <Colby.Drake@grandronde.org>; Kelly Dirksen <Kelly.Dirksen@grandronde.org>; Lawrence Schwabe <Lawrence.Schwabe@grandronde.org>; Keri Handaly <Keri.Handaly@grandronde.org>; Brandon Weems <Brandon.Weems@grandronde.org>; 'Brett VandenHeuvel' <brett@vandenheuvelstrategies.com>; 'Caitlin Dols' <caitlin@vandenheuvelstrategies.com>; GOLDRICH-MIDDAUGH Grace * DEQ <Grace.Goldrich-Middaugh@deq.oregon.gov>; Josie Thompson - NOAA Federal <josie.thompson@noaa.gov>; REIS Kelly E * ODFW <Kelly.E.REIS@odfw.oregon.gov>; 'Bangs, Brian L' <brian_bangs@fws.gov>; Hudson, Michael <michael_hudson@fws.gov>; Jim Myers - NOAA Federal <jim.myers@noaa.gov>; michelle.rub@noaa.gov; ROMER Jeremy D * ODFW <Jeremy.D.ROMER@odfw.oregon.gov>; KELLEY Elise X * ODFW <Elise.X.KELLEY@odfw.oregon.gov>; ZILLER Jeffrey S * ODFW <Jeffrey.S.ZILLER@odfw.oregon.gov>; COUTURE Ryan B * ODFW <Ryan.B.COUTURE@odfw.oregon.gov>; HIBBS Rob * ODA <Rob.HIBBS@oda.oregon.gov>; jeff.jorgensen@noaa.gov; MUCKEN Alyssa M * WRD <Alyssa.M.MUCKEN@water.oregon.gov>
Subject: WVS-SEIS--Cooperating Agencies request for extension of time
Importance: High

Dear Liz,

Please find attached a written request, signed by Confederated Tribes of Grand Ronde staff and the Oregon Department of Agriculture. I anticipate, but cannot guarantee, that similar requests (if not the same request) will be coming from other Cooperating Agencies in the near future.

Please feel free to contact me anytime with questions. As always, I appreciate your time and willingness to communicate.

Many thanks,
Michael

Michael Karnosh
Ceded Lands Manager
Confederated Tribes of Grand Ronde
M: 971-237-7200
O: 503-879-1316

Oregon
Tina Kotek, Governor

Department of Environmental Quality
Headquarters Office
700 NE Multnomah Street, Suite 600
Portland, OR 97232
503-229-5263
TTY 711

May 23, 2025

via email to Liz.Oliver@usace.army.mil

U.S. Army Corps of Engineers
Portland District, Willamette Valley System EIS
ATTN: Liz Oliver, Project Manager

RE: Request for extension of time to provide comments

Dear Liz Oliver:

The Oregon Department of Environmental Quality (DEQ) appreciates the opportunity to participate in development of the Willamette Valley System Supplemental Environmental Impact Statement. DEQ supports and echoes the request for an extension of time to provide comments during the scoping phase of SEIS development by the Confederated Tribes of the Grand Ronde and Oregon Department of Agriculture. DEQ requests an extension of 30 days, or long enough that a Cooperating Agencies workshop may be held, during which additional information regarding analysis of the impacts of hydropower deauthorization may be provided to support meaningful participation and effective comments by Cooperating Agencies.

Thank you for your consideration.

Sincerely,

Jennifer Wigal
Water Quality Administrator
Oregon Department of Environmental Quality

Herod, Megan K CIV (USA)

From: Oliver, E A (Liz) CIV (USA)
Sent: Tuesday, July 1, 2025 5:58 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: FW: [Non-DoD Source] NMFS Request for Extension of Time for WVS SEIS Scoping Period
Attachments: EOT for Scoping WVS SEIS_NMFS letter_FINAL.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:00pm PT
Out Fridays July 18 – August 8

From: Oliver, E A (Liz) CIV (USA)
Sent: Friday, May 23, 2025 3:21 PM
To: Clark, Steven J CIV USARMY CEMVP (USA) <Steven.J.Clark@usace.army.mil>; Dorsey, Garrett L CIV USARMY CENWP (USA) <Garrett.L.Dorsey@usace.army.mil>; Griffith, David W CIV USARMY CENWP (USA) <David.W.Griffith@usace.army.mil>; Janes, Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Lyon, Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>; Piaskowski, Richard M CIV USARMY CENWP (USA) <Richard.M.Piaskowski@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Warner, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Warner@usace.army.mil>
Subject: FW: [Non-DoD Source] NMFS Request for Extension of Time for WVS SEIS Scoping Period

Third.

