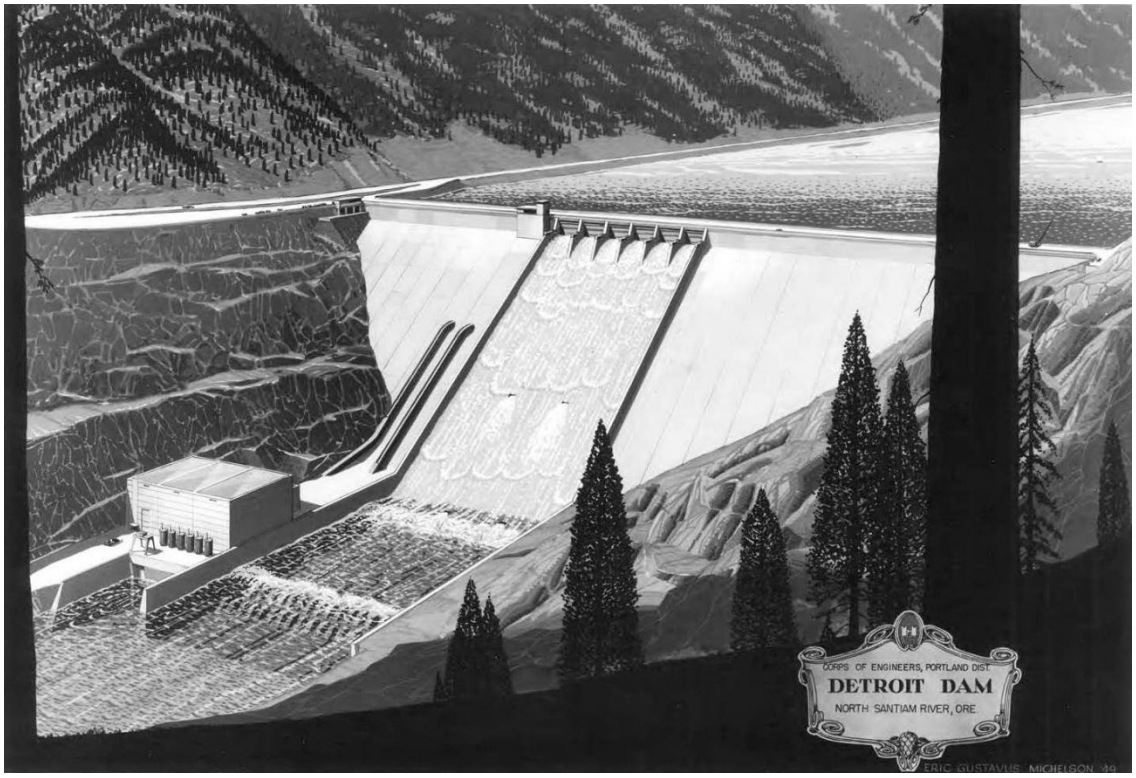
US Army Corps of Engineers®
Portland District

WILLAMETTE VALLEY SYSTEM OPERATIONS AND MAINTENANCE

APPENDIX W: FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT PUBLIC COMMENTS AND RESPONSES

Public Comments and Responses
on the U.S. Army Corps of Engineers
Draft Supplemental Environmental Impact Statement
for Willamette Valley System Operations and Maintenance

Public Comment Period: November 14, 2025 – January 13, 2026



1949 Artist's Rendering

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INTRODUCTION

The U.S. Army Corps of Engineers (USACE), Portland, Oregon District, solicited comments from the public on the Draft Supplemental Environmental Impact Statement (DSEIS) as part of public involvement for the Willamette Valley System Operations and Maintenance Supplemental Environmental Impact Statement. The DSEIS public comment period provided an opportunity for individuals, tribes, and organizations to review and submit comments, questions, and concerns prior to the Final Supplemental Environmental Impact Statement (FSEIS) and USACE decision-making.

USACE published the DSEIS on November 14, 2025, and initiated a 45-day comment period to close on December 29, 2025. Based on public requests to extend the comment period, USACE announced a 15-day extension on USACE Portland District website on December 11, 2025. USACE also provided the extension information to contacts on its public distribution list. The 60-day comment period closed on January 13, 2026.

This appendix presents all public comments received during the DSEIS comment period, along with USACE responses. Each comment letter or email is at the end of the comment and response section. The appendix is formatted to present comments as copied from letters and email correspondences, followed by a USACE response. A comment code and document identifier with a PDF file name were assigned for internal cataloguing purposes.

The comments are in a table format as they were received, without editing or correction, to ensure that the original intent and content of each comment has been preserved. Consequently, some comments may contain spelling, grammatical, or punctuation errors, which were not corrected or altered (except for redacted offensive language). Personal information such as addresses or salutations are omitted.

Comments submitted that contain multiple concerns were separated to represent each, unique concern with an associated response. USACE responses to comments are included after each comment, providing clarification, additional information, and, where applicable, an explanation of how a comment was considered in development of the FSEIS.

Comments and responses on the Draft EIS are in Appendix V, and comments and responses for the Draft Supplemental EIS are here.

PUBLIC COMMENTS ON THE DRAFT SEIS

Commenter Name	Commenter Affiliation	Comment	USACE Response
Mollie Hotchkiss	Independent Citizen	I totally disagree with what you are doing. I live in Lebanon and because you are constantly draining Green Peter Dam, we can no longer use our city water for drinking. You are responsible for that and you need to fix it for us. We should not have to pay to have that fixed. You are so wrong in what you are doing. What about how this affects us as humans? What a mess you have created!!!!	USACE understands that drawdowns can increase turbidity which may adversely affect municipalities and other water purveyors' ability to provide drinking water for communities. Deep drawdowns facilitate the downstream passage of endangered species, which are important natural resources that also warrant consideration. We have seen decreases in downstream turbidity during subsequent deep drawdowns after the first year. We have also seen that timing, duration, and the elevation of a drawdown can reduce turbidity.
Eric Rosso	Independent Citizen	I could literally write a book about why this is a bad idea, and that it should not be done. I'll spare you my authoring it here, only because I feel I do have positive suggestions, that do not include "further" destroying our state economy, or harming our lakes, and do not want to waste them here, and have them received in a negative light. Nonetheless, I would like to contribute my suggestions at the least, and would appreciate a link so that I may comment.	Thank you for your comments. They will be taken under consideration.
Roger Porter	Independent Citizen	The statesman Mail didn't give enough information on how one can attend some of these meetings, unless I just missed it. I'm wondering Where in Salem is the meeting? And where in Detroit will the meeting be? Also if I can go to one of these meetings how can I do the virtual meeting? The posting said: The virtual meetings are at noon and 5:30 p.m. on Nov. 19. In person meetings are in Detroit at 10 a.m. Dec. 6 and in Salem at noon and 5:30 p.m. Dec. 10.	USACE held meetings in the Detroit City Hall, and the Broadway Commons in Salem. The meeting flyer included a link for attending the virtual meetings.
Mark Wigg	Independent Citizen	Have the drawdowns at the other Willamette Reservoirs resulted in more salmon returning? How much spawning habitat is lost when muddy water is released from Detroit? Salmon spawn downstream from the dam and that habitat will be adversely affected.	Here is what USACE observed at other reservoirs. Fall Creek Reservoir: Long-term studies show that full drawdowns have increased returning adult Chinook salmon. This is because the drawdowns help juvenile salmon survive their downstream migration. Green Peter Reservoir: It is too soon to see the results for adult Chinook salmon from the recent drawdowns there. However, USACE confirmed juvenile kokanee salmon that passed through the dam during these operations have returned as adult sockeye salmon after foraging in the ocean. The potential impacts of sediment on downstream spawning habitat are a key consideration in the ongoing monitoring and management of these operations. During the recent deep drawdowns of Green Peter Reservoir, sediment from Green Peter Reservoir largely remained in suspension and was transported below spawning areas.
Mark Wigg	Independent Citizen	How will this project affect the need for the dredging of Detroit Reservoir and are you coordinating with that project?	The marina dredging project at the upstream end of the full pool is a private action. Portland District Regulatory office is coordinating this project; it is outside the scope of the SEIS.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Cheryl Eby	Independent Citizen	For many decades, the dam has been our source of water here in Salem. It has served us well. Ending its use is a senseless act if only to save a few fish. There are surely ways to provide for the fish to get around or through the dam without cutting off our water source here in Salem. So no, do not close down the dam. The cost will be far greater than you can imagine.	USACE is not proposing to remove Detroit Dam. USACE is not eliminating the source of drinking water for the City of Salem.
Corky Porter	Independent Citizen	I'm 74 years old and have lived in Salem all my life. I worked for Marion roads for 40 years. One of the big reasons for the dam is flooding that happened in the valley about every 5 years before the dams. I think the plan which is made up by people who don't live in the valley is very short sighted. And don't look at the people who make a living farming and working in the valley.	Thank you for your comment. We will take it under consideration.
Melody Munger	Independent Citizen	Please listen to my concerns as a citizen of Santiam Canyon: I urge all concerned to stop the Detroit drawdown for the following reasons: 1. To save a few fish, it will kill thousands upon thousands of fish 2. It will negatively impact local tourism businesses who barely scrape by after the catastrophic 2020 wildfires 3. Even with enhanced water quality efforts, downstream water systems will be affected negatively…. And cost millions of dollars. 4. It is a colossal waste of taxpayer money, which could be better spent in many other ways	The Detroit drawdown is included in the National Marine Fisheries Service's *2024 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 BiOp). The Biological Opinion includes the deeper drawdown of Detroit Reservoir unless a different fish passage solution is in place. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams.
Justin Blackmore	Independent Citizen	I am writing in regards to the proposed deep drawdown of Detroit reservoir. The Endangered species act is destroying our lakes throughout the entire state of Oregon. I strongly oppose these drawdowns. These drawdowns are destroying lake fisheries, tourism, fishing and recreation opportunities as well as water quality. I have seen first hand the impact to the lakes after these deep drawdowns have and it makes me sick to see thousands of dead fish and aquatic life destroyed in the name of salmon. Find better fish passage options don't destroying our lakes to help one species.	The WVS dams block access to historical spawning grounds for salmon and steelhead, which are protected under the Endangered Species Act. To prevent the extinction of these species, USACE is legally required to provide a way for them to pass the dams under the 2024 BiOp. The National Marine Fisheries Service determined USACE must act now to avoid causing irreversible harm to threatened salmon populations blocked by the dam. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. USACE recognizes the immediate impacts to kokanee, other resident fishes and associated economic impacts are a serious concern. The plan includes several mitigation measures int he form of avoidance and minimization. To prevent severe turbidity, the drawdown would occur with real-time water quality monitoring to inform operators on whether to stop the drawdown. The timing (late fall/early winter) of the proposed drawdown at Detroit is designed to be less severe on the kokanee population while also maintaining lake levels for boating access above the minimum conservation pool elevation until Labor Day, as hydrology supports. USACE would adjust the operation over time to improve its effectiveness while minimizing negative impacts on the community and the ecosystem.
Justin Blackmore	Independent Citizen	We are faced higher water demands and less snow and rainfall year after year and the water storage we have should be maintained. This will make water less available for everyone by releasing it all down stream and prevent reservoirs having enough capacity to meet everyone's needs.	The drawdown at Detroit would occur during late fall/early winter, just before flood season, when the reservoir is at the minimum conservation pool elevation and there isn't stored water for downstream users.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Justin Blackmore	Independent Citizen	Even better yet manage our marine predators that destroy a huge % of the salmonid populations oh wait the marine mammal protection won't let you..... Fix the real problems don't make another one with these drawdowns.	USACE understands concerns about marine mammal predation on salmon populations. Marine mammal predators are not coming up the Willamette River all the way to the Willamette Valley dams. USACE doesn't have the legal authority to remove these predators downstream of its projects or in the ocean. Currently, passage of juveniles remains the priority.
Paul Harmon	Independent Citizen	Come on, this plan to drain Detroit Lake in Oregon is just another part of the re-wilding agenda. For no good reason, dams and man made lakes and water supplies are "bad", and the Corps of Engineering is being used based on flimsy "endangered species" excuses to eliminate this infrastructure. The expense, the damage to water systems, the potential damage to the dams, is completely unwarranted by any theoretical value to this action. Leave the lake alone. Build more dams with all that money and expertise.	The Detroit drawdown is included in the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. The Biological Opinion requires the deeper drawdown of Detroit Reservoir until a different fish passage solution is in place. Unlike the drawdowns at Fall Creek and Green Peter dams, a large reservoir would remain during the drawdown operation. USACE designed the proposed drawdown of Detroit Reservoir to minimize adverse effects like turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams.
Cindy Kimball	Independent Citizen	I am a citizen of Salem, Oregon. I am also on the board of our Neighborhood Association NEN, where we recently had a presentation about the upcoming Detroit Lake drawdown. After reading more about the 2026 drawdown, I would like to leave my opinion. I prefer that the Army Corp proceed at a more gradual pace with the drawdown. I know there is a projection that the new wells on Garen Island will produce "12 million gallons per day by July", but this might not actually happen. Having experienced the last time when the algae blooms affected our city's water, I would prefer that we not have to go through something similar and go retrieve water for home use in the middle of the cold and wet winter months.	USACE is proposing a step-down approach to Detroit Reservoir drawdown, informed by real time data, until it reaches the target elevation. The data will provide operators with a better understanding of downstream impacts, to determine if the operation should continue in any given year. Additionally, USACE designed the proposed drawdown of Detroit Reservoir to minimize water quality impacts in the North Santiam downstream of Detroit and Big Cliff dams.
Karen Heuberger	Independent Citizen	Corps: I strongly oppose the proposed reservoir drawdown of Detroit Lake. The purported reason for this drawdown is to help salmon. The biggest help to salmon/salmon recovery from declining populations: Is to drastically reduce the number of predators feasting on salmon. The overpopulation of seals, sea lions, and other predators, who are currently protected, is the major factor in declining salmon numbers. Use common sense! Open up seal/sea lion hunting to sportsmen/sportswomen, pay a bounty, Then use the protein from these animals for incarcerated people. A win/win for taxpayers and human population. Native populations ate these animals; we honor native customs and traditions in current culture.	USACE understands your concern about marine mammal predation on salmon populations. Marine mammal predators are not coming up the Willamette River all the way to the Corps projects. USACE doesn't have the legal authority to remove these predators downstream of its projects or in the ocean. Currently, passage of juveniles remains the priority not the management predators.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Karen Heuberger	Independent Citizen	This proposed drawdown will wipe out the kokanee fisheries. It will dramatically decrease recreational use/the area economy. It will likely have horrible impact upon water quality and municipal water systems.	USACE expects an impact on the kokanee fishery, but the extent is uncertain. To reduce the impact, the proposed Detroit drawdown is scheduled for late fall/early winter when the fish are more spread out and the summer recreation season has ended. Future fishing opportunities would depend on a combination of natural reproduction and stocking rates, which are managed by ODFW. USACE would also implement the drawdown in phases, gradually reaching the target elevation over several years to minimize impacts on water quality and downstream facilities. If implemented, USACE would continuously monitor water quality including turbidity (muddy water) to inform operators as to whether to continue the drawdown each year.
Karen Heuberger	Independent Citizen	Please learn the lessons from the disaster that this caused with the recent Green Peter Reservoir drawdown. Please do not repeat this mistake at Detroit Lake. I appreciate your consideration in this matter.	The Detroit drawdown is included in the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. The Biological Opinion requires the deeper drawdown of Detroit Reservoir until a different fish passage solution is in place. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats. USACE assessed elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.
Shannan Burger	Independent Citizen	I'm a local Salemite. Been living in Salem for 20+ years. I'm originally from Grand Rhond Oregon. Born and raised fishing salmon river and Tillamook. My family has been going to Detroit each summer since i can remember. All of that just to say: I approve of the plan to drain down Detroit lake. The salmon are such an essential part of our community and we need to make ever effort to help them thrive in this world. Its most assuredly worth trying. Especially since other dams across Oregon have done the same and have been successful!	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Steve Frank	Independent Citizen	The Upper and Lower Bennett Dams on the North Santiam River provided numbers of adult fish returning to the North Santiam River. The purpose of the proposed drawdown will be enhanced by the Dams fish counting. Unfortunately, they've been taken offline. Will this be reinitiated to assist in determining the effectiveness of the drawdown?	Oregon Department of Fish and Wildlife (ODFW) manages the fish counters at the Bennett Dams, and USACE cannot confirm if they will be reactivated. Rotary screw traps and other methods are commonly used to assess downstream fish passage. USACE would continue to count returning adult salmon continue upstream at the Minto Adult Fish Collection Facility. These counts are essential as they track fish originating from above Detroit Dam, which will allow USACE to evaluate the drawdown's success in passing juvenile salmon downstream of the dam.
Eric Rosso	Independent Citizen	Why are you trying to destroy our lakes? All you're doing is crippling Oregon's economy. It's not bringing back Chinook. It's not bringing back Steelhead. It's not improving native Trout populations. So WHY ARE YOU CONTINUING TO DO THESE DRAW DOWNS???? THEY ARE NOT HELPING! You already destroyed one of the biggest revenue draws my area when you destroyed Fall Creek by draining it! You've done these drains to Fall Creek for 20 years! It only takes 4-6 years for Chinook to go from egg to returning adult. 20 YEARS! Where is the run? We get a few hundred Chinook, and a few thousand steelhead (nowhere near enough justification to continue this policy) which is DRAMATICALLY FEWER FISH THAN YOUR PREVIOUS POLICIES WERE PRODUCING! WHAT THE HELL???? When I try to do something, and it produces THE EXACT OPPOSITE RESULT of what I was trying to achieve, I STOP DOING IT! What metric of failure will make you stop? When we stop buying fishing licenses? When you've extincted the last Chinook run in Oregon? WHEN ARE YOU GOING TO STOP????	The WVS dams, including Fall Creek, block access to historical spawning grounds for salmon and steelhead, which are protected under the Endangered Species Act. To prevent the extinction of these species, USACE is legally required to provide a way for them to pass the dams, under the 2024 BiOp. The drawdown at Fall Creek has been proven to be the most effective method for ensuring juvenile salmon survive their downstream migration. While this has unfortunately come at the cost of the resident fishery, the data shows this operation has increased adult salmon returns over time compared to pre-drawdown conditions. The recent declines in returning fish to Fall Creek are not a result of the drawdown policy. These declines are attributed to factors outside of river operations, such as poor ocean conditions and significant habitat damage from recent wildfires, which have impacted salmon runs across the region.
Dawn Tedder	Independent Citizen	The drawdown will have a negative impact on community water resources below the dam potentially causing microbes and chemicals into public drinking water. The mud could also clog those water systems requiring millions [to] repair and at a time where taxpayers are stretched thin from the high cost of everything! There is also no guarantee it will help fish populations after the drawdown!! I plead with you to cancel this to protect the communities that will impacted by this.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats due to the deep elevation of the drawdown. USACE assessed elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Emily Giordono	Independent Citizen	I would like to express support for alternative 6 or alternative 2A in the Draft Supplemental Environmental Impact Statement. I think migratory fish, which have been consistently ignored by the ACOE during their Willamette Valley operations, should be prioritized by any dam regulation/modification decisions going forward. Also, you should unchannelize the Long Tom and drain Fern Ridge. I think the watershed has a lot of potential as a wildlife area if it were reconnected with its historic floodplain. I know this is not in the EIS but I also think upstream adult fish passage and ideally volitional upstream passage should be built at every location where it does not currently exist.	USACE's proposed fish passage actions are focused on the river basins that historically supported populations of protected salmon and steelhead populations, which does not include the Long Tom watershed. However, the alternatives do include measures to improve river access for other native fish in that area. Upstream passage is critical. A component of the proposed alternatives is the construction of the improvement of existing facilities and the construction of a new facility at Green Peter, to collect and transport adult fish upstream of the WVS dams to the watersheds they historically occupied.
David Blessman	Independent Citizen	Please prioritize humans over animals in your decisions. To reduce electricity generation at a time when electricity demand is projected to increase reveals a flaw in the decision process. Please include the recent changes to the endangered species act such as the end of "blanket" protections and the changed definition of "harm." These changes support sustaining the Willamette Basin power generation as is; i.e. no changes to generation and no draw down. Please stop making large system changes by response to lawsuits. Those who prioritize animals over humans use lawfare because rational animal over human arguments fail. Please keep producing electricity by the dams and please do not draw down the lakes. Flood control and power generation must be the priorities. Request: please add my email to your distribution list.	Thank you for your comments. They will be taken under consideration.
Georgia Platts	Independent Citizen	I am writing with regard to the proposed Detroit drawdown. The drawdown was approved before climate change had threatened us with greater fires and drought. A yearly drawdown risks threatening our drinking water supplies and our ability to fight wildfires. At this point, it is too risky to draw the lake down to nothing when it may not fill up again. Too many lives are at stake in the quarter-million metro area.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats due to the deep elevation of the drawdown. USACE assessed elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Debbie Dixon	Independent Citizen	Comment on Detroit Dam - Leave it alone! You don't realize how much damage you would do, over a fish	The Detroit drawdown is included in the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. The Biological Opinion requires the deeper drawdown of Detroit Reservoir until a long-term fish passage solution is in place.
Michael Taylor	Independent Citizen	I am submitting this comment to express strong concern over the proposed deep drawdown at Detroit Reservoir beginning in 2026. I believe it is far too late to address our endangered salmon and steelhead runs - these were decimated when we over logged our mountains and built dams. Your current plan creates major, clearly quantifiable risks to the Detroit community with no proven long-term benefit to adult fish returns.	The proposed drawdown is a requirement of the 2024 Biological Opinion issued pursuant to the Endangered Species Act (ESA). The North Santiam River's spring Chinook salmon and winter steelhead are listed as threatened, and the dams block access to their essential spawning habitat. Federal wildlife agencies have determined that continuing to operate the dams without providing fish passage risks the extinction of these species. Therefore, to comply with the ESA, USACE must provide passage for these fish. The drawdown could be an interim action until a different downstream passage solution is operational.
Michael Taylor	Independent Citizen	Significant Negative Impact on the Community and Local Economy • Detroit's economy depends on year-round recreation, not just summer. • Marion County's own strategic planning documents show that for each foot the reservoir drops, visitation declines roughly 2%, with clear financial losses to local businesses and homeowners. •A deep drawdown removes late-fall, winter, and early-spring fishing — periods where anglers and recreationists still actively use the lake and support local businesses.	USACE updated Appendix K Recreation, Figure 1-2 through Figure 1-6 to show year-round water levels under different precipitation scenarios and updated Section 2.1.1 to include winter recreation.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michael Taylor	Independent Citizen	Loss of Recreational Opportunity •Winter and early-spring fishing at Detroit is consistently productive; many stocked fish remain available throughout these seasons. •Closing access during these months will severely harm guides, marinas, small stores, lodging, and second-homeowners who rely on continued lake activity.	USACE recognizes the impacts to winter and early spring fishing are a serious concern, including the associated economic impacts to communities that rely on these resources. Taking action for fish passage at Detroit is not discretionary, it is a legal requirement under the Endangered Species Act. The Detroit drawdown is included in the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. The Biological Opinion requires the deeper drawdown of Detroit Reservoir until a long-term fish passage solution is in place. A phased, gradual implementation would occur for the proposed deeper drawdown of Detroit. Although there could be significant impacts to the kokanee fishery, a late-fall drawdown would help reduce impacts on both the kokanee fishery and the peak summer recreation season, thereby reducing economic disruption. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure is based on model results and does not show how real-time water management can minimize negative effects to reservoir elevations. The drawdown would occur when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill.
Michael Taylor	Independent Citizen	Water Quality and Infrastructure Risks •Downstream communities (e.g., Stayton) have already voiced concern about sediment pulses, muddy water, and treatment challenges during drawdown periods. • Extremely low water exposes safety hazards, creates unstable lakebed areas, and complicates emergency access.	Thank you for your comments. They will be taken under consideration.
Michael Taylor	Independent Citizen	Lack of Hard Evidence That Deep Drawdowns Improve Adult Fish Returns • The Corps itself has acknowledged that while juvenile passage may improve during drawdowns, there is no clear evidence yet that these actions lead to meaningful increases in returning adult salmon or steelhead. •Comparable experiments in other Willamette reservoirs (e.g., Green Peter and Lookout Point) show mixed results and in some cases significant ecological trade-offs (kokanee kills, heavy turbidity, and downstream impacts). •Long-term benefits remain theoretical, while community harm is certain and immediate.	A phased, gradual implementation would occur for the proposed deeper drawdown of Detroit. Although there could be significant impacts to the kokanee fishery, a late November/early December drawdown would help reduce impacts on both the kokanee fishery and the peak summer recreation season, thereby reducing economic disruption.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michael Taylor	Independent Citizen	Need for Alternatives and a Balanced Approach I urge the Corps to: •Delay any new deep-drawdown until the SEIS is completed and until clear, peer-reviewed evidence shows adult-return benefits. • It is sad to say, but our native salmon and steelhead will never recover to a point they were before the dams or aggressive logging practices were put in place. We should not sacrifice Detroit lake now for the sins of the past. Do the right thing - stop the drawdown plan and enhance what we have.	The Detroit drawdown is included in the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. The National Marine Fisheries Service determined that action is required to improve passage and access to habitat above Detroit Reservoir to avoid causing irreversible harm to threatened salmon and steelhead populations, until the long-term proposed plan for a structural downstream fish passage system at Detroit Dam is funded and completed, which would trap the juveniles and smolts and truck or bypass them below Big Cliff Dam. A phased, gradual implementation of the proposed deeper drawdown of Detroit with constant water quality monitoring would reduce the risk of releasing high turbidity water downstream. Although there could still be significant impacts to the kokanee fishery, a late-fall drawdown would help reduce impacts on the peak summer recreation season, thereby reducing economic disruption.
Michael Taylor	Independent Citizen	•Fully quantify economic, recreational, and safety impacts in the final analysis.	A detailed analysis of recreation impacts can be found in Appendix K of the SEIS. Appendix K of the SEIS analyzes changes in recreational visitation under each alternative compared to the no action alternative and changes in the value of recreational opportunities under each action alternative compared to the no action alternative.
Eric Rosso	Independent Citizen	Can you tell me what the rationale is behind drawing Lookout Point so low? It's at least 70 feet lower than it normally is this time of year. Why are you preventing it from filling to it's former low-pool in the winter?	USACE was required to complete a fall drawdown for fish passage as part of a 2021 injunction in response to *NEDC v. USACE* lawsuit. This drawdown is part of the Interim Operations described in the SEIS and proposed to occur each year until a different downstream fish passage measure is in place.
Alex Chase	Independent Citizen	I submit this comment as a resident of Eugene, Oregon, a community deeply connected to the Willamette River system, and as a current candidate for Governor of Oregon who has a responsibility to consider the long-term environmental, economic, and public-safety impacts of decisions affecting our state. Oregonians understand that our dam system exists to balance multiple public interests: flood control, environmental stewardship, fish recovery, water quality, hydropower generation, recreation, and regional economic stability. Any changes to dam operations must respect that balance and avoid solving one problem by creating several others.	USACE analyzed all alternatives in the Final and Supplemental EIS for effects to all project authorizations including flood risk management, hydropower, recreation, irrigation, municipal and industrial water supply, fish and wildlife, water quality, and navigation.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Alex Chase	Independent Citizen	I support science-based measures to protect and recover endangered fish species, including improved passage and habitat restoration. However, I am deeply concerned by proposals that move toward eliminating hydropower as an authorized purpose at Willamette Valley dams without first presenting clear, enforceable alternatives to replace that lost clean energy, operational resilience, and grid stability. Hydropower is not incidental to these facilities — it is a public asset that contributes to energy reliability, affordability, and emissions reduction.	Thank you for your comment.
Alex Chase	Independent Citizen	As Oregon faces increasing wildfire risk, climate volatility, and the looming threat of a Cascadia Subduction Zone earthquake, dam infrastructure must be evaluated not only for environmental outcomes, but for systemwide resilience. Reducing hydropower capacity may paradoxically increase dependence on fossil fuels while weakening our ability to respond to emergencies that require reliable electricity and controlled water management.	Dam safety and resilience studies are outside of the scope of this effort but are ongoing for the Willamette Valley Projects. Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects.
Alex Chase	Independent Citizen	Changes such as deeper reservoir drawdowns must also be evaluated for their downstream impacts on water quality, sediment disturbance, municipal drinking water, recreation-based local economies, and community trust. Cities like Eugene, Salem, Albany, Corvallis, and Portland all depend on the careful operation of this system.	The SEIS evaluates the effects to the human and natural environment, and would take those effects into consideration when selecting an operating plan for implementation.
Alex Chase	Independent Citizen	I urge the Corps to: 1. Fully disclose the energy, cost, and reliability impacts of hydropower removal, including who bears those costs. 2. Ensure that fish recovery goals are paired with infrastructure modernization, not infrastructure degradation. 3. Commit to meaningful coordination with local governments, tribes, utilities, emergency planners, and the public before irreversible decisions are made. 4. Prioritize solutions that preserve flood control, clean energy, and environmental restoration together, rather than treating them as competing objectives. Oregon deserves integrated, future-focused leadership on water and energy policy. Decisions made today will shape our economy, environment, and safety for generations. I strongly encourage the Corps to proceed cautiously, transparently, and collaboratively — and to reject any path that weakens Oregon's resilience under the guise of progress.	The effects associated with Alternative 6, Ceasing Federal Hydropower Operations, including cost, are in Chapter 3 of the SEIS. Congress would decide who bears the cost, thus USACE did not speculate in SEIS. USACE has completed all the requisite public notice and comment required by NEPA in addition to a significant amount of outreach outside of the NEPA process relating to its operations and maintenance activities.
Dave White	Independent Citizen	However on 11/14/2025 and 11/21/2025 the US Supreme Court denied all writs except one for President Trump by Kristy Noem. These two dates the Supreme Court had a little over 100 dockets to adjudicate. Confirming with the head clerk, the Supreme Court denied all because the sheer number was too great to adequately adjudicate them. They are therefore waiting to see which docket's have Rule 44 rehearing's filed in them. No legal or scientific reason to remove any dam. Fish ladder s work. The sea lions are the almost 1:1 ratio to the decline of the salmon in the Columbia river. Our salmon protection device attached to the down stream fish ladders will fix declining salmon runs within seven years, salmonprotectiondevice.com 503-608-7611 x602 Reality is that which when taken away still exists. See Attachment which is a copy of the commentors Extraordinary Writ of Prohibition, Mandamus by Rule 20 David C White v FERC in the Supreme Court of the US	USACE built the WVS dams without fish ladders, with the exception of Green Peter, and installation of fish ladders would be ineffective given the height of these high head dams. USACE is very effective in moving fish above the dams via trap and haul operations at its adult fish facilities. The most limiting factor in fish passage is moving juveniles' safely downstream. The EIS is evaluating how to move juvenile listed species safely downstream while continuing to operate and maintain the adult fish facilities that more fish upstream.

Commenter Name	Commenter Affiliation	Comment	USACE Response
N/A	Marion County Board of Commissioners	The Marion County Board of Commissioners writes to request an extension of the public comment period for the U.S. Army Corps of Engineers' Supplemental Environmental Impact Statement (SEIS) regarding operations of the Detroit Dam within Oregon's Willamette Valley System. The draft SEIS was released on November 14, with the current comment period set to close on December 29. Given the scope, complexity, and potential impacts of the proposed operational changes, we request an additional 45-day extension to ensure that local governments, public agencies, Tribal partners, utility providers, business owners, and the general public have adequate time to meaningfully review and comment on this document.	USACE extended the end of the comment period from December 29, 2025 to January 13, 2026.
N/A	Marion County Board of Commissioners	The draft SEIS outlines operational alternatives that could result in extraordinary impacts across Marion County and the broader Santiam Canyon. Prior deep drawdowns at other Willamette Basin reservoirs have already demonstrated the seriousness of these risks, including severe turbidity events, substantial disruptions to drinking water systems, and economic losses for surrounding communities. Detroit Reservoir directly supports drinking water supplies for more than 200,000 downstream residents, sustains recreation and tourism-based economies, and supports critical fisheries and habitat. Any operational changes that affect water quality, availability, or timing of releases will have profound consequences. For a SEIS with implications of this magnitude, touching drinking water safety, environmental stewardship, public health, infrastructure operations, and the economic resilience of rural communities, it is essential that Oregonians have a meaningful opportunity to participate. Extending the comment period is in the public interest and will help ensure that the Corps receives the full breadth of input necessary to support a well-informed and transparent decision making process. Accordingly, we respectfully request that the U.S. Army Corps of Engineers extend the SEIS public comment period by an additional 45 days. Thank you for your attention to this matter and for your continued collaboration with Oregon communities. We look forward to working together to ensure that the management of the Willamette Valley System protects endangered species while also safeguarding the needs, safety, and well-being of the people of Marion County and the broader region.	USACE extended the end of the comment period from December 29, 2025 to January 13, 2026.
Logan Rutherford	Independent Citizen	Hydropower should not be removed as a requirement. These drawdowns should not be allowed!!!	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Wenona Given	Independent Citizen	Living downstream from Foster and Green Peter and seeing the devastating effect it has had on the community of Sweet Home the draw downs need to be stopped. Managing an entire ecosystem for one or two species jeopardizes additional species. As far as hydro power is concerned if we take out those components where is the additional electricity going to come from. We live during a time when electricity demands are greater than ever. If anything The drawdowns have killed the summer lake activities for Green Peter. The lack of fish in both lakes has made it to where sweet home is no longer a place for anglers to come. Causing harm to local businesses throughout town. Doing a deeper draw down on Detroit could kill an additional areas fishing industry. The mass die off events with Kokanee should be considered in these deep draw down scenarios.	Lessons learned from the Foster and Green Peter drawdowns were used to inform the timing, elevation, and duration of the Detroit drawdown to mitigate adverse effects. The Detroit drawdown is included in the 2024 *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 under the authority provided to the National Marine Fisheries Service by the Endangered Species Act*. The Biological Opinion requires the deeper drawdown of Detroit Reservoir until a different fish passage solution is in place. The effects on other resources, both human (electricity, recreation, etc.) and natural (kokanee) have been evaluated and will be considered when selecting a plan for implementation.
Jayson Reedy	Independent Citizen	Deep draws are ruining water quality, eroding lake bed, destroying fish populations and recreation for the people who frequent these lakes. We are worrying about salmon smolt that can't even run up these waters because there's no ladder and in process destroying everything else	Lessons learned from the Foster and Green Peter drawdowns were used to inform the timing, elevation, and duration of the Detroit drawdown to mitigate adverse effects. The Detroit drawdown is included in the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. The Biological Opinion requires the deeper drawdown of Detroit Reservoir until a different fish passage solution is in place. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. The Final EIS and Supplemental EIS analyze impacts to water quality, fisheries and recreation (Appendix D, Appendix E and Appendix K).