Sorry if I'm sending you doubles of these. Trying to get everyone in on Steering Team.

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:30pm PT
March 31-June 9: out at 1:30pm on Mondays

From: Josie Thompson - NOAA Federal <josie.thompson@noaa.gov>
Sent: Friday, May 23, 2025 3:11 PM
To: Oliver, E A (Liz) CIV (USA) <Liz.Oliver@usace.army.mil>
Cc: Kathleen Wells - NOAA Federal <kathleen.wells@noaa.gov>; Anne Mullan - NOAA Federal <anne.mullan@noaa.gov>; Samuel Bankston - NOAA Federal <samuel.bankston@noaa.gov>; Chris Fontecchio - NOAA Federal <chris.fontecchio@noaa.gov>; Michael Karnosh, Grand Ronde Tribes <michael.karnosh@grandronde.org>; Lawrence Schwabe (Lawrence.Schwabe@grandronde.org) <lawrence.schwabe@grandronde.org>; GOLDRICH-MIDDAUGH Grace *

DEQ <Grace.Goldrich-Middaugh@deq.oregon.gov>; REIS Kelly E * ODFW <Kelly.E.REIS@odfw.oregon.gov>; Hudson, Michael <michael_hudson@fws.gov>; Bangs, Brian L <brian_bangs@fws.gov>; HIBBS Rob * ODA <Rob.HIBBS@oda.oregon.gov>; MUCKEN Alyssa M * WRD <Alyssa.M.MUCKEN@water.oregon.gov>; Tackley, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Tackley@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Janes, Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Lyon, Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>
Subject: [Non-DoD Source] NMFS Request for Extension of Time for WVS SEIS Scoping Period

Dear Liz,

I am sending the attached request on behalf of Kate Wells, NMFS Assistant Regional Administrator to our Oregon and Washington Coastal Office, and our Willamette Branch WVS Team.

Please feel free to contact us with questions. We appreciate your time and willingness to communicate.

Regards,

Josie

Josie Thompson
Oregon-Washington Coastal Office, West Coast Region
NOAA Fisheries | U.S. Department of Commerce
Office: (503) 230-5409
Mobile: (503) 741-1694
https://www.fisheries.noaa.gov/region/west-coast
Sign up for West Coast Region public notices & newsletters

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
1201 NE Lloyd Boulevard, Suite 1100
PORTLAND, OR 97232

May 23rd, 2025

Liz Oliver, Project Manager
U.S. Army Corps of Engineers, Portland District
P.O. Box 2870
Portland, Oregon 97208-2870

Re: Cooperating Agencies' Request for an Extension of Time in the Scoping Process for the Supplemental EIS to the Willamette Valley System EIS (WVS SEIS)

Dear Liz Oliver:

Regarding the Scoping Period for the Supplemental Environmental Impact Statement for the Willamette Valley System (WVS-SEIS)—

As a Cooperating Agency, the National Marine Fisheries Service (NMFS) respectfully requests an extension of time. An extension of the Scoping Period, before the process moves to public review and comment, would allow for further conversation between the Corps and the Cooperating Agencies whereby information may be presented, explained, clarified, developed, reviewed, and/or discussed, specifically regarding the analysis of Hydropower Deauthorization and associated potential impacts. An extension of at least 30 days, or an extension that allows for Cooperating Agencies workshop(s) planning, through which this information can be provided and discussed, would greatly benefit the analysis as a whole.

Thank you for considering this request. NMFS appreciates the ongoing dialogue with the Corps on the EIS and related processes.

Sincerely,

Kathleen Wells
Assistant Regional Administrator
Oregon Washington Coastal Office
NMFS West Coast Region

cc: Sam Bankston, NMFS, Willamette Branch Supervisor
Anne Mullan, NMFS, Willamette Branch Biologist, WVS Project Lead

Chris Fontecchio, NMFS, Attorney-Advisor

Cooperating Agencies:

Michael Karnosh, CTGR
Lawrence Schwabe, CTGR
Grace Goldrich-Middaugh, ODEQ
Kelly Reis, ODFW
Michael Hudson, USFWS
Brian Bangs, USFWS
Rob Hibbs, ODA
Alyssa Mucken, OWRD

USACE:

Kathryn Tackley
Greg Taylor
Kelly Janes
Amanda Lyon

Herod, Megan K CIV (USA)

From: Oliver, E A (Liz) CIV (USA)
Sent: Tuesday, July 1, 2025 5:58 PM
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: FW: Cooperating Agency Meeting - WVS SEIS
Attachments: USACE WVS-SEIS Extension Request - ODFW 5-23-25.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:00pm PT
Out Fridays July 18 – August 8

From: Oliver, E A (Liz) CIV (USA)
Sent: Tuesday, May 27, 2025 10:18 AM
To: Clark, Steven J CIV USARMY CEMVP (USA) <Steven.J.Clark@usace.army.mil>; Dorsey, Garrett L CIV USARMY CENWP (USA) <Garrett.L.Dorsey@usace.army.mil>; Griffith, David W CIV USARMY CENWP (USA) <David.W.Griffith@usace.army.mil>; Janes, Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Lyon, Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>; Piaskowski, Richard M CIV USARMY CENWP (USA) <Richard.M.Piaskowski@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Warner, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Warner@usace.army.mil>
Subject: FW: Cooperating Agency Meeting - WVS SEIS

FYI

Thanks,

Liz Oliver
Project Manager
Cell: (503) 979-6256 (call/text)
Typical hours: 8:30am – 5:30pm PT
March 31-June 9: out at 1:30pm on Mondays

From: REIS Kelly E * ODFW <Kelly.E.Reis@odfw.oregon.gov>
Sent: Friday, May 23, 2025 5:15 PM
To: Herod, Megan K CIV (USA) <Megan.K.Herod@usace.army.mil>; Piaskowski, Richard M CIV USARMY CENWP (USA) <Richard.M.Piaskowski@usace.army.mil>; Oliver, E A (Liz) CIV (USA) <Liz.Oliver@usace.army.mil>; Griffith, David W CIV USARMY CENWP (USA) <David.W.Griffith@usace.army.mil>; Warner, Kathryn L CIV USARMY CENWP (USA) <Kathryn.L.Warner@usace.army.mil>; Hamilton, Jess CIV USARMY CENWP (USA) <Jessica.T.Hamilton@usace.army.mil>; Lyon, Amanda A CIV USARMY CENWP (USA) <Amanda.A.Lyon@usace.army.mil>; Dorsey, Garrett L CIV USARMY CENWP (USA) <Garrett.L.Dorsey@usace.army.mil>; Taylor, Gregory A CIV USARMY CENWP (USA) <Gregory.A.Taylor@usace.army.mil>; Bardy, April K CIV USARMY CENWP (USA) <April.K.Bardy@usace.army.mil>; Janes,