Commenter Name	Commenter Affiliation	Comment	USACE Response
Corrie Fountain	Independent Citizen	As a lifelong resident of the Willamette Valley, I feel obligated to comment on the upcoming study and possibility of removing hydropower as an authorized use for the dams. I would assume that would mean the gates would be open unless used for flood control and no reservoir would exist. First and foremost, stop prioritizing fish over people. I love the outdoors, I love fishing, I respect and value nature and the ecosystem. I, however, cannot comprehend how we are even discussing dropping hydropower from these dams. Oregon's carbon footprint is one of the lowest in the US because we use hydropower as one of our primary resources to provide necessary electricity. I haven't looked at the recent reports about on how much our locals dams provide, but the last time I had looked, Green Peter had provided a reasonable amount for our local towns. The town I grew up in. The town my kids will grow up in. I have a vested interest in what happens in our valley. When Green Peter was drained, I watched our city water turn brown. It smelled so bad of chlorine you might as well have gone out to your backyard pool for a drink. I watched thousands of Kokanee die. I watched habitat for bald eagles and osprey be destroyed. I watched little towns lose revenue from lost recreation (as if Sweet Home hadn't had enough after the spotted owl debacle.) I watched one of the most beautiful corridors in our state turn into a barren wasteland of mud and silt, fish beds covered in it. We have to stop letting private interest conservation groups dictate the priorities for our towns from their million dollar homes in some far away city. I want to see salmon flourish, but I cannot and will not prioritize that over basic human necessity. Wind power is a joke. People roll over in their graves when we even discuss nuclear power. Coal? You know the answer to that one. And now we are going to talk about eliminating hydropower from Willamette valley dams? Then saying "drive electric cars!" In the same sentence? It's time common sense supersedes agendas.	USACE evaluated ceasing hydropower operations at the WVS projects because Congress passed a provision in the Water Resources Development Act (WRDA) 24 requiring this analysis. Under this alternative, USACE would continue to operate the reservoirs for multiple purposes, so they would still be refilled for they other conservations purposes like water quality, irrigation and municipal and industrial water supply.
William Little	Independent Citizen	Do not remove any dams in the Columbia basin including the Willamette Valley dams. These are vital for producing electricity. Enhancing them for fish passage is fine. Upgrading for earthquakes is fine. Don't waste our money.	USACE is not considering dam removal in the SEIS for the Willamette Valley System. USACE analyzed ceasing hydropower operations while continuing to operate for flood risk management, recreation, irrigation, municipal and industrial water supply, fish and wildlife, water quality, and navigation.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Alvin Klausen	Marion County	My name is Alvin Klausen, and I serve as the Government Relations Manager for Marion County, Oregon. I am writing on behalf of the Marion County Board of Commissioners to share the attached letter regarding the U.S. Army Corps of Engineers' Supplemental Environmental Impact Statement (SEIS) for operations of the Detroit Dam within the Willamette Valley System. In the attached correspondence, the Board respectfully requests a 45-day extension of the current public comment period. Given the complexity of the SEIS, the significant potential impacts of proposed operational changes on communities across Marion County, and the fact that the existing comment window falls largely during the holiday season, our Board believes additional time is essential to allow meaningful public, local government, and stakeholder review. We appreciate your consideration of this request and your ongoing work with Oregon communities on these important issues. Please feel free to contact me if you have any questions or would like to discuss our request further.	USACE extended the end of the comment period from December 29, 2025 to January 13, 2026.
Gary Kintz, Michelle Connor, Michele Ray	Independent Citizen	I am writing with urgency and deep concern regarding the U.S. Army Corps of Engineers' proposed deep drawdown of Detroit Lake. This proposal poses a direct and immediate threat to our region 's water quality, environmental stability, public safety, and economic recovery. The impacts of such a drawdown are not theoretical- they are inevitable, severe, and cannot be reversed once set in motion. Here's what is at stake:	Thank you for your comment. We will take it under consideration.
Gary Kintz, Michelle Connor, Michele Ray	Independent Citizen	Water Security for Thousands Turbid, unstable water flows will overwhelm treatment plants in the Santiam Canyon and the Willamette Valley, including the City of Salem's drinking water intake. A drawdown during critical recharge months puts entire communities at risk of water shortages and utility disruptions.	The deep drawdown would occur during the late fall/early winter, outside the refill period. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats. USACE assessed elevation of the drawdown, and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify or cease the operation to improve conditions for fish and reduce adverse impacts that may occur.
Gary Kintz, Michelle Connor, Michele Ray	Independent Citizen	Climate Conditions Have Changed - So Must Our Strategy Detroit Lake is no longer filling like it once did. Wildfires have stripped away snowpack shade, leading to earlier, faster runoff that is not being captured. The current fill curve is dangerously outdated and ignores the reality of prolonged drought and reduced spring rainfall.	Updating the rule curve is beyond the scope of the SEIS. Studying changes to the rule curve would impact USACE's flood control mission due to posing an unacceptable risk to life safety, thus were screened out from consideration as part of this effort.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Gary Kintz, Michelle Connor, Michele Ray	Independent Citizen	Increased Wildfire Danger With hotter, drier summers and reduced snowpack, wildfire threats are escalating. A full reservoir is a frontline defense, providing essential firefighting water resources. A drawdown removes this safety net.	The drawdown would occur during the late fall and early winter, when the reservoir is already lowered for flood risk operations. The drawdown operation would end about one month before the normal refill season in February and outside of fire season (typically June through October). Even during the drawdown, a large pool would remain and be available for firefighting operations.
Gary Kintz, Michelle Connor, Michele Ray	Independent Citizen	Economic Devastation Canyon communities like Detroit, Idanha, Gates, and Mill City are still rebuilding from the 2020 wildfires. Local businesses rely on a full lake to survive the summer season. Drawing down the lake will deal a crushing economic blow to already fragile local economies.	USACE updated Appendix K Recreation to show year-round water levels at Detroit Reservoir under different precipitation scenarios (Figures 1-2 through 1-6). The deep drawdown would occur during the late fall/early winter, outside the refill period. During extremely dry years, the drawdown may have lasting effects into summer if there isn't enough rainfall to refill the reservoir. Under current operations, USACE may not refill Detroit reservoir during dry years, as reservoir refill depends on late winter and spring rains.
Gary Kintz, Michelle Connor, Michele Ray	Independent Citizen	Collapse of Local Fish Species The proposed drawdown doesn't just impact salmon - it puts kokanee and other species at risk of total collapse. We've already seen this happen at Green Peter. We cannot allow Detroit Lake to become the next casualty.	The local kokanee fishery at Green Peter Reservoir has experienced significant losses due to the deeper reservoir drawdowns. Studies from Green Peter have confirmed that the drawdown was effective at improving downstream passage and survival for juvenile Chinook salmon, which is the primary goal of the proposed action at Detroit. Significant impacts may also occur for kokanee in Detroit Reservoir with the proposed fall drawdown. The plan for Detroit has been designed to learn from Green Peter deep drawdowns. Key differences include: Timing: The drawdown is scheduled for late fall, when the water is cooler and kokanee are more widely distributed, reducing the risk of a mass casualty event. Scale: The drawdown would be less extreme than what occurred at Green Peter, leaving a larger portion of the reservoir intact. While impacts to the kokanee population would occur, these measures are expected to reduce impacts in comparison to those observed at Green Peter.
Gary Kintz, Michelle Connor, Michele Ray	Independent Citizen	This isn't just a Detroit Lake issue. All of Western Oregon is at risk. Our water infrastructure depends on smart, stable, climate-aware reservoir management. A move this drastic sets a dangerous precedent for the entire state. I strongly urge the U.S. Army Corps of Engineers to halt this proposed drawdown immediately and prioritize solutions that reflect the realities of today's climate, wildfire risks, and community needs. Additionally, I support the request for a 45-day extension to the public comment period to ensure full community engagement. This is a defining moment for the future of water management in Oregon. We need your leadership and responsiveness now more than ever.	Thank you for your comments. We will take it under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Gary Kintz	Independent Citizen	We have recreated on Detroit Lake for over 40 years and this drawdown would be detrimental to our lake community. We lost our home in the 2020 Detroit wildfires and struggled to rebuild. We cannot sustain another major catastrophe in our area. I highly condemn and discourage this action and do not support it!	Thank you for your comment. We will take it under consideration.
Dave White	Independent Citizen	As of November 3rd 2025 No Dam in the USA or its territories may be removed or have its turbines removed without specific permission of salmonprotectiondevice.com The 2008 and 2024 Biological Opinions are junk science and void. https://salmonprotectiondevice.com/Dam_Removal_Applicat https://salmonprotectiondevice.com/Dam_removal_Approval_Procedure.pdf https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25-5808.htmlNov 06 DISTRIBUTED for Conference of 11/21/2025. Nov 03 2025 Waiver of right of respondent FERC to respond filed. Therefore on 11/21/2025 the U. S Supreme Court will grant the writ and by Rule 20 they must adjudicate it by 12/3/2025. They may No legal or scientific reason to remove any dam. Fish ladders work. The sea lions are the almost 1:1 ratio to the decline of the salmon in the . Our salmon protection device attached to the downstream fish ladders will fix declining salmon runs within seven years, salmonprotectiondevice.com 503-608-7611 x602	Thank you for your comments. They will be taken under consideration.
Multiple [1]	Independent Citizen	Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Willamette Valley System. I'm writing to support actions that meaningfully improve conditions for wild, native salmon and steelhead in the Willamette River Basin. I specifically support the annual fall deep drawdown at Detroit Reservoir, and I urge the Corps to strengthen and expand the alternatives it considers in the SEIS.	Thank you for your comments. They will be taken under consideration.

[1] Several individuals submitted the same comment: Phil Kirkland, Kenneth Walker, Albert Wei, Scott Sisamis, Cynthia Chen, Mike Brinkley, Brendan Maloy, Clifford Oakley, Brian Oliver, Bryan Mullaney, Ann Hollyfield, Luke Schultz, Walter Tingle, Brian Emerick, Dale Bundy, Jim Coverdell, Jen Matthews, Chris Sheline, Nick Stewart, Douglas Rohn, Nick Parish, Chris Daughters, Chuck Gehling, Peter Murray, Debra Abbott, Kristine Green, Alan L'Hommedieu, Laurel Williams, Joseph Welch, Jordan Farina, Erick Petersen, Sean Brady, Barrett Edgar, Duncan Kerst, Stephen Oder, Teresa Morehouse, Karen Erde, Steve Baker, Jacob Young, Peter Brewer, Sean Bistoff, Bryan Mullaney, Richard Curtis, Noah Jenkins, Steven Novotny

Commenter Name	Commenter Affiliation	Comment	USACE Response
Multiple [2]	Independent Citizen	1. Support the Deep Drawdown at Detroit Reservoir I strongly support the Corps' proposal to draw down Detroit Reservoir each fall to improve downstream passage for juvenile fish. This is one of the most effective operational tools available to help spring Chinook and winter steelhead survive their migration to the ocean. The Corps' proposed three-year phased approach to gradually deepen the drawdown is a smart, science-based strategy to reduce downstream sediment and water-quality impacts. Please continue prioritizing this measure, refine it with the best available science, and ensure it becomes a consistent annual practice.	Thank you for your comments. They will be taken under consideration.
Multiple [3]	Independent Citizen	2. The Corps' Alternative 6 Falls Short of What Congress Intended By analyzing only one "no-hydropower" alternative, the Corps has limited the public's ability to understand what's truly possible for fish recovery. Alternative 6 removes all hydropower infrastructure but keeps the same costly and likely ineffective fish-collection facilities from the preferred alternative. This does not reflect the full range of options Congress expected when it required the Corps to study ending commercial hydropower in the Willamette system. What's missing is a dam-by-dam analysis of other viable approaches—such as leaving hydropower infrastructure in place but no longer generating commercial power. Without these options, decision-makers and the public don't have the information needed to choose a plan that will actually help native fish recover.	Congress passed a provision in WRDA 24 that required USACE to formally analyze "an alternative that ceases hydropower operations at the [WVS] projects." This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. This alternative was analyzed in addition to the eight other alternatives, providing a reasonable range of alternatives.

[2] Several individuals submitted the same comment: Phil Kirkland, Kenneth Walker, Albert Wei, Scott Sisamis, Cynthia Chen, Mike Brinkley, Brendan Maloy, Clifford Oakley, Brian Oliver, Bryan Mullaney, Ann Hollyfield, Luke Schultz, Walter Tingle, Brian Emerick, Dale Bundy, Jim Coverdell, Jen Matthews, Chris Sheline, Nick Stewart, Douglas Rohn, Nick Parish, Chris Daughters, Chuck Gehling, Peter Murray, Debra Abbott, Kristine Green, Alan L'Hommedieu, Laurel Williams, Joseph Welch, Jordan Farina, Erick Petersen, Sean Brady, Barrett Edgar, Duncan Kerst, Stephen Oder, Teresa Morehouse, Karen Erde, Steve Baker, Jacob Young, Peter Brewer, Sean Bistoff, Bryan Mullaney, Richard Curtis, Noah Jenkins, Steven Novotny

[3] Several individuals submitted the same comment: Phil Kirkland, Kenneth Walker, Albert Wei, Scott Sisamis, Cynthia Chen, Mike Brinkley, Brendan Maloy, Clifford Oakley, Brian Oliver, Bryan Mullaney, Ann Hollyfield, Luke Schultz, Walter Tingle, Brian Emerick, Dale Bundy, Jim Coverdell, Jen Matthews, Chris Sheline, Nick Stewart, Douglas Rohn, Nick Parish, Chris Daughters, Chuck Gehling, Peter Murray, Debra Abbott, Kristine Green, Alan L'Hommedieu, Laurel Williams, Joseph Welch, Jordan Farina, Erick Petersen, Sean Brady, Barrett Edgar, Duncan Kerst, Stephen Oder, Teresa Morehouse, Karen Erde, Steve Baker, Jacob Young, Peter Brewer, Sean Bistoff, Bryan Mullaney, Richard Curtis, Noah Jenkins, Steven Novotny

Commenter Name	Commenter Affiliation	Comment	USACE Response
Multiple [4]	Independent Citizen	3. Expand the Analysis of What Is Possible Without Commercial Hydropower The Draft SEIS does not fully examine the range of options that become available if commercial hydropower is removed from Willamette Valley dams. Since Congress has required the Corps to analyze a “no hydropower” alternative, the final SEIS should explore more than one narrow version. Please expand the “no hydropower” analysis to consider the full suite of fish-focused options, including: -More flexible and seasonally variable drawdown schedules -Additional deep-drawdown opportunities at other reservoirs -A wider range of flow and temperature management strategies -Removal or alternative operations like run of river of reregulating dams, which exist solely to support hydropower production and impede fish recovery	WRDA 24 directed USACE to evaluate an alternative that ceases hydropower operations. The language did not instruct USACE to analyze ceasing operations for the other authorized purposes. All the reregulation dams - Big Cliff, Dexter and Foster - have multiple purposes so their operations are not solely limited to hydropower (Appendix S Table 4-1. Congressionally Authorized Purposes of the Willamette Valley System). WRDA 24 did not require USACE to analyze the removal of any of the projects. USACE screened dam removal measures and alternatives for the reasons stated in Chapter 2 and Appendix A. The eight alternatives in the FEIS provided a reasonable range of alternatives meeting the requirement of NEPA. The analysis of the ninth alternative, required separately by Congress, confirmed USACE’s understanding that refilling for the conservation purposes, irrigation, water supply, and water quality (not hydropower) is what limits operations for improved fish passage. Alternatives 3A and 3B analyzed a wide range of operations that impacted hydropower and the purposes met by the conservation pool, including spring and fall drawdowns and delayed spring refills at the projects. Modeling showed operations were generally less effective at passing listed species downstream as compared to structural modifications with significant impacts to the other resources.
Multiple [5]	Independent Citizen	Exploring these alternatives is essential for meeting Endangered Species Act obligations and reducing the long-term need for expensive and ineffective fish-collection facilities. The SEIS should evaluate all reasonable actions that could help restore native fish populations—not just those that fit within traditional operational constraints. A broader range of alternatives will give the public, the resource agencies, and Tribal governments a clearer sense of what dam operations could look like if fish recovery were the central goal. Thank you for considering these comments. I urge the Corps to produce a Final SEIS that fully explores the options needed to recover wild salmon and steelhead while moving toward a more resilient and ecologically healthy Willamette River Basin.	Thank you for your comments. They will be taken under consideration.
Max Hoefer	Independent Citizen	do not bother drawing down reservoirs. We have exterminated the fish, all of our efforts will not bring them back, unless we eliminate humans.	The drawdowns are required by the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. To continue to operate the projects USACE must comply with all applicable laws including the ESA.

[4] Several individuals submitted the same comment: Phil Kirkland, Kenneth Walker, Albert Wei, Scott Sisamis, Cynthia Chen, Mike Brinkley, Brendan Maloy, Clifford Oakley, Brian Oliver, Bryan Mullaney, Ann Hollyfield, Luke Schultz, Walter Tingle, Brian Emerick, Dale Bundy, Jim Coverdell, Jen Matthews, Chris Sheline, Nick Stewart, Douglas Rohn, Nick Parish, Chris Daughters, Chuck Gehling, Peter Murray, Debra Abbott, Kristine Green, Alan L’Hommedieu, Laurel Williams, Joseph Welch, Jordan Farina, Erick Petersen, Sean Brady, Barrett Edgar, Duncan Kerst, Stephen Oder, Teresa Morehouse, Karen Erde, Steve Baker, Jacob Young, Peter Brewer, Sean Bistoff, Bryan Mullaney, Richard Curtis, Noah Jenkins, Steven Novotny

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Commenter Name	Commenter Affiliation	Comment	USACE Response
Michelle Connor	Independent Citizen	I lost my home and my business in the 2020 wildfires. The drawdown of Detroit Lake would only increase our chances of another fire and severely hinder our economic growth. The downtown business district in Detroit, OR was totally devastated and 5 years later is still struggling to return. This drawdown would be another devastating blow to our community.	USACE updated Chapter 3.11 Socioeconomics, to better describe wildfire impacts and economic impacts to the City of Detroit that would occur as a result of the actions in the SEIS.
Karen Pfau	Independent Citizen	I came to meeting to learn more about this "drawdown" - Frankly I was very stressed to read this is a "done deal" without public comment. Very upset I feel too many feds are on the fishes side be "dammed" that human beings who in this state who rely on Tourism, and hydroelectric power are being shut out- I think the most crazy part is we are doing this so fish in our nurseries can go down! Put them is trucks and run them down the hill!	USACE has not made a final decision. USACE will publish a Record of Decision in Spring 2026. The public comment process is a required step, and public feedback is considered before any proposal is approved. Transporting juvenile fish in trucks is one action analyzed in the SEIS. To do this USACE would build a permanent facility to collect and transport or bypass the fish around the dams. The SEIS also analyzes the moving fish operationally via a drawdown. The analysis provided the public with an opportunity to compare the effects of each action and provide the decision maker with their concerns before an action is selected.
Roger Bell	Independent Citizen	Excerpt from Supplemental EIS Notification: SEIS - New Requirements USACE prepares a Supplemental EIS-or SEIS-when new information or requirements come up that weren't part of the original study. This SEIS will address two new requirements: 1. Studying a permanent end to hydropower production at Willamette Valley dams In December 2024, Congress passed the Water Resources Development Act (WRDA) 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. This requirement prevents us from completing our overall review of operations and maintenance of the system and consultation with federal agencies, until we prepare and formally analyze an alternative that ends federal hydropower operations in the Willamette Valley. 2. Implementing a deeper fall drawdown of Detroit Reservoir The National Marine Fisheries Service published a Biological Opinion. That opinion directed USACE to implement a deeper fall drawdown at Detroit Reservoir to support the protection of endangered fish species. We do not anticipate a deep reservoir drawdown at Detroit Dam until fall of 2026. Portland District will first analyze the effects of the drawdown in the SEIS while continuing to carry out water quality and downstream fish passage operations like we have done over the past few years. We are working with NMFS to develop the timing and duration of the deep fall drawdown at Detroit Dam and considering potential impacts to communities and water quality. Because these new requirements came late in the EIS development process, the Portland District published the existing EIS while beginning additional work on the SEIS to evaluate and address the new requirements.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Roger Bell	Independent Citizen	Excerpt from H.R. 8812: 07/22/2024 Passed/agreed to in House: On motion to suspend the rules and pass the bill, as amended Agreed to by the Yeas and Nays: {2/3 required): 359 - 13 (Roll no. 358). (text: CR H4665-4703) SECTION 1. Short title; table of contents. (a) Short title.-This Act may be cited as the "Water Resources Development Act of 2024". (b) Table of contents.-The table of contents for this Act is as follows: ... SEC. 2. Secretary defined. In this Act, the term "Secretary" means the Secretary of the Army. SEC. 334. Willamette Valley, Oregon. The Secretary may not complete its review of, and consultation with other Federal agencies on, the operation and maintenance of the 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.	Thank you for your comments. They will be taken under consideration.
Roger Bell	Independent Citizen	Whoever wrote the paragraph in the USACE statement for item 1 needs to go back and read the verbiage in H.R. 8812, SEC 334. Granted, it reads like legal beagle gobbledygook, but there is no way to extrapolate a mandate for "Studying a permanent end to hydropower production at Willamette Valley dams". Furthermore, it explicitly states " ... notwithstanding hydropower being an authorized purpose of such projects." I may be missing something, but I'm guessing that no hydropower function was just attached to a project and nobody knew it was there until now. Those kinds of things require approval by somebody so they can be funded and built into the structure as it is being constructed. That simple logic alone makes item 1 of the SEIS New Requirement a non-starter. Now, if the USACE has a list of projects that meet the criteria of SEC. 334 - hydropower projects that were not authorized - and the USACE can offer alternative power sources that meet or exceed the capability and reliability of those unauthorized hydropower projects, then we have some viable considerations for ceasing operation of those unauthorized hydropower projects.	Text of Section 1326 of WRDA 24 required USACE to formally analyze an alternative that ceases hydropower operations regardless of it being an authorized purpose of the projects. USACE analyzes stopping hydropower generation in Alternative 6.

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Roger Bell	Independent Citizen	As for item 2 of the USACE statement, I went to your web site (https://www.nwp.usace.army.mil/Missions/Environmenta1Stewardship/Fish/WVP-Bi0P/) to read the BiOP. Then I went to your site and downloaded the Final EIS to read thru the alternatives and review the preferred alternative for the EIS (2.10.4.9 Alternative 5-Preferred Alternative Refined Integrated Water Management Flexibility and ESA-listed Fish Alternative). Looking at Chapter 2, page 82, under "Downstream Passage Measures", Items 40, 714 and 720 are not marked with an "X" for BCL (Big Cliff Dam) or DET (Detroit). It looks like you folks have done your job, you considered several alternatives and then chose one. Now it appears that a bureaucratic department has just overreached and directed your organization to ignore your Preferred Alternative and just "do as I say, because it's my opinion that matters, not yours". If this is just another error on behalf of the author of the "New Requirements", you really need to find a new person to write your statements. If this is indeed a "direction" from the NMFS to ignore your previous work (and not a request for reevaluation of the already selected Preferred Alternative), the Secretary of the Army needs to have a sit down with the NMFS and explain the difference between "consulting with" and "directing" USACE operations. Opinions are not orders and a consultant never gives orders, just opinions. If you change your mind and no longer support your designated Preferred Alternative, that is what you need to justify. An opinion from a bureaucratic group that looks at one small piece of very large puzzle is not justification, and certainly not a directive. Stay the course, go with your Preferred Alternative from the EIS you've already completed.	Thank you for your comment. We will take it under consideration.
Rick Breckel	Kokanee Power of Oregon	Insanity as defined by Albert Einstein is "doing the same thing over and over and expecting a different result". We come here representing an angler group of over 15,000 members known as Kokanee Power of Oregon. ACOE now appears to be treating Detroit as the next fish passage experiment after Green Peter, yet we have seen NO transparent, science based results of improved salmon survival and migration from below Foster Dam. We all now realize the destruction and harm done from the Green Peter drawdown where nearly all the fish, including the Kokanee, trout, and chinook smolts were killed, as well as the next years population in spawning reds in the rivers downstream by the excessive siltation. These are facts stated by unnamed agency fish biologists who were on the ground. In addition, we suspect that the damage to public water systems due to siltation will be significant as it was from Green Peter and here again NO studies have been done to illustrate otherwise. We recommend the following approach:	While the kokanee losses at Green Peter were a significant outcome, that drawdown also improved downstream passage and survival for juvenile Chinook salmon. The Detroit drawdown operation is designed to improve salmon passage while reducing adverse impacts based on data from the previous drawdowns at Green Peter and other WVS dams. The deep drawdown would occur during the late fall/early winter, outside the refill period. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed elevation of the drawdown, and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. For the data and methodology that support these findings please look at the environmental consequences subsections in Chapter 3 under water quality and fish and aquatic habitat and their associated appendices.

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Rick Breckel	Kokanee Power of Oregon	1. Defer the final decision until science based results show improved salmon survival and migration from Green Peter. ACOE should release measurable outcomes before a similar action at Detroit.	The data and methodology that SEIS analyses of the drawdowns can be found in the environmental consequences subsections in Chapter 3 under fish and aquatic habitat and the associated appendix.
Rick Breckel	Kokanee Power of Oregon	2. Extend this comment period until communities, anglers, and water providers have enough time to evaluate the proposed actions and study results.	USACE extended the end of the comment period from December 29, 2025 to January 13, 2026.
Rick Breckel	Kokanee Power of Oregon	3. Complete an environmental assessment and engineering feasibility study of building a simple weir system at the upper end of Detroit reservoir on the North Santiam and/or Brieghtenbush rivers to catch the smolts and truck them down to Minto for release . This would only be needed to operate for a few specific months when the majority of smolts are migrating such as in April/May when the fry are coming out of the gravels and possibly September. This would take the Detroit out of the picture completely. Outside of this short period the weir could be left open to allow any debris and flood waters through. It would obviously be much cheaper than the original $.5 Billion proposed for the control tower and catch facility. It would also allow ODFW to mark and sort Chinook from Kokanee smolts and measure survival results. Along with this effort, you could continue to shut down the Detroit turbines to allow any smolts in the lake to migrate out that way during peak migration times.	The concept outlined—collecting juvenile fish and transporting them past the dam—is the foundation of Measure 392 which was analyzed as part of the SEIS. However, Measure 392 collects the juvenile fish in the reservoir instead of at the head the reservoir as the commentor suggest. USACE, with input from ODFW, NMFS and others, conceptually discussed a collection system at the upper end of the reservoir or in the tributary rivers or streams, but screened it from inclusion in the SEIS because collection at those sites is difficult as the upper end of the reservoir fluctuates. Collection within the rivers above the reservoir is also complicated by large amounts of debris, and the need to collect primarily small juvenile (fry) migrating downstream in spring during periods of high flow. So, most of the river would need to be diverted through a screened system to collect the migrating juveniles. Collecting fry (< 50 mm in length) and safely and effectively separating them from debris carried into a collection system would cause high risks of injury and mortality for species and high operational costs.
Rick Breckel	Kokanee Power of Oregon	Will there still be a pool 130 feet deep at the lowest level and how long will this level remain before the filling process begins? How far up the lake towards the island does this pool come? If it's a very short distance, virtually all the Kokanee will be swept downstream but if it extends most of the way to the island, a surviving population might remain.	The proposed drawdown would be up to 55 feet lower than typical winter elevations. At this elevation Detroit Reservoir would still be a deep pool of water, however the depth would allow juvenile Chinook to pass more readily downstream. The target elevation would be achieved in late November or early December and held for approximately two weeks depending on natural hydrology. The reservoir would then begin to refill following the existing flood control diagram. This would continue to be optimized under an adaptive management framework. At the target low elevation, the pool would be approximately five miles. This is one mile less than the six mile length at the current seasonal low.
Rick Breckel	Kokanee Power of Oregon	Where does this level come from? Why was this chosen, by what research data, etc. Would it be any more effective than current low lake levels in the past drawdowns?	The proposed minimum target pool elevation for the deeper drawdown at Detroit is based on field studies showing juvenile Chinook prefer to pass the dam when depths to the outlets are reduced and competing flows through outlets are minimal. At the current lowest pool elevation, 1450 feet, the shallowest outlet for fish is the turbine penstocks, about 45 feet deep, which results in high fish mortality. When water is instead passed through the regulating outlets at 1450 feet, the depth to that outlet is about 100 feet or more, reducing the number of juveniles passing this safer route. A deeper drawdown would reduce the depth over the regulating outlets, allowing more fish to safely pass through that outlet.

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Rick Breckel	Kokanee Power of Oregon	How deep is the silt level at Detroit and how many cubic yards will be flushed downstream?	The depth of the sediment that has accumulated in the reservoir since its construction depends on the location in the reservoir. Sand and silt will settle quicker after entering the reservoir and develop a delta at the head of the reservoir just below the normal minimum pool. Finer material will stay in suspension longer and settle further into the reservoir closer to the dam or continue downstream. The proposed deep drawdown is 55 feet and would expose part of the reservoir delta of mostly unconsolidated sand and silt. Per standard reservoir design practices, reservoir sedimentation monitoring is done through repeat surveys over the lifespan of any given reservoir. Pre-dam topographic conditions were surveyed in the 1950s and repeat bathymetric surveys were conducted in 2013 and 2025. This data is being analyzed to quantify the accumulated sediment. From experience at Green Peter, only 2/3 of the available sediment moved during the first few years of drawdowns and 90% of that resettled in the reservoir's residual pool. How much sediment would erode, re-settle in the residual Detroit pool, and/or continue downstream would be mitigated with the proposed stepwise approach and the size of the remaining pool. Real time data and monitoring would inform whether to proceed with the operation as planned, reduce the target elevation, or cease the operation each year. USACE would report estimates of total sedimentation from Detroit's repeat surveys and any additional analysis to the state, counties, and cities in accordance with the Deep Drawdown Emergency Response and Communications plan.
Rick Breckel	Kokanee Power of Oregon	What is the worst case, such as during the lowest drawdown period we have high rain and flooding and more than expected siltation occurs? Could it be worse than Green Peter? Data from 1996 flood should provide some of that information here at Detroit.	Pre-dam topographic conditions were surveyed in the 1950s and repeat bathymetric surveys were conducted in 2013 and 2025 to inform the sedimentation and turbidity analysis in the SEIS. Because the proposed Detroit drawdown is not as deep or will be held as long as the initial Green Peter drawdown it is highly unlikely that the amount of sediment that moves downstream would be great than Green Peter in 2023. Additionally, real time data and monitoring would inform whether to proceed with the operation as planned, reduce the target elevation, or cease the operation each year further reducing downstream turbidity impacts.
Norma and Dave Guile	Independent Citizen	We have owned our property on Small Lane in Detroit since 1991. We built a house on it in 2014. It was destroyed by the wildfires and we rebuilt in 2022. However, while we have rebuilt, much of the town and especially the business community has not. We fear that the current plan to do a deep drawdown of the lake has the potential to harm communities downstream and to also impact the economic feasibility of the Detroit business community. We also question whether the potential benefit to salmon recovery is not more than offset by the detrimental effects on the lake's current fish populations. We believe there are three essential elements that you should consider before implementing your plan	USACE analyzed the potential socioeconomic impacts to the Detroit community (Section 3.11 Socioeconomics and Appendix I Socioeconomics Analysis). Current evidence shows that juvenile fish move downstream during the drawdowns. For the data and methodology that support these findings please look at the environmental consequences subsections in Chapter 3 under the fish and aquatic habitat section and its associated appendix.

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Norma and Dave Guile	Independent Citizen	First, you are still collecting data on the success or failure of deep drawdowns at other locations like Green Peter and Foster Reservoir. Seeing how things look after five years of drawdowns in those locations would make more sense before doing a Detroit drawdown.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams based on the drawdowns at different locations in WVS. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. These drawdowns have been ongoing for varying lengths of time. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats due to the timing, elevation, and duration of the drawdown. USACE assessed elevation of the drawdown, and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. The drawdowns are required by the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. To continue to operate the projects, USACE must comply with all applicable laws including the ESA.
Norma and Dave Guile	Independent Citizen	Second, the topology of the Santiam canyon is quite different than the areas below Foster Dam. Placing a huge waterflow down the Santiam Canyon may have unintended consequences in addition to the strain on the water systems downstream.	Flood risk management operations take priority over the drawdown operation. USACE would not increase flows above bankfull elevations as part of the drawdown operation.
Norma and Dave Guile	Independent Citizen	Three, the additional 55 feet below the normal drawdown level is likely to make refilling the reservoir very difficult unless we have a very wet winter. As we know from the last ten years, the rainfall and snow-pack patterns have not been as plentiful as they were 20-30 years ago. Without a full reservoir the business community will likely not rebuild in Detroit.	The drawdown would occur during the late fall and early winter, when the reservoir is at its lowest elevation to accommodate high flows during the flood season. The drawdown operation would end about one month before the normal refill season, leaving a substantial amount of time for the reservoir to fill the typical minimum conservation elevation. The hydrologic modeling supports the conclusion that the drawdown is not expected to impact refill of the reservoir, except during very dry years, when the ability to refill is more of a reflection of natural hydrology than winter operations.
Norma and Dave Guile	Independent Citizen	This being said, we recognize that some action is likely needed due to the court mandate. However, we would suggest that instead of doing the proposed full drawdown in 2026 - that you gradually move towards your target lake level of 1395 feet. If in 2026 you went to 1425 feet, as has been done occasionally for dam maintenance, then in 2027 went to 1415, in 2028 to 1405, and then in 2029 go to 1395 feet it would lessen the downstream turbulence by allowing just 10 additional feet of lake bank to be exposed each year. It would also allow more time to assess the positive and negative impacts at Green Peter and Foster. Perhaps by 2027 or 2028 you would find that a lesser drawdown was needed at Detroit or new technologies could somehow improve the situation overall. This gradual approach would also give the communities downstream more time to prepare and allow the business community in Detroit more time to rebuild. Thank you for considering our testimony.	USACE assessed elevation of the drawdown, and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. Section 2.8.6 Interim Operations describes the proposed operation.

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Derrick Sites	Independent Citizen	I would like to go on record noting my concerns existing fishing (especially kokanee population) and summer events (camping and boating) All of which impact community revenue and growth and prosperity of some.	Impacts to recreation are discussed in Appendix K. It includes a detailed analysis of water levels and how they affect boat ramp access and recreation opportunities under each alternative. Figures 1-2 through 1-6 in Appendix K show the range of possible water levels under different precipitation scenarios for the entire year at Detroit reservoir under each action alternative, the no action alternative, and interim operations. The elevations of each boat ramp at Detroit Reservoir are included in these graphs. During the median expected water year, the Mongold boat ramp would be unavailable from approximately the beginning of December through early/mid-January under interim operations. This period represents the least busy fishing period at Detroit Reservoir according to analyzed data. Only in extremely dry years (the bottom 5% of water years) would the interim operations significantly impact boat ramp access during the remaining 10-11 months out of the year. In these years, access would be severely diminished across all alternatives largely due to the lack of precipitation not the drawdowns.
Derrick Sites	Independent Citizen	Water quality for downstream communities. Case in point. Green Peter	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.
Derrick Sites	Independent Citizen	Being one of the last reservoirs affected, why wouldn't Detroit be maintained as a control and validate other drawdowns are effective before jumping in. Need to explore other options.	The Detroit drawdown is included in the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. The Biological Opinion requires the deeper drawdown of Detroit Reservoir until a different fish passage solution is in place.
Anne Correia	Independent Citizen	Currently, there are fish in the river that will be killed off- in the hope that Salmon might populate in the area. It's not worth the risk to our aging infrastructure - nor the cost	Thank you for your comments. They will be taken under consideration.
Anne Correia	Independent Citizen	I'm concerned about the possibility of a drought and the consequences - despite the money that is being spent to drill storage wells ....do those wells further disrupt the environment?	USACE is not proposing to drill any storage wells to offset any impacts from its actions on regional water supply so an analysis of the environemental impacts from the placement of wells is outside of the scope of the SEIS. However, the SEIS provides a detailed hydrologic analysis of system operations including water supply, irrigation, and water quality.
Anne Correia	Independent Citizen	Combine the above with the economic effect to Detroit Lake area ...I don't think the draw down is a good idea	Thank you for your comment. We will take it into consideration.