Kelly A CIV USARMY CENWP (USA) <Kelly.A.Janes@usace.army.mil>; Clark, Steven J CIV USARMY CEMVP (USA) <Steven.J.Clark@usace.army.mil>; aemai@bpa.gov; alheredia@bpa.gov; aljohnson@bpa.gov; MUCKEN Alyssa M * WRD <Alyssa.M.MUCKEN@water.oregon.gov>; anne.mullan@noaa.gov; asnagra@bpa.gov; bgoscar@bpa.gov; bitalac.emily@epa.gov; brad.houslet@ctwsbnr.org; Briece.Edwards@grandronde.org; briggs.nicole@epa.gov; ceder@usbr.gov; Chris Allen <chris_allen@fws.gov>; christian.nauer@ctwsbnr.org; Cope.Ben@epa.gov; djspear@bpa.gov; WOODCOCK Douglas E * WRD <Douglas.E.WOODCOCK@water.oregon.gov>; ejandersen@bpa.gov; KELLEY Elise X * ODFW <Elise.X.KELLEY@odfw.oregon.gov>; glbrown@bpa.gov; GOLDRICH-MIDDAUGH Grace * DEQ <Grace.Goldrich-Middaugh@deq.oregon.gov>; gsashby@bpa.gov; TUGAW Heather * DEQ <Heather.TUGAW@deq.oregon.gov>; STAPLETON Isaak * ODA <Isaak.STAPLETON@oda.oregon.gov>; jcallens@oda.state.or.us; jeff.jorgensen@noaa.gov; ZILLER Jeffrey S * ODFW <Jeffrey.S.ZILLER@odfw.oregon.gov>; WIGAL Jennifer * DEQ <Jennifer.WIGAL@deq.oregon.gov>; jgbarton@bpa.gov; jhkintz@bpa.gov; jim.myers@noaa.gov; Jeff Maslow <jjmaslow@bpa.gov>; josie.thompson@noaa.gov; jpkarnezis@bpa.gov; kathleen.wells@noaa.gov; kelly.dirksen@grandronde.org; kentankyla@outlook.com; keri.handaly@grandronde.org; kkoleini@usbr.gov; Schwabe, Lawrence - CTGR <Lawrence.Schwabe@grandronde.org>; lbchase@bpa.gov; Maier.Michelle@epa.gov; Marganne.ALLEN@oda.oregon.gov; Mbabaliye.Theogene@epa.gov; melissa.jundt@noaa.gov; Karnosh, Michael - CTGR <Michael.Karnosh@grandronde.org>; michael_hudson@fws.gov; MCCORD Mike L * WRD <Mike.L.MCCORD@water.oregon.gov>; MCCORD Mike L * WRD <Mike.L.MCCORD@water.oregon.gov>; morgan.bond@noaa.gov; Nirvana.Z.COOK@water.oregon.gov; Palmer.John@epa.gov; rich.zabel@noaa.gov; rjdiffely@bpa.gov; HIBBS Rob * ODA <Rob.HIBBS@oda.oregon.gov>; Bobby Bruno <robert.brunoe@ctwsbnr.org>; robison@willamettepartnership.org; COUTURE Ryan B * ODFW <Ryan.B.COUTURE@odfw.oregon.gov>; samuel.bankston@noaa.gov; Schlief.Scott@epa.gov; sfrollins@bpa.gov; CLEMENTS Shaun * ODFW <Shaun.CLEMENTS@odfw.oregon.gov>; stanvandewetering@yahoo.com; stbiegel@bpa.gov; MRAZIK Steve * DEQ <Steve.MRAZIK@deq.oregon.gov>; TCRobertK@ctsi.nsn.us; STAHL Tom * ODFW <Tom.Stahl@odfw.oregon.gov>; Wakeland, Torey - CTGR <Torey.Wakeland@grandronde.org>; Vallette.Yvonne@epa.gov; WIGAL Jennifer * DEQ <Jennifer.WIGAL@deq.oregon.gov>; LOBOY Zach * DEQ <Zach.LOBOY@deq.oregon.gov>
Cc: REIS Kelly E * ODFW <Kelly.E.REIS@odfw.oregon.gov>; STAHL Tom * ODFW <Tom.Stahl@odfw.oregon.gov>
Subject: [Non-DoD Source] RE: Cooperating Agency Meeting - WVS SEIS

Liz –

Please find attached Oregon Department of Fish and Wildlife's request for an extension to the deadline for SEIS scoping comments. The extension will allow further discussions between the USACE and the Cooperating Agencies on the proposed actions.

Thank-you for your consideration.

Kelly

Kelly Reis (she/her)

Willamette Fish and Wildlife Policy and Program Manager
Oregon Department of Fish & Wildlife
C: 541-517-2228
kelly.e.reis@odfw.oregon.gov

Oregon
Tina Kotek, Governor

Department of Fish and Wildlife
Fish Division
4034 Fairview Industrial Drive SE
Salem, OR 97302-1142
(503) 947-6201
FAX: (503) 947-6330
Internet: www.dfw.state.or.us

May 23, 2025

U.S. Army Corps of Engineers
Portland District, Willamette Valley System EIS
ATTN: Liz Oliver, Project Manager
via electronic mail: Liz.Oliver@usace.army.mil

RE: Cooperating Agencies' Request for Extension of Time

Dear Liz:

Regarding the Scoping Period for the Supplemental Environmental Impact Statement for the Willamette Valley System (WVS-SEIS), the Oregon Department of Fish and Wildlife (ODFW), in coordination with other Cooperating Agencies, respectfully requests an extension of time. An extension, before the process moves to public review and comment, would allow for further conversation between the Corps and the Cooperating Agencies whereby information may be presented, explained, clarified, developed, reviewed, and/or discussed, specifically regarding the analysis of Hydropower Deauthorization and associated potential impact. An extension of at least 30 days, or long enough that a Cooperating Agencies workshop(s) adequately addressing this issue may be held, would greatly benefit the analysis as a whole.

Thank you for considering this request. ODFW appreciates the ongoing dialogue with the Corps on the EIS and related processes.

Sincerely,

Tom Stahl
Deputy Administrator for Inland Fish
Oregon Department of Fish and Wildlife