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Multiple [6]	Independent Citizen, Kokanee Power of OR	Subject: Comments on Detroit Reservoir SEIS – Need for Data and Alternatives To the U.S. Army Corps of Engineers: Thank you for the opportunity to comment. I am submitting these comments as a member/supporter of Kokanee Power of Oregon and as someone who cares about the health of Detroit Reservoir, its fisheries, and the communities that depend on it. 1. Please release the scientific results from the Green Peter drawdown before taking similar actions at Detroit. The public has not been shown whether salmon survival improved or whether the significant fish kills, barotrauma injuries, and siltation impacts observed at Green Peter were avoided or mitigated. We cannot evaluate Detroit without this information.	The WVS EIS and draft SEIS includes the available scientific references relied on to assess the effects of the Green Peter drawdown. Additional recent information Willamette Fish Passage Operations and Maintenance is available online at the following sites: https://public.crohms.org/tmt/documents/FPOM/2010/Willamette_Coordination/ https://public.crohms.org/tmt/documents/FPOM/2010/Willamette_Coordination/WFSR/
Multiple[7]	Independent Citizen, Kokanee Power of OR	2. Please extend the public comment period. Municipalities, water providers, anglers, and recreation groups need more time to understand the proposal, especially since crucial Green Peter data has not been released.	USACE extended the end of the comment period from December 29, 2025 to January 13, 2026.
Multiple[8]	Independent Citizen, Kokanee Power of OR	3. Please fully evaluate alternatives to a major drawdown. Please ensure the Corps has fully evaluated alternatives to a major drawdown, including seasonal smolt-collection weirs that are widely used elsewhere and could allow safe fish transport without the severe ecological harm associated with large pool reductions.	USACE analyzed a reasonable range of nine alternatives that looked at how to pass juvenile fish downstream of the dams. The concept outlined—collecting juvenile fish and transporting them past the dam—is the foundation of Measure 392 which was analyzed as part of the SEIS. However, Measure 392 collects the juvenile fish in the reservoir instead of at weirs at the head the reservoir as the commentor suggests. USACE, with input from ODFW, NMFS and others, conceptually discussed a collection system at the upper end of the reservoir or in the tributary rivers or streams, but screened it from inclusion in the SEIS because collection at those sites is difficult as the upper end of the reservoir fluctuates. Collection within the rivers above the reservoir is also complicated by large amounts of debris, and the need to collect primarily small juvenile (fry) migrating downstream in spring during periods of high flow. So, most of the river would need to be diverted through a screened system to collect the migrating juveniles. Collecting fry (< 50 mm in length) and safely and effectively separating them from debris carried into a collection system would cause high risks of injury and mortality for species and high operational costs.

[6] Several individual submitted the same comment: Jim Wheaton, Debbie Dixon, John Henry, Joe Moritz, Johnathan Herring, Wade Parker, Kelly H. Herring, Noah Newman, [Illegible Name], Josh K., Ken G. James, James Miley, Deborah Miley, Ernest D. Hopkins, E. Hanes, Tim Laurance, Brian Kostenbauer, Rick Breckel, Richard Adams, Aislynn Litraleis, Nolan Peterson Steven Turner, Joe Kupillas, Gregory Schmidt, Bradley Halleck, J Smith, [Illegible Name], Karen Litrakis, Norton Todd B., James Bruce, James Miley, Deborah Miley, Ken James

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Multiple[9]	Independent Citizen, Kokanee Power of OR	4. Please protect ongoing scientific research at Detroit Reservoir. Detroit hosts a multi-year scientific study on anti-microbial treatments and juvenile-fish survival. A drastic drawdown could interrupt or destroy several years of data collection, undermining research that directly benefits salmon recovery statewide.	USACE delayed implementation of the deeper drawdown of Detroit in the fall for juvenile fish passage, as required by the NMFS 2024 BiOp, to evaluate the operation in the SEIS and to allow for public comment to inform the operation. USACE must comply with all applicable laws and Treaties in its operation and maintenance of its projects.
Multiple[10]	Independent Citizen, Kokanee Power of OR	5. Please ensure that Detroit's kokanee fishery, recreation economy, and local water systems are fully analyzed. The Green Peter drawdown caused severe impacts to fish populations and downstream habitat, according to biologists and residents. Detroit's much larger recreational and economic footprint requires a comprehensive evaluation.	An analysis of the economic and environmental impacts at Detroit Reservoir is a central focus of the Supplemental Environmental Impact Statement (SEIS). The impact observed at Green Peter provided critical lessons that shaped a different approach for the drawdown at Detroit. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts. The SEIS Section 3.19.4.1 Turbidity discusses water systems, and Section 3.11 Socioeconomic, Section 3.14 Recreation Resources and Appendix K analyze potential impacts to recreation.
Multiple[11]	Independent Citizen, Kokanee Power of OR	Thank you for considering these comments. I am not opposed to salmon recovery—I support it. I simply want to see transparent science and balanced management before irreversible decisions are made.	Thank you for your comments. They will be taken under consideration.

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Lynn Baker	Independent Citizen	Thank you for the opportunity to comment on your Environmental Impact Statement on management and refinement alternatives for Willamette River dams. We lived on the banks of the Willamette for some years and fully appreciate your flood control mandate. Also, as a 50 year resident of the Northwest, I deeply appreciate the benefits of our hydropower system. Here on Orcas Island, where we now live, the air is clean in part because we have a very high rate of electric car use. I drive my Chevy Bolt on federal hydropower -- no guilt! Clean start to finish. I personally believe our greatest challenge is climate change, and that we should do everything we can to STOP BURNING THINGS! For me, that means not burning yard debris, as well as driving electric.	Thank you for your comments. They will be taken under consideration.
Lynn Baker	Independent Citizen	Eliminating viable, existing, economically sound hydropower is counterproductive to the needs of the world, including fish. If temperatures keep rising, Northwest salmon will suffer. We should keep and keep using all the hydropower we have, unless and until the world or at least the Western Interconnection stops burning fossil fuels to produce power.	Thank you for your comments. They will be taken under consideration.
Kevin Anderson	Independent Citizen	My name is Kevin Anderson owner of Next Level Guide Service. I'm writing to you in opposition of the drawn down of Detroit Lake. I do not support your plan to draw down Detroit Lake as you did with Green Peter. My guide business has already been significantly impacted with the draw down of Green Peter. The Draw down of Detroit Lake will probably be even more significant to my business. I'm a life long Oregon resident. I spent over 30 years as a public servant. I have fished at Detroit Lake for my entire life (over 55 years). I'm a life time member of Kokanee Power of Oregon. More than losing my dream business you are taking away a fishery that has given so many memories to so many people. PLEASE… Take a moment and look at my Facebook page of my past 10 years of guiding at Detroit Lake for Kokanee!!	Thank you for your comments. They will be taken under consideration. Thank you for your comments. They will be taken under consideration.
Kevin Anderson	Independent Citizen	Kokanee? Have you been to an Oregon sportsman show in the past 5 years? Yep, Kokanee guides & Kokanee tackle is probably nearing the #1 fishery in the state of Oregon & PNW. It's my hopes you take a moment and ask yourself?? Are you doing what's right thing for the citizens of Oregon & Detroit Lake? Or are you doing what special interest groups are politically telling you what to do? Do the right thing! Protect the North Santiam Canyon, Protect Detroit Lake, protect the Kokanee and DO NOT repeat the disaster at Green Peter.	Thank you for your comment. We will take it under consideration.
David Cooke	Independent Citizen	Please don't draw down Detroit Lake. It seems the priority should be for good drinking water quality for the people in Salem. I'm sorry, but with millions of people living in Oregon we can't be saving all of the native fish. Somethings gotta give, and it's way too high a price to pay to save a few salmon.	Thank you for your comment. We will take it under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Georgia Platts	Independent Citizen	I am writing with regard to the proposed Detroit draw down. The drawdown was approved before climate change had threatened us with greater fires and drought. A yearly drawdown risks threatening our drinking water supplies and our ability to fight wildfires. At this point, it is too risky to draw the lake down when it may not fill up again. Too many lives are at stake in the quarter-million metro area.	Thank you for your comment. We will take it under consideration.
Autumn & Kevin Stone	Independent Citizen	Our family is writing to express our strong opposition to the proposed deep drawdown of Detroit Lake starting in 2026. As concerned residents of Detroit and Salem, we worry about devastation to the lake's fishery, local economy, and drinking water supplies for over 200,000 people living in Salem, Stayton, and other towns below the dam.	Thank you for your comments. They will be taken under consideration.
Autumn & Kevin Stone	Independent Citizen	This drawdown could also further harm tourism in the Santiam Canyon, already struggling from the devastating 2020 wildfires, if the lake fails to refill due to drier springs.	The drawdown operation would end about one month before the normal refill season begins, meaning that refill will largely be driven by the natural hydrology. The drawdown is not expected to impact refill of the reservoir, except during very dry years.
Autumn & Kevin Stone	Independent Citizen	We can look at the 2023 Green Peter drawdown, which caused significant kokanee salmon die-offs from barotrauma despite aiming to help endangered Chinook, raising doubts about effectiveness and risks of similar harm at Detroit Lake.	The local kokanee fishery at Green Peter Reservoir has experienced significant losses due to the deeper reservoir drawdowns. Studies at Green Peter confirmed the drawdown improved downstream passage and survival for juvenile Chinook salmon, which is the primary goal of the proposed drawdown at Detroit. The plan for Detroit incorporates lessons learned from Green Peter and operations at other WVS dams. Key differences from Green Peter include: Timing: The drawdown is scheduled for late fall, when the water is cooler and kokanee are more widely distributed, reducing the risk of a mass casualty event. Scale: The drawdown would be less extreme than what occurred at Green Peter, leaving a larger portion of the reservoir intact. Duration: The drawdown would we held for a shorter period of time than the Green Peter drawdown in 2023. While impacts to the kokanee population are expected, these measures are expected to reduce impacts observed at Green Peter.
Autumn & Kevin Stone	Independent Citizen	Additionally, exposing decades of accumulated silt risks flushing muddy water downstream, clogging filters, and threatening drinking water in Salem, Stayton, and other downstream towns as disastrously occurred at Green Peter. In fact, the cities of Sweet Home and Lebanon have filed a $37 million claim against the U.S. Army Corps of Engineers to cover damages from claims that the drawdown created a "sludge blanket buildup" in their water facilities. Causing damages to their water treatment plant, increasing operational costs and requiring system upgrades for over 100,000 residents.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats. USACE assessed elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Autumn & Kevin Stone	Independent Citizen	Our family urges the Army Corps to reconsider and wait for conclusive data from ongoing drawdowns before proceeding with this high risk plan lacking any guaranteed benefits.	The Detroit drawdown is included in the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. USACE must comply with all laws when operating the WVS. The Biological Opinion requires the deeper drawdown of Detroit Reservoir until a different passage solution is in place.
Warren Koch	Independent Citizen	The very low numbers of downstream smolts after the Green Peter draw-down should tell us this method is a long-shot at best. You'd be better off to look at the system put into place on the Lewis River in Washington State. Yes, maybe more expensive in upfront cost, but certainly more successful and probably cheaper in the long run.	Studies from Green Peter show that the drawdown improved downstream passage and survival for juvenile Chinook salmon, which is also the primary goal of the proposed action at Detroit.
Heather Lawerence	Independent Citizen	My main concern about lowering Detroit's reservoir is how much this could impact farmers and to water their crops not just residents downstream and our ability to fight the growing amount of wildfires we have been experiencing for the last 5 years.	The drawdown would occur in the late fall/early winter and is not expected to impact summer reservoir levels. The drawdown operation would end about one month before the normal refill season. Impacts to water supply and irrigation are analyzed in Chapter 3 of the SEIS.
Heather Lawerence	Independent Citizen	Another solution needs to be investigated. If this plan fails and Detroit isn't able to regain the waters due to our lack of rainfall it will not only damage the local economy it will also put our forests at much greater risk. Detroit already burned once we don't want it to happen again.	Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the drawdown at Detroit. This figure is based on model results and does not show how real-time water management can minimize negative effects to reservoir elevations. The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. The drawdown is not expected to impact refill of the reservoir, except during very dry years, when a lack of natural hydrology is the underlying factor.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Dave White	Independent Citizen	The 2008 and 2024 BiOPs are complete junk science, cherry picking data from legislators and no scientists. The Corp has wasted over $40 million at Green Peter since 1989 when the fish ladder was filled with silt. Now the silt is at 775 feet and the fish ladder is at 525 feet. It costs $25 million to dredge behind these dams and get the fish ladders working. We will come to the Station [Stayton] meeting on the 16th. And tell people this. FERC Writ in the Supreme court is in default. One of the prayers for Dam Removal Application is from now any Dam removal or change must be approved by us. The items list of what must be accomplished. The upload for application is here: Dam Applications Page To prevent Sea Lions from eating them as they enter the fish ladder at Bonneville Dam on the Columbia River The Sea Lions are the majority issue for the salmon not the Columbia river dams. NOAA Fisheries in Portland Oregon will start killing Sea Lions this week in the Columbia river. Please go to this link and contact their two leaders and say they don't need to kill the Sea Lions just give us the funding for salmonprotection.com https://www.fisheries.noaa.gov/about/west-coast-region Grantor agency has assigned the following Agency Tracking Number to your application: 3231688. Grantor Agency is NOAA Fisheries. The judge's decision on Green Peter Dam was based on incomplete science published in a predatory journal. The Klamath river dams needed upstream side dredging to install fish ladders. The western Oregon Dams need dredging behind them not blown up! https://thelawisyourattorney.com/WRIT_OF_CERTIORARI_FERC.pdf We recommend International Journal of Uncompromised Science Ijus.org NOAA Northwest fisheries have switched to just restoring habitat. They know our device is the solution to the salmon issue. https://www.fisheries.noaa.gov/west-coast/endangered-species-conservation/what-you-can-do-help-recover-salmon-and-steelhead-west-coast Billion spent and nothing fixed. https://www.opb.org/article/2023/08/05/columbia-river-salmon-habitat-spending-study/ The article says "Prior to damming, an estimated 16 million salmon and steelhead returned to the Columbia River in the area above what is now Bonneville Dam each year. But by the 1970s, less than 1 million were returning." This is true because the Columbia river dams didn't have fish ladders. Starting around 1970 fish ladders were installed in the Columbia river dams and the runs returned in a few short years, In the late 1980's Sea Lions found an easy meal at the fish ladders and fisher men's fishing line. In 2002 2.5 million returning in spring runs. This spring less than 300,000. Or this link Complaint filed against NOAA Fisheries waste of $1 billion as a whistle blower. Our $3 million in funding has finished scientific Peer review at NOAA Fisheries.	USACE constructed Green Peter Dam (1963-1966) with a short fish ladder that led to an elevator system designed to provide adult upstream fish passage by lifting adult salmon and steelhead from the downstream tailrace to the upstream reservoir forebay. The dam also included a floating downstream passage system connected to a bypass pipe to provide downstream passage of juvenile salmon and steelhead. These systems were abandoned due primarily to cool water releases inhibiting collection of adult Chinook, and poor survival of juveniles and smolts migrating downstream in Green Peter Reservoir. Small fish ladders at adult fish facilities are used to load fish into trucks to transport them above the dams. SEIS is primarily focused on how to transport juveniles downstream, but he SEIS does analyze systems that could provide upstream adult and downstream juvenile passage. Dam removal is not analyzed. See Appendix A for measures screened from formal analysis, including dam removal.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Karen & George Vigeland	Independent Citizen	We (George and Karen Vigeland) feel that it is urgent to express our absolute horror regarding the potential drawdown of Detroit Lake. There are innumerable disasters that would result from this plan. It is a threat to water quality, the environment, public safety and economic recovery. I realize that the determination of this order for the drawdown was made far from Detroit and long before the devastating fires of 2020. The decision needs to be revised--in current time!	The Detroit drawdown is included in the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. The Biological Opinion requires the deeper drawdown of Detroit Reservoir until a different fish passage solution is in place.
Karen & George Vigeland	Independent Citizen	Our Concerns: 1. Water Purity. Salem depends on Detroit for its water supply. A drawdown will create muddy waters which will overwhelm existing purification systems. LIVES ARE AT STAKE!	USACE understands drawdowns can increase turbidity which may have adverse effects to drinking water systems. Deep drawdowns facilitate the downstream passage of species listed under the Endangered Species Act. The Detroit proposal is designed to improve salmon passage success while avoiding impacts based on lessons learned from all the drawdowns conducted over the past decade, such as drawing the reservoir down at a different time of year and taking a few years to reach the target elevation. To help reduce turbidity, USACE analyzed lowering the reservoir over several years. It will also use real-time continuous water quality monitoring to determine whether to continue, pause, or cease the drawdown operations.
Karen & George Vigeland	Independent Citizen	2. Our family has owned property on the banks of the reservoir for over 55 years. The lake has always been full from spring to mid-September- until recent years. Management of the reservoir needs to be revised due to the many changes over the years. There are many more demands on the water from the reservoir. Environmental changes due to the wildfires have caused earlier runoff due to decreased snowpack shade. These earlier runoffs are not being captured! The current 'fill curve' is out of date and needs revision.	Updating the rule curve is beyond the scope of the SEIS. Studying changes to the rule curve would impact USACE's flood control mission due to posing an unacceptable risk to life safety, thus were screened out from consideration as part of this effort.
Karen & George Vigeland	Independent Citizen	3. Wildfires have increased all across the Western US. We have seen Detroit Lake used as a source for water as planes scoop in and retrieve the water. KEEP IT FULL! Detroit Lake is a defense against future fires, which are predicted to continue.	The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. Even during the drawdown, a large pool would remain.
Karen & George Vigeland	Independent Citizen	4. We have seen firsthand the devastation of the economy in the Detroit area. The entire Santiam Canyon is struggling to rebuild after the Labor Day 2020 fires. A drawdown at this point will strike a FINAL BLOW to the fragile economy of the entire Canyon.	The SEIS incorporates the FEIS by reference, noting that the 2020 North Santiam River Subbasin wildfires resulted in substantial adverse effects on opportunities (Chapter 3.11 Socioeconomics, section 3.11.3.1 Methodology and section 3.6, Vegetation, section 3.6.2.3, 2020 Wildfires). USACE updated SEIS Chapter 3.11 Socioeconomics, section 3.11.2.2 to describe the relationship between the socioeconomic impacts and location specific impacts.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Karen & George Vigeland	Independent Citizen	5. We have seen the results from previous drawdowns where thousands of dead Kokanee and other fish are on dry land. Please do not do that to Detroit!	The local kokanee fishery at Green Peter Reservoir has experienced significant losses due to the deeper reservoir drawdowns. Studies at Green Peter showed the drawdown improved downstream passage and survival for juvenile Chinook salmon, which is the primary goal of the proposed action at Detroit. The impacts observed at Green Peter have provided critical lessons that shape a different approach for Detroit. Key differences include: Timing: The drawdown is scheduled for late fall, when the water is cooler and kokanee are more widely distributed, reducing the risk of a mass casualty event. Scale: The drawdown will be less extreme than what occurred at Green Peter, leaving a larger portion of the reservoir intact. While impacts to the kokanee population could still be significant, these measures are expected to reduce impacts as observed at Green Peter.
Karen & George Vigeland	Independent Citizen	6. We are also concerned to know if the goals of this drawdown are warranted. What are the statistics of the salmon run before the Detroit Dam? The other considerations for human health and survival should outweigh the concerns for salmon.	Just prior to construction of Detroit Dam, a few thousand spring Chinook and a few thousand winter steelhead were estimated to spawn in the North Santiam River Subbasin. Historically their abundance was much higher. See, for example: https://www.dfw.state.or.us/fish/CRP/upper_willamette_river_plan.asp
Karen & George Vigeland	Independent Citizen	We fled for our lives on Labor Day 2020 when wildfires descended on Detroit. We had no warning. We were fortunate our neighbor called to say 'Get Out Now!'. We lost our home. We believe in Detroit, so we have rebuilt. We hope we don't lose it again due to outdated edicts.	Thank you for your comments. They will be taken under consideration.
Marti Cheek	Independent Citizen	I am writing to you to request information about the impact the upcoming project will have on the residents downstream on the Santiam River. Will the river rise when this project proceeds? What impact do you anticipate and will this be a permanent situation? Thank you for your time in this matter.	The drawdown would not result in river elevations higher than existing river levels during high flow events. The drawdown would occur during the late fall/ early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. If selected the operation would continue, as required by the ESA, until a different fish passage solution is available.
Alvin Klausen	Marion County Board of Commissioners	Please accept this letter of public comment from the Marion County Board of Commissioners regarding the Supplemental Environmental Impact Statement (SEIS) on the Army Corps of Engineers operational changes at the Detroit Dam in the Willamette Valley System. Thank you for your time, consideration, and work on this issue.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Alvin Klausen	Marion County Board of Commissioners	The Marion County Board of Commissioners writes to provide comments on the Draft Supplemental Environmental Impact Statement (SEIS) addressing proposed changes to the operations of the Willamette Valley System, including Detroit Dam. Marion County encompasses downstream communities that rely heavily on the North and South Santiam Rivers for drinking water, economic vitality, recreation, and overall public health. As such, we have serious concerns regarding the Preferred Alternative as it relates to Detroit Reservoir operations.	Thank you for your comments. They will be taken under consideration.
Alvin Klausen	Marion County Board of Commissioners	Downstream Drinking Water and Turbidity Concerns Foremost among our concerns is the risk of increased turbidity and sediment transport to downstream drinking water systems that rely on the Santiam River system as their primary source of potable water. Communities including Salem, Stayton, Turner, Jefferson, and multiple rural water districts collectively serve more than 200,000 Oregonians using water drawn directly from the Santiam Rivers. These systems are not designed to withstand prolonged or repeated high-sediment events without substantial cost, operational disruption, or risk to public health. The SEIS characterizes anticipated turbidity impacts as "moderate," yet recent experience in the Willamette Basin calls that conclusion into question. The Green Peter and Foster Reservoir drawdown experiment, conducted for similar fish passage objectives, resulted in extreme turbidity levels downstream and tens of millions of dollars in documented damage to municipal drinking water infrastructure. Critically, the SEIS does not adequately incorporate this real-world data into its analysis, nor does it demonstrate how conditions at Detroit would materially differ in a way that meaningfully reduces risk. Without clear, quantitative sediment modeling, turbidity projections, treatment-threshold analysis, and contingency planning, the SEIS does not provide sufficient assurance that downstream drinking water systems can operate reliably under the proposed drawdown regime. The Board is particularly concerned that proceeding without these analyses places local governments and ratepayers at risk of bearing the financial and public health consequences of a federal operational decision.	The SEIS analyzed impacts water supply and turbidity. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit based on model results. The impact is low because the drawdown would occur during the late fall and early winter during the season with the largest amount of precipitation. The drawdown operation would end about one month before the normal refill season would begin, meaning that USACE will have an entire month to regain the 55ft in elevation which can happen as quickly as in a few days. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill. The model results depicted also do not reflect how real-time water management can help to minimize impacts to reservoir elevations. USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur.

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Alvin Klausen	Marion County Board of Commissioners	Scientific Uncertainty and Effectiveness of the Proposed Action The Board is also concerned that the SEIS does not demonstrate, with site specific scientific evidence, that the proposed deep drawdown at Detroit Dam will achieve its intended biological outcomes. While improving passage for ESA-listed salmonids is an important goal, the SEIS relies heavily on assumptions rather than empirical results. Notably, the Green Peter/Foster drawdown experiment has not yet demonstrated measurable improvements in salmon returns, and adult fish response will not be known for several years. Given this uncertainty, it is premature to expand or replicate a drawdown strategy that has already produced severe and documented downstream impacts elsewhere in the basin. The SEIS does not answer the fundamental question facing affected communities: does this approach actually work, and does the anticipated benefits outweigh the demonstrated risks? Absent clear evidence of effectiveness, Marion County believes it is inappropriate to impose further risk on downstream water users and communities.	The Detroit drawdown operation is designed to improve salmon passage while reducing adverse impacts based on data from the previous drawdowns at Green Peter and other WVS dams. The proposed minimum target pool elevation for the deeper drawdown at Detroit is based on field studies showing juvenile Chinook prefer to pass the dam when depths to the outlets are reduced and competing flows through outlets are minimal. At the current lowest pool elevation, 1450 feet, the shallowest outlet for fish is the turbine penstocks, about 45 feet deep, which results in high fish mortality. When water is instead passed through the regulating outlets at 1450 feet, the depth to that outlet is about 100 feet or more, reducing the number of juveniles passing this safer route. A deeper drawdown would reduce the depth over the regulating outlets, allowing more fish to safely pass through that outlet. The WVS EIS and SEIS include the scientific references relied on to assess the effects of the drawdowns. Additional information relied on is available online at the following websites: https://public.crohms.org/tmt/documents/FPOM/2010/Willamette_Coordination/ and https://public.crohms.org/tmt/documents/FPOM/2010/Willamette_Coordination/WFSR/. While long-term data on adult returns from the specific action at Green Peter is not yet available, the strategy is based on established fish behavior. Studies show that juvenile salmon have higher survival rates when they pass WVS dams through non-turbine outlets at shallower depths (which this operation facilitates). Additionally, juvenile kokanee salmon that passed through the dam during these operations have returned as adult sockeye salmon after foraging in the ocean. The drawdown at Fall Creek has also been proven to be an effective operation for ensuring juvenile salmon survive their downstream migration. While this has unfortunately come at the cost of the local fishery for resident fish in Fall Creek Reservoir, results demonstrate that this operation has led to increased adult salmon returns over time compared to pre-drawdown conditions.
Alvin Klausen	Marion County Board of Commissioners	Cumulative Impacts of Federal Actions Communities in the North Santiam Canyon and downstream Marion County have repeatedly absorbed the impacts of federal decisions related to land management, forest policy, dam operations, and emergency response. These cumulative impacts matter. Local governments and residents have consistently been asked to adapt to operational changes over which they have little control, while shouldering long-term economic and infrastructure consequences. This proposed operational change must be evaluated within that broader context. The SEIS, as drafted, does not sufficiently account for the cumulative burden placed on these communities by successive federal actions, particularly when risks are localized while benefits remain uncertain or long-term.	The SEIS evaluates the effects to the human and natural environment, including socioeconomic effects, and take those effects into consideration when selecting an operating plan for implementation. To continue to operate the WVS, USACE must comply with all applicable laws and Treaties, including the ESA and the authorizing legislation for the projects.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Alvin Klausen	Marion County Board of Commissioners	Ongoing Recovery from the 2020 Wildfires Finally, the Board emphasizes that communities in and around the Santiam Canyon are still actively recovering from the devastating 2020 Labor Day wildfires, which caused catastrophic loss of homes, businesses, infrastructure, and community stability in Detroit, Idanha, Gates, Lyons, and surrounding areas. Recovery has been slow and uneven, and recreation-based economic activity tied to Detroit Lake and the Santiam River system remains a critical pillar of that recovery. Actions that further disrupt reservoir levels, water quality, or recreation access risk undermining this fragile progress, yet the SEIS does not sufficiently analyze or acknowledge how the proposed drawdown could compound ongoing wildfire-related economic and social impacts.	The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season begins. Even during the drawdown, a large pool would remain. USACE updated Figure 1-2 through Figure 1-6 EIS Appendix K Recreation, for year- round water levels under different hydrologic scenarios. In all but the driest years, the deep drawdown would not impact boat ramp access.
Alvin Klausen	Marion County Board of Commissioners	Marion County's Request The Marion County Board of Commissioners remains committed to protecting Oregon's natural resources and ensuring the long-term health and resilience of our environment. However, we cannot support proceeding with a deep drawdown at Detroit Dam without clearer scientific justification, comprehensive incorporation of lessons learned from the Green Peter/Foster experiment, and robust analysis of downstream drinking water risks and community impacts. We respectfully request that the U.S. Army Corps of Engineers pause further implementation of this proposed operational change until: • The results of prior draw down experiments are fully evaluated and publicly documented; • Site-specific sediment and turbidity modeling is completed for Detroit Reservoir; • Downstream drinking water providers are fully engaged and protected; and • The cumulative and post-wildfire impacts to Santiam Canyon communities are meaningfully addressed. Marion County stands ready to work collaboratively with the Corps to identify solutions that balance fish recovery goals with public health, water reliability, and community resilience. Thank you for your consideration of our comments.	The existing data and modeling done for the EIS are high quality information and will inform the decision. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats. USACE assessed elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.

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Robert Cooper	Independent Citizen	I am concerned that the proposed Detroit drawdown will have adverse, and possibly disastrous effects on the large population in the Salem, Oregon metro area. With a drawdown, our water is likely to become tainted and undrinkable. Plus, with increasing droughts, we face the possibility that the lake won't reliably refill. And that would leave a large population without adequate water to drink, shower, or to fight fires that increasingly threaten us. I strongly implore the Army Corps of Engineers to reject this project.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats. USACE assessed elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure is based on model results and does not show how real-time water management can help to minimize impacts to reservoir elevations. The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill.
Sharon & Jerry Krause	Independent Citizen	What good reasons can you give to draw down Detroit Reservoir???? Probably none!! Please reconsider!!!! Sharon Krause Salem resident affected by water from the canyon	The proposed Detroit Reservoir drawdown is a legal requirement under the Endangered Species Act (ESA). The National Marine Fisheries Service determined in their 2024 Biological Opinion that action is required to improve passage and access to habitat above Detroit Reservoir to avoid causing irreversible harm to threatened salmon and steelhead populations, until a different downstream fish passage system at Detroit Dam is completed.
Dianna Lamb	Independent Citizen	Please stop with the drawdown of that lake. Those People and all of us have been endangered species acted to death. Between this and the IMTS / Forest service leter rip fire policies and the repercussions of road closures due to fire and landslides From the fires we have had about enough. We need solutions and this is an unacceptable solution. These are our public lands build fish ladders and leave the lake alone we need the forest service to scrap the endangered species act and open up our roads and put fires out and build a stinkin fish ladder. Thanks for listening	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michael Mullejans	Independent Citizen	I have been a resident of Stayton, Oregon for 13 years. Life is enjoyable here. Stayton enjoys clean, clear water, one of the finest in our state. This water meets or surpasses all state and federal water quality requirements. It was even recognized for its taste, winning "Best Tasting Surface Water in Oregon" for two consecutive years in the past. The city uses a reliable slow sand filtration process, which employs naturally occurring biological activity to remove contaminants. This is a key factor in its high quality. This means that the systems used to filter this water are much simpler and less sophisticated than the elaborate filtering systems used in other cities. Any elevation in the turbidity would destroy Stayton's filtering systems and cause extensive damage, making the system hard and very expensive, long and difficult to replace. Stayton's water may take a very long time to recover from this, and possibly never completely recover to its present state. The drawdowns are planned over several years, making any repairs futile, as new assaults of increased turbidity caused by even progressively more severe drawdowns would come each successive year. This is a prospect all inhabitants of our region are extremely apprehensive about. We feel the price to pay for the salvation of a protected fish species -- which is doubted by some scientists and criticized by some is disproportionate to the result that is only hopefully for. Please cancel all plans for such deep drawdowns in Detroit Lake, and consider dredging upstream instead, assisted by transportation of the fish by truck. Thank you for your consideration.	USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify, pause, or cease the operation each year to improve conditions for fish and reduce adverse impacts downstream. Modeling also shows that Turbidity generally lessens each year a drawdown to a particular elevation occurs as the system returns to an equilibrium. Dredging the reservoir was not analyzed as it would not achieve the objectives for the alternatives in the study. Moving fish by truck above and below the dams is a major focus of the SEIS.
Kaethe & Bayard Mentrum	Independent Citizen	Some of these require comments, not just answers. Please do so at your earliest as we would like to share with our community in Salem. We are all very concerned. 1. If you drain from the upper regulating outlets located close to the bottom, if there are sediment like ash from the fire which are fine and toxic, wouldn't the draining cause those sediments to run out to North Santiam River?	USACE expects the drawdown to flush out some fine sediment, and designed the operation with a stepwise approach to mitigate the intensity over the first few years. USACE tested the Detroit Reservoir sediment several times, most recently in 2013 and 2018 and would sample the reservoir again in April 2026 to analyze the sediment for heavy metals and contaminants, as well as grain size prior to initiating the deeper drawdown.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Kaethe & Baynard Mentrum	Independent Citizen	2. Wouldn't the turbulency caused by water draining out stir the rest of the water in the dam and cause a toxic and ill effect towards the fish that are there?	The Detroit Reservoir drawdown would stir up fine sediment that has settled on the reservoir bottom. The primary risk to fish from this sediment is physical, not chemical or "toxic." High concentrations of suspended particles can irritate and clog fish gills, causing stress and making it difficult for them to breathe and find food. To manage this risk, the proposal includes two key protections: 1) Phased Drawdown: The reservoir would be lowered in stages, not all at once. 2) Continuous Monitoring: Turbidity levels would be measured at the dam's outlets. If the water becomes too muddy, the operation would be paused or stopped to allow the sediment to settle. This careful, monitored approach is designed to keep turbidity within levels down to protect the health of the fish that remain in the reservoir, as well as downstream.
Kaethe & Baynard Mentrum	Independent Citizen	3. Wouldn't the draining of the upper regulating outlet which is located about 200 feet below the 463 foot Detroit dam cause non-use of the electrical connections which is located at about 100 feet down? These will no longer be usable since it will be dried up. Having no electricity should not be an option. Salem, Stayton, Detroit City and others around will need electricity obviously and it is for USACE to determine how and be responsible, not other electric companies to know what to do to keep electricity flowing at all times.	The dam would not produce hydropower during the drawdown. A backup generator would provide power to operate the dam during the drawdown. USACE's authority is limited to hydropower production; Bonneville Power Administration is responsible for the transmission and marketing of federal power produced in the WVS. The SEIS analyzes how the reduction in power from the drawdowns impacts national and regional economics.
Kaethe & Baynard Mentrum	Independent Citizen	4. The proposed drawdown is 50 feet above the highest regulating outlet, so the fish will have to swim down 50 feet to get out through the upper outlets. According to Google, the smolt's capacity to go down is at most 40 feet, not 50 feet. Remember they are juveniles and their young bodies are not equipped well like the adults.	The target drawdown pool elevation is 1395 which is 50 feet above the center line of the upper regulating outlets at Detroit Dam. Studies at other reservoirs have confirmed that drawdowns improve downstream passage and survival for juvenile salmon when these fish pass through non-turbine outlets at shallow depths (which this operation facilitates). Some juvenile Chinook salmon would pass downstream through dam outlets at greater the 50 feet of depth, however numbers passing increase when depths are lower. This operation balances providing downstream passage improvements and the ability to refill the reservoir to support other objectives, including recreation and downstream water supply the following year.
Kaethe & Baynard Mentrum	Independent Citizen	5. The way the dam is constructed, the concrete juts out and without enough water to cushion them, these juveniles will possibly die from either shock or hitting the concrete.	Studies have shown survival of juvenile salmon and steelhead is higher through spillways and regulating outlets at WVS dams compared to through turbine penstocks due to less fish strikes.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Kaethe & Baynard Mentrum	Independent Citizen	6. We were informed USACE is hoping there will be less sediment each time you go down within the next three years. Just because you draw down a little more each year, it's not going to clear the sediment. What are you going to do to clear up each time?	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts.
Kaethe & Baynard Mentrum	Independent Citizen	7. Why can't you perform the old way of trucking them to the river. Whether it's inefficient or not, it may be more effective than killing the juvenile fish, safer doing an expensive drawdown which could badly affect the communities of Salem, Stayton, Detroit City and highly possible to kill many smolt that could not escape. They could also kill resident fish like trout, large and small as well as Kokanee salmon unless they get transferred to another location. We realize this is the holiday season and we hate to bother you at this time, however, our community is concerned. The timing of the questions to be answered is December 29th which is during the holiday season so we don't have much choice but to ask now. Thank you.	Adult species that return and enter the adult fish facilities are taken by truck and released above the dams. Currently there is not a system for capturing juvenile fish and transporting them downstream. The SEIS evaluates passing these juvenile fish via operations or a structural modification to the dam that would gather the fish so they could be trucked below the dams. SEIS analyzes the tradeoffs between these options with the drawdowns generally having larger impacts on water quality, water supply, recreation, and hydropower generation. While the structures have very high costs but have significantly less impacts to the other authorized purposes.
Roger Lemons	Independent Citizen	My name is Roger Lemons and have been a resident up here for 30+ years. This town is just now coming out the fire damage, and water quality issues, and the power being off for days on end and mostly in the winter time. In fact we just made it through 6 days without water and a week prior, we had no power. I know we are not fish but we have rights just the same. Please figure out another solution or the SOL group will be more powerful than the COE group.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Dan Keeley	Independent Citizen	The proposed experimental drawdown of Detroit Lake to benefit salmon and steelhead populations. The experiment will have many serious and expensive negative consequences for the residents in the Willamette Valley but also for the fish. The plain fact is, if we don't mitigate climate change there won't be any fish. The power from Detroit Dam is an important component in the response to climate change, particularly given the current back pedaling in Washington DC. Given the strong returns of hatchery fish and reasonably stable returns of wild fish in the North Santiam, the improvements being made in hatchery breeding programs, the available spawning grounds below Detroit Dam and the need for base load power it makes no sense to sacrifice Detroit lake on an experiment. If we want to further help fish, we already know what works; Improving existing habitat with shading, erosion and nutrient control, timing the release of reservoir water, better selective breeding at hatcheries and control of excessive predators at Dams.	The proposed Detroit Reservoir drawdown is a legal requirement under the Endangered Species Act (ESA). The National Marine Fisheries Service has determined that action is required to improve downstream passage for listed juvenile salmon naturally produced in the streams above the Detroit reservoir so they can migrate to the ocean to mature before returning to reproduce. The USACE must comply with the ESA's legal mandate to avoid jeopardizing listed threatened or endangered species to continue to operate the WVS for the dams' original purposes (including flood control, water supply, hydropower, etc.) A phased, gradual implementation of the proposed deeper drawdown of Detroit includes real time water quality monitoring, designed to reduce risks for kokanee in Detroit Reservoir, and reducing turbidity.
Joe Dula	Independent Citizen	Hello, to whom it may concern. The idea of a deep draw down of Detroit lake is a TERRIBLE IDEA! You will NOT get the kind of results you think you will. What you will do is ruin one very strong fish population of Kokanee salmon in the thousands by attempting to save a few hundred Chinook salmon with a long shot wild guess! The Lake does provide economic activity all year. Even in winter now at low levels. Detroit and the Santiam canyon area has struggles enough from changes in logging, lack of hatchery fish program from ODFW and recent wild fires. The lack of planning for fish passages many years ago when the Dam was built was a poor decision. Making a SECOND poor decision will not correct the first one! Find a way to "stock" the Chinook salmon into the upper river. Develop a method to trap the smolts and truck them below BOTH reservoirs. (Detroit and Big Cliff). This would not be simple but would be less disruptive to all other parties involved for the entire surrounding community. You need to find other ways to address the fish passage. Do NOT attempt a deep draw down of Detroit Lake.	The SEIS evaluates the effects to the human and natural environment, including socioeconomic effects, and USACE will take those effects into consideration when selecting a plan for implementation. To continue to operate the WVS, USACE must comply with all applicable laws and Treaties, including the ESA and the authorizing legislation for the projects. USACE updated SEIS Chapter 3.11 Socioeconomics, section 3.11.2.2 to describe the relationship between socioeconomic impacts and location specific impacts. Adult species that return and enter the adult fish facilities are taken by truck and released above the dams. Currently there is not a system for capturing juvenile fish and transporting them downstream. The SEIS evaluates passing these juvenile fish via operations or a structural modification to the dam that would gather the fish so they could be trucked below the dams. SEIS analyzes the tradeoffs between structural modifications and operational drawdowns. In short, operations generally have larger impacts on water quality, water supply, recreation, and hydropower generation. While the structures have very high costs but have significantly less impact on the other authorized purposes.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Wendy Stone	Independent Citizen	Hello, I am a 75 year old female who has grown up and lived in the North Santiam Canyon area, specifically in Stayton, Oregon, my entire life. And, I am deeply concerned about the Corp's planned deep drawdown of Detroit Lake and the resulting impact to my drinking water. I understand the planned slow step-down is being driven by the Endangered Species Act, a federal court injunction, and a 2024 Biological Opinion issued by NOAA Fisheries, which you did not challenge. However, my concern is with my drinking water, which is the best tasting water in the State of Oregon having been voted this distinction from the State's Wastewater Treatment Professionals in a blind taste test for many years running. Stayton uses a slow sand filtration system of treatment and the planned drawdown of the North Santiam River will cause turbidity that our system is not designed to handle. Slow sand filtration systems used to treat water for human consumption have been in use for centuries and work especially well with clear mountain streams, such as the North Santiam River. However, they can not handle high sediment loads, like what you will create with the deep draw down of the river. Fine powder like sediment, which is what you will create in a deep draw down of the North Santiam River, will permanently damage slow sand filtration systems, like Stayton's! You will leave our city of over 8,000 people without usable water for weeks if not months or years. If the Corp cannot guarantee Stayton will not lose our drinking water, then I demand that you must pause the planned draw down and work with Congress to either re-evaluate the drawdown requirement, modernize the Environmental Species Act, or fully fund a redundant water treatment system for my hometown. Anything less will be disastrous to the many people who depend on the clean clear water of the North Santiam River.	USACE updated Section 3.19 of the SEIS to expand on effects to the North Santiam drinking water facilities. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Dave White	Independent Citizen	The ruling said to drain the dam to release the massive silt behind it (The silt is around 775 feet tall according to an Operator of the dam). The result was dark colored water running from Linn County their faucets. The clean water act specifically prevents this: the provisions of the Federal Water Pollution Control Act, specifically 33 U.S.C. 1251 a. 1-7. This is also 42 USC CHAPTER 6A, SUBCHAPTER XII: SAFETY OF PUBLIC WATER SYSTEMS. The clean water act prevents discharge of silt from any dam. Specifically Section E 1 as the required public meetings for this single subject were not scheduled. No Judge can violate this. https://www.epa.gov/cwa-404/overview-clean-water-act-section-404 Neither the Secretary of War or Secretary of Commerce has approved this drawdown. Therefore, an injunction to stop the illegal drawdown is required by federal law. Plaintiff and Class action members humbly request the Federal Court to vacate by FRCP 60 (2) the erroneous ruling in 18-cv-00437-HZ. As of November 3rd 2025 No Dam in the USA or its territories may be removed or have its turbines removed without specific permission of salmonprotectiondevice.com The 2008 and 2024 Biological Opinions are junk science and void. https://salmonprotectiondevice.com/Dam_Removal_Application.pdf https://salmonprotectiondevice.com/Dam_removal_Approval_Procedure.pdf https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25-5808.html Nov 06 2025 DISTRIBUTED for Conference of 11/21/2025. Nov 03 2025 Waiver of right of respondent FERC to respond filed. Main Document	Thank you for your comments. They will be taken under consideration.
Bayard Mentrum	Independent Citizen	After I have spent many hours researching the seemingly misguided drawdown proposal that had the intent of saving endangered salmon The items below are suggestions and concerns: 1,. The regulating outlets were built too low for small fish to use and if the army corp. lowers the water level too low much sediment will not only kill the fish but also destroy the drinking water as in the Green Peter dam fiasco. Currently the sediment levels are vey high due to the heavy rainfall .	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Bayard Mentrum	Independent Citizen	2. If the CORP. Lowers the water in 10-20 foot stages and runs into sediment it may not be low enough for smalls to reach the much lower outlets so that would not save the fish as was intended.	Based on previous studies evaluating fish passage, benefits for juvenile Chinook would begin with any reduction in the pool elevation below the current low season elevation, but the full benefits of the proposed operation would be when the target elevation is achieved. Juvenile Chinook prefer to pass dams using outlets at depths of 50 or less, however some will dive over a hundred feet. This operation will reduce the number passing through the turbine penstock and allow passage through the non-turbine regulating outlets.
Bayard Mentrum	Independent Citizen	3. If the draw down goes too low the electric charging station will reduce power.	The dam would not produce hydropower during the drawdown. A backup generator would provide power to operate the dam during the drawdown.
Bayard Mentrum	Independent Citizen	4. Instead of taking a chance on killing fish and destroying the region water quality why not gather the fish into an area where they can be netted or siphoned into tubes and carried down stream to spawn. Even though this system is not the most efficient it would safer in the end overall.	The concept described by the commentor is similar to what the downstream fish passage structures in Alternativities 1,2A,2B, 4, 5, and 6 is designed to do. The impacts of a structural passage solution at Detroit can be found in Chapter 3 of the SEIS.
Kaethe Mentrum	Independent Citizen	Please respond to the following questions at your earliest opportunity. 1. We have been informed and makes perfect sense that it will be imprudent for USACE should you move forward with any drawdown until the Corps revises the EIS to address how fine sediment will impact the drinking-water systems on the North Santiam. a. How will you handle this situation? b. How long do you expect this to be? c. Making a study might take a while. Do you have any timeline?	USACE updated Section 3.19 of the SEIS to expand on effects to the North Santiam drinking water facilities. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur.
Kaethe Mentrum	Independent Citizen	2. I am requesting for a comprehensive modernization of the Endangered Species Act. We can and should protect some species, but it is common sense to say that we must do so in a way that does not steamroll rural communities or jeopardize essential public services like drinking water. a. a. How will you handle this situation? b. Has this already been assessed and do you agree? Again, do you agree and intend to rely more on common sense going forward?	Congress is responsible for amending the ESA. Until the ESA is revised, USACE must comply with existing laws when carrying out its mission. To reduce impacts on rural communities and drinking water facilities during drawdowns, USACE would use real-time turbidity data to determine if a drawdown operation should be modified, paused, or ceased. USACE would coordinate with the State of Oregon and the water system purveyors during the drawdown.
Laura Jamieson	Independent Citizen	I am writing as a resident home owner in the city of Salem. I have heard that the proposed drawdowns are to support the Chinook Salmon which are possible endangered as a species, however I understand that this is no longer true.	Chinook salmon are currently listed as a threatened species and are afforded protection under the Endangered Species Act.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Laura Jamieson	Independent Citizen	I also have good reason to suppose that the increased turbidity of waters in the lake will be too risky and expensive due to requiring alternative water filtration systems and may affect our water quality and supply, not to mention sources of hydropower. This will affect my quality of life and my property value.	USACE updated Section 3.19 of the SEIS to expand on effects to the North Santiam drinking water facilities. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS.
Laura Jamieson	Independent Citizen	Furthermore, I don't believe the tiny young Chinook can swim deep enough to exit and accomplish your purpose. Please re-assess these important aspects of your plan.	The target pool elevation for the proposed Detroit Reservoir drawdown is 1395 feet which is 50 feet above the center line of the upper regulating outlets at Detroit Dam. Studies at other reservoirs have confirmed that drawdowns improve downstream passage and survival for juvenile salmon when these fish pass through non-turbine outlets. Although some juvenile Chinook salmon would pass downstream through dam outlets located at greater the 50 feet of depth) the number passing is higher at reduced depths. This operation balances providing downstream passage and the ability to refill the reservoir to support other objectives, including recreation and downstream water supply the following spring, summer, and fall. The proposed drawdown is an interim action to provide fish passage to comply with the Endangered Species Act until a different passage solution is engineered and constructed.
Steve Mealey & Tyler Holloway	Mckenzie River Guides Association	Thank you for the opportunity to comment on the Willamette Valley System Operations and Maintenance (WVSO&M) Draft Supplemental Environmental Impact Statement (EIS), November 2025. Since the McKenzie River and its spring Chinook salmon are among our primary concerns, we limit our comments to that part of Alternative 6 that discontinues hydropower production at Cougar Dam, affecting Chinook salmon. We previously commented on the WVSO&M Draft Programmatic EIS, November 25, 2022. Those comments (2/14/2023) are hereby incorporated into this letter and are also attached. There, we advocated using the regulating outlet (RO) at 1,505' for successful fish passage while meeting turbidity standards. We were pleased to see that the Interim Operations in the Selected Federal Action, outlined in the Record of Decision (ROD) for the WVSO&M Final EIS (Hall, 5/13/2025), required delayed reservoir refill and RO prioritization for improved downstream fish passage during February to May/June, with RO as the priority outlet at a target pool elevation of 1,520'-1532' (ROD pages 9-10). These operations were refined from the Draft EIS to incorporate the final National Marine Service (NMFS) Biological Opinion (BO) on December 26,2024.	Thank you for your comments. Your previous comments were evaluated again considering incorporation by reference of and the modifications the SEIS. As described ,the operations will target the use of the ROs for passage.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Steve Mealey & Tyler Holloway	Mckenzie River Guides Association	Downstream passage of juvenile salmon at Cougar Dam under Alternative 6 would be provided operationally with a deep drawdown in the fall and spring to 25 feet over the diversion tunnel (DT) or to a pool level of 1,355'. The improved downstream passage through operations at Cougar Dam would result in direct, substantial reductions in adverse effects of the dam, on downstream fish passage. However, operations under Alternative 6 would cause an increase in sediment and turbidity levels downstream of Cougar Reservoir because of deeper drawdowns to near original streambed elevations, increasing bank erosion and sloughing. Fine sediment would be transported downstream resulting in seasonal increased turbidity. As a result of the deep reservoir drawdowns, sediment discharged below Cougar Dam would increase, resulting in short-term moderate, adverse effects on all life stages of fish residing downstream. Alternative 6 would result in pool levels around 1,355'--- 95' lower than the "1,450 pool" established by the USACE as the minimum pool level to prevent high turbidity levels and high rates of sediment transport downstream of Cougar Dam as occurred in 2002 during construction of the Cougar Dam water temperature control tower. Drawdown to 1,355' under Alternative 6 would also be inconsistent with the BO target pool level (s) (1520'-1532') judged by the NMFS to be sufficient to protect Endangered Species Act protected Chinook salmon. Compared with the Alternative 6 drawdown level of 1,355" to near the DT, reducing adverse effects to salmon, the pool level of 1,520-1532' to near the PO outlet specified in the ROD also provides substantial reduction in adverse dam effects without the unacceptable downstream turbidity effects of Alternative 6.	The diversion tunnel operation at Cougar is in multiple alternatives as described in Chapter 2. It will undergo significant amounts of additional study. Dam safety studies and design studies will be necessary to consistently use the diversion tunnel as an outlet, instead of as an emergency outlet. Site specific environmental compliance will be done prior to the retrofitting of that outlet and water quality will be addressed as part of that compliance. Operations for downstream passage of juvenile Chinook using the regulating outlet (RO) at Cougar are reviewed annually to consider refinements as new information becomes available to achieve downstream passage goals and objectives. Structural modifications to the RO are proposed, to further reduce injuries and increase survival rates for juvenile Chinook passing via the RO. A check-in with NMFS is scheduled as part of the adaptive management plan (Appendix N) to assess these improvements to determine if the RO could serve as the long-term solution for downstream passage before proceeding with modifications and long-term use of the diversion tunnel.
Steve Mealey & Tyler Holloway	Mckenzie River Guides Association	Ceasing federal hydropower operations at Cougar Dam as presented in Alternative 6, is clearly not the best option to benefit salmon and other McKenzie River ecosystem resources. The McKenzie River Guides Association (MRGA) strongly supports the interim direction of the ROD now and as the draft supplemental EIS is being considered.	Thank you for your comments. They will be taken under consideration.
Steve Mealey & Ethan Nickel	Mckenzie River Guides Association	Please see the Attached MRGA comments on the WVS O&M DSEIS (Nov 2025). Thank you for the opportunity to comment. MRGA	Thank you for your comments. They will be taken under consideration.
Steve Mealey & Ethan Nickel	Mckenzie River Guides Association	1. MRGA strongly supports the inclusion of the "Suite of Near-term Operations" (Table 2.2-11) in all alternatives. We recommend that USACE work with U.S. District Judge Hernandez to develop the "suite" into a complete Alternative to be considered in a supplemental DPEIS to DPEIS-0540.	Thank you for your comments. The interim operations were included in the action alternatives 2-6. They were not included in Alternative 1 because they do not meet the stated objectives for Alternative 1. The "suite" of interim operations are fully analyzed within each alternative and may be selected in the ROD.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Steve Mealey & Ethan Nickel	Mckenzie River Guides Association	2. Deep Fall and Spring Reservoir Drawdown to the Diversion Tunnel (DT) at Cougar Dam (Final measures 2.2.3.1 and 2.2.3.3) as called for in Alternatives 2B, 3B, and 5-the Preferred-would result in pool levels of 1,330' (Tables 2.2-7, and 2.2-8), 120' lower than the "1,450 pool" established by the USACE as the minimum pool level to prevent high turbidity levels and high rates of sediment transport downstream of Cougar Dam as occurred in 2002-2004 during construction of the Cougar Dam water temperature control tower (WTCT) (USACE DEIS: Cougar Dam Downstream Passage; January 2019). Pools of 1,330' could easily conflict with the Oregon Turbidity Rule: OAR 340-041-0036 which states in part "No more than a 10% cumulative increase in natural stream turbidities may be allowed", with some exceptions. High possibility or probability of violating the turbidity rule by implementing alternatives 2B, 3B, and 5 (Table 3.3-4) would call into serious question stated environmental consequences of these Alternatives in Chapter 3 (Tables 3.2-4, and 3.1.6). This would cast doubt on the overall sufficiency of the DPEIS-0540. Chapters 6 (6.3) and 7 (Table 7.8-1) document past (4/24/20) and future (as needed regarding Clean Water Act-CWA- section 404 permitting) coordinating meetings with Oregon DEQ which are unlikely to address the turbidity matter discussed here in a timely way. At a minimum, USACE and ODEQ should meet immediately on the matter of deep drawdowns to DT to clarify likely compliance or non-compliance with the Turbidity Rule and implications for CWA 404 permitting. If the turbidity issue raised here is valid, then Alternatives 2B, 3B and 5 are unlikely to meet Objective 6 (page 2-6). Further, paragraph 3, page ES-35 states: "Without detailed investigation and designs, the dam safety and operational feasibility of drawing down to the diversion tunnel annually for fish passage is uncertain". With high uncertainty about Alternatives 2B, 3B, and 5 meeting turbidity standards and fish passage requirements, their usefulness in this DPEIS appears deeply suspect. That in turn would jeopardize the integrity of the entire DPEIS process. We believe USACE should fully exhaust every feasible option for using the regulating outlet (RO) at 1,505' (1,517'? -page 2-29) for successful fish passage. If successful fish passage using the RO appears reasonable and uncertainties about drawdown to the DT remain, then Alternative 3 A should receive much deeper consideration as the basis for a Preferred Alternative.	The diversion tunnel operation at Cougar will undergo significant amounts of additional study prior to implementation. Dam safety and design studies will be necessary prior to consistently using the diversion tunnel as an outlet, instead of as an emergency outlet. Site specific environmental compliance will be done prior to the retrofitting of that outlet and water quality will be addressed as part of that compliance. Operations for downstream passage of juvenile Chinook using the regulating outlet (RO) at Cougar are reviewed annually to consider refinements as new information becomes available to achieve downstream passage goals and objectives. Structural modifications to the RO are proposed, to further reduce injuries and increase survival rates for juvenile Chinook passing via the RO. A check-in with NMFS is scheduled as part of the adaptive management plan (Appendix N) to assess these improvements to determine if the RO could serve as the long-term solution for downstream passage before proceeding with modifications and long-term use of the diversion tunnel.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Steve Mealey & Ethan Nickel	Mckenzie River Guides Association	3. Recreation is considered mostly in and around reservoirs, neglecting specifically the long-established river guiding and outfitting industry MRGA represents which operates mostly on the McKenzie, Middle Willamette, and North and South Santiam, rivers. Non-MRGA river-based recreation activities are relevant as well. These activities including raft-based summer float trips and multi-season river-boat based fishing for trout, salmon and steelhead are heavily influenced by (mostly unannounced) fluctuating river levels resulting from USACE reservoir/dam management decisions. DPEIS alternatives all have different effects on river flow levels, hydrologic processes and river infrastructure as indicated in Table 3.1-6. Due to the programmatic level of analysis, this listing of environmental effects is generally qualitative and of limited value in determining effects on boating and river-boat guided fishing. Summary hydrographs are produced to describe the changes to the flow and surface elevation with the implementation of each of the alternatives (i.e., Figure 3.2-163 and Figure 3.2-165). The latter figure shows, for example, that there is a 95% chance flow would be above 2,000 cubic feet/second-CFS- between July and mid-October each year and a 5% chance it would be below that level for the same period at Vida. Such information facilitates the understanding of specific variance of flow patterns among alternatives at one site. However, necessary information would be flow volumes by alternative listed as CFS and gauge height for specific monitoring sites on the Middle Willamette, McKenzie, and North and South Santiam rivers by season relevant to river guiding and outfitting and other river-based recreation. We believe a supplemental DPEIS is necessary that fully discloses the effects (environmental consequences) of the alternatives (including but not limited to economic, and river flow data at points relevant to river recreation users) on “below-dam” river guiding and outfitting and other river-based recreation. This is based on the fact that such necessary and sufficient information is lacking in Chapter 3., and relevant material claimed by USACE to be in Appendix B, Hydrologic Processes Technical Information has not been available after several requests.	The SEIS is a programmatic document, intended to evaluate broad effects from alternative ways to operate the Willamette Valley Project as a whole system. As such, the analysis is at a high level to compare these system-wide alternatives. Please see Section 3.2 that shows non-exceedance charts for river flow control points downstream of the dams. In addition, see Appendix K, Chapter 4 for a qualitative analysis that was done to estimate general effects on recreation to riverine areas across the alternatives. Using HEC-ResSim model simulated flow data for various river gage locations across the 84-year period of record, daily flows at each gage location were compared for the action and no action alternatives.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Laurie & Brian Coleman	Independent Citizen	On behalf of citizens who recreate on Detroit Lake and own property on the Santiam River, we appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for continued operations and maintenance of the Willamette Valley System (WVS). There is no rigorous scientific evidence that drawdowns will help salmon populations. Conversely, blindly performing a multi year drawdown is definitely something that could devastate the Santiam Canyon economically, and could likely adversely affect water supply systems downstream, costing millions in tourism and repair costs. We write to express strong opposition to the proposed alternatives, including the Preferred Alternative (Alternative 5), and in particular the inclusion of the late fall/early winter deep drawdown of Detroit Reservoir to elevation 1395 feet, which will have serious adverse consequences for drinking water systems, recreation, the Kokanee fishery, and the broader Santiam Canyon economy. The SEIS fails to adequately characterize these effects and does not demonstrate that the Preferred Alternative will meaningfully benefit ESA-listed fish populations. Our concerns are outlined below.	The target drawdown pool elevation is 1395 which is 50 feet above the center line of the upper regulating outlets at Detroit Dam. Studies at other reservoirs have confirmed that drawdowns improve downstream passage and survival for juvenile salmon when these fish pass through non-turbine outlets at shallow depths (which this operation facilitates). Some juvenile Chinook salmon would pass downstream through dam outlets at greater the 50 feet of depth, however numbers passing increase when depths are lower. This operation balances providing downstream passage improvements and the ability to refill the reservoir to support other objectives, including recreation and downstream water supply the following year. The WVS EIS and SEIS include the scientific references relied on to assess the effects of the proposed Detroit Reservoir drawdown. Additional information is available online at the following sites: https://public.crohms.org/tmt/documents/FPOM/2010/Willamette_Coordination/, and https://public.crohms.org/tmt/documents/FPOM/2010/Willamette_Coordination/WFSR/ While long-term data on adult returns from this specific action is not yet available, the strategy is based on established fish behavior. Studies show that juvenile salmon have higher survival rates when they pass through non-turbine outlets at shallow depths (which this operation facilitates). The SEIS analyzes impacts to water systems, recreation, Kokanee and the broader Santiam economy in Chapter 3 of the SEIS. The DSEIS was updated to include additional information on local water systems and Kokanee.
Multiple[12]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	1. Detroit Drawdown Impacts Are Significantly Understated The SEIS acknowledges that the Detroit deep drawdown will adversely affect water supply, drinking water operations, and recreation (Executive Summary §7.2.2). However, the analysis minimizes the true severity of these impacts: 1.1. Water supply and turbidity impacts Detroit Reservoir provides and supports municipal and community water supply needs in the region. A deep drawdown invariably reduces available storage volume and may lower reservoir elevations at a time when water demand for downstream communities still remains. Downstream communities—including Salem, Stayton, Turner, Jefferson, and rural water districts—serve over 200,000 Oregonians who rely on the North Santiam River for drinking water. The SEIS does not provide credible analysis that these systems can withstand prolonged or repeated turbidity spikes. The SEIS states that the drawdown will cause “moderate” increases in sediment and turbidity. This conclusion is not supported by recent empirical evidence:	The SEIS analyzed impacts water supply and turbidity. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit based on model results. The impact is low because the drawdown would occur during the late fall and early winter during the season with the largest amount of precipitation. The drawdown operation would end about one month before the normal refill season would begin, meaning that USACE will have an entire month to regain the 55ft in elevation which can happen as quickly as in a few days. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill. The model results depicted also do not reflect how real-time water management can help to minimize impacts to reservoir elevations. USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur.

[12] Several individuals made the same comment: Danny Nielsen, Laurie & Brian Coleman; Tracie Evenson; Robyn Roark Morley; Trudy Spraker; Dean Pollman; Melissa Pollman; David Veenedall; Gary Kintz

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Multiple[13]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	The 2023–2024 Green Peter drawdown—conducted for the same purpose and referenced repeatedly in the SEIS—caused catastrophic turbidity levels and an estimated $37–40 million in damage to municipal drinking water systems downstream, particularly for the City of Lebanon and others. Despite this new information, it is absent from the SEIS turbidity analysis and NMFS's 2024 Biological Opinion did not incorporate this data, triggering ESA reinitiation requirements (50 CFR ¬ß402.16(a)(2)).	The SEIS turbidity analysis in Section 3.19 analyzes sediment data collected during the 2023 and 2024 Green Peter drawdowns. USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown.
Multiple[14]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	The SEIS claims Detroit impacts will be lower due to reservoir morphology, but provides no quantitative sediment modeling, no turbidity projections, no treatment threshold analysis, and no emergency planning framework. This is insufficient under NEPA's requirement for "high-quality information and accurate scientific analysis" (40 CFR 1500.1(b)). The SEIS should provide turbidity predictions, sediment load modeling, drawdown-specific geotechnical analyses, and evaluations against Oregon Drinking Water Services turbidity treatment thresholds. We urge USACE to ensure the SEIS clearly assesses: • The specific reduction in available storage volume resulting from each proposed drawdown scenario (feet of drawdown / acre-feet of loss) and the corresponding reduction in yield available for municipal water supply. • The timing of drawdown relative to municipal refill needs, hydrologic variability (drought years or low inflow years), and how that could compromise municipal supply reliability. • Whether municipal supply agreements or commitments are guaranteed or prioritized in the revised operational regime. • The potential need for emergency water-supply interventions in downstream communities if reservoir elevation remains low through the season. Without this assessment, proceeding with a deeper drawdown risks placing undue burden on local municipalities and water-users, contrary to the statutory authorized purpose of water supply.	NEPA does not require quantitative modeling or creating new models, but requires agencies to rely on available high quality information. At this time, there is not a sediment transport model specific to Detroit Reservoir and the North Santiam river downstream of Detroit Dam and wone could not be obtained in reasonable manner. Therefore, USACE used the available high quality data from the previous draw downs, the quantitative modeling of the operational alternatives 3A and 3B, information about the downstream drinking water facilities, and professional judgement to complete a qualitative assessment of potential effects to turbidity and subsequent effects to drinking water facilities. Section 3.13.4 of the SEIS discusses impacts to stored water and downstream river flows from the Interim Operations, including the Detroit drawdown. The drawdown would end a month before the refill season begins. At Detroit there is an 80% likelihood it would be 90% full in any year, this would not change under the drawdown operation. Downstream flows would be the same as USACE would continue drafting the reservoir to meet downstream instream flow targets. There are currently no agreements for use of stored water from Detroit Reservoir. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur. In season management would also lessen impacts to downstream users. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir which will address reliability and emergency water supply interventions. This effort is separate from the SEIS.
Multiple[15]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	Moreover, the Corps did not include an evaluation of suction dredging to mitigate the impacts of sediment on municipal water systems. As reservoir levels fall, increased turbidity can overwhelm drinking water treatment systems downstream, particularly those that were not designed for continuous high-sediment loads. The SEIS should analyze the feasibility and effectiveness of this concept to ensure that public health and drinking water reliability would be safeguarded.	Dredging accumulated sediment from Detroit Reservoir would be a large-scale industrial project. Dredging would require planning, permitting, land acquisition for dredge disposal sites, specialized dredging equipment acquisition and mobilization, dewatering and disposal. USACE would implement the proposed deep drawdown at Detroit over several years and closely monitor turbidity levels in coordination with downstream communities. Incrementally drawing the reservoir down to the target elevation over several years would allow the river to naturally redistribute the newly exposed sediment downstream into the residual pool, reducing the amount of turbidity that moves downstream. After the target elevation of 1395 is reached turbidity will continue to reduce over time.

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Multiple[16]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	1.2. Failure to assess public health risks Given that Salem's 2018 algal toxin crisis required statewide emergency action, failure to robustly analyze drinking water vulnerabilities is a significant deficiency. Without this analysis, NEPA's requirement to evaluate "public health and safety" impacts (40 CFR 1502.16) is not met.	USACE updated Section 3.19 of the SEIS to expound upon the effects to the North Santiam drinking water facilities from the drawdown based on information from commentors. At present, available scientific methods do not allow reliable, site-specific prediction of cyanotoxin mobilization from sediments, given uncertainty in the environmental triggers governing toxin production and release. USACE also does not have control or authority over drinking water systems or how water emergencies are handled. It is responsible for storing and moving water through its system of reservoirs in support of its Congressional directives. It will work with drinking water facilities, Oregon Department of Environmental Quality and Oregon health authority on an Emergency Response and Communication Plan after the SEIS but prior to the drawdown if the deeper drawdown is selected at Detroit. That plan would address response protocols for these types of concerns.
Multiple[17]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	2. Severe Recreational and Economic Impacts Are Not Fully Disclosed As stated by the SEIS in Chapter 3.14, Detroit Lake is one of the most heavily visited waterbodies in the Willamette Basin. Detroit Reservoir is used heavily for recreation—boating, fishing, camping and tourism—which contributes substantially to the regional economy and quality of life. This is especially important for the rural communities of the North Santiam Canyon, which have struggled to identify areas of economic growth following the decline of the timber industry and are still working to recover from the devastation of 2020's catastrophic wildfires. A deep fall drawdown would expose larger shoreline areas, reduce boat ramp access, shorten the effective recreation season, diminish reservoir aesthetics, and could destroy the Kokanee fishery.	Appendix K evaluates impacts to recreation. A detailed analysis of water levels and how they could affect boat ramp access and recreation opportunities under each alternative are there. Figures 1-2 through 1-6 in Appendix K show the predicted range of water levels under different precipitation scenarios across the entire year at Detroit reservoir under each action alternative, the no action alternative, and interim operations. The elevations of each boat ramp at Detroit Reservoir are included in these graphs. Under interim operation during the median expected water year, the Mongold boat ramp would be unavailable from approximately the beginning of December through early/mid-January. This period is the least busy fishing period at Detroit Reservoir according to analyzed data. Only in extremely dry years (the bottom 5% of water years) boat ramp access expected to be significantly impacted during the remaining 10-11 months out of the year. In these years, access would be severely diminished across all alternatives considered and the impact would not be uniquely caused by the deep drawdown. Visual impacts are analyzed in Chapter 3.22. Although there could still be significant impacts to the kokanee fishery, a late-fall drawdown schedule would help reduce impacts on both the kokanee fishery and the peak summer recreation season, thereby reducing economic disruption.
Multiple[18]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	The SEIS acknowledges low summer levels "may" occur in dry years—but this is an understatement: • The drawdown releases over 150,000 acre-feet of water late in the year, reducing the probability of refill even in average winters. • The SEIS provides no hydrologic modeling of refill likelihood following the deep drawdown sequence.	Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure is based on model results and does not show how real-time water management can minimize negative effects to reservoir elevations. The drawdown would occur during the time when the reservoir is already low, at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season during the wettest season of the year. These model results show likelihood of refill across 84 variable years.

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Multiple[19]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	• The likelihood of boat ramp inaccessibility, marina closures, cancellation of recreation seasons, and loss of regional tourism revenue is understated. Again, Detroit and Idanha—already devastated by the 2020 wildfires—depend on recreation for survival. The socioeconomic section of the SEIS relies on regional economic models that mask severe local impacts, failing to capture: • Business closures • Loss of tourism-dependent jobs • Impacts on public services and tax revenue	A phased, gradual implementation of the proposed deeper drawdown of Detroit with constant water quality monitoring would reduce the risk of releasing high turbidity water downstream. Although there could still be significant impacts to the kokanee fishery, a late-fall drawdown would help reduce impacts on the peak summer recreation season, thereby reducing economic disruption. USACE updated Appendix K Recreation to show year-round water levels at Detroit Reservoir under different precipitation scenarios (Figures 1-2 through 1-6). The late fall/early winter Detroit deep drawdown operation would draw the reservoir down to 1395 feet, eliminating access to the lowest boat ramp, at 1450 feet. During extremely dry years, the drawdown may have lasting effects into summer, if there isn't enough rainfall to refill the reservoir. Under current operations, USACE may not be able to refill Detroit reservoir during dry years, as reservoir refill depends on late winter and spring rains. USACE updated to SEIS 3.11 Socioeconomics, section 3.11.2.1 to describe the location specific economic impacts and compounding effects in Santiam Canyon. Regional economic models used to quantify employment industry changes include Detroit and Idanha. The qualitive socioeconomic analysis does not make predictions about the economic viability of any location or business sector rather, it speaks to the scale of the economic environmental consequences of the Interim Operation for the communities in the area of analysis.
Multiple[20]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	Chapter 3.14 acknowledges potential recreation loss, but: • The SEIS does not model refill probability following a 1395' drawdown, despite disclosing that dry years may prevent refill (Executive Summary §7.2.2). • Socioeconomic modeling uses MSA-level data (Table 3-29), obscuring acute impacts to Detroit, Idanha, and the Santiam Canyon. • NEPA requires the evaluation of localized effects where impacts are severe (40 CFR 1508.27(b)(3), intensity factor). Failure to disaggregate economic impact results in an incomplete effects analysis.	Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure is based on model results and does not show how real-time water management can minimize adverse impacts to reservoir elevations. The drawdown would occur during the time when the reservoir is already low, at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season during the wettest season of the year. These model results show likelihood of refill across 84 variable years. As it relates to the socioeconomic modeling metropolitan statistical areas (MSAs), SEIS section 3.11 Socioeconomics, section 3.11.3.1 Methodology describes that the degree of effects does not always equal the degree of effect when compared to the NAA. The modeled analysis for recreation visitation economic activity and socioeconomic effects uses the best available information. Updates to SEIS 3.11 Socioeconomics, section 3.11.2.1 describe socioeconomic impacts and location specific impacts. Effects of employment industry adjustments specific to a community cannot be known with certainty, but both of these updates speak to the scale of the Environmental Consequences analyses required and completed. CEQ's NEPA regulations were repealed prior to beginning the SEIS, so while instructive they are no longer regulatory requirements.

[19] Several individuals made the same comment: Danny Nielsen, Laurie & Brian Coleman; Tracie Evenson; Robyn Roark Morley; Trudy Spraker; Dean Pollman; Melissa Pollman; David Veenedall; Gary Kintz
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Multiple[21]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	The drawdown threatens to prolong and deepen already fragile post-fire community recovery. We recommend that the SEIS include: • A comparative analysis of recreation access under the current operational regime vs. the deeper drawdown alternative: e.g., number of days shorter the season, number of boat ramps unavailable, shoreline reduction in usable recreation area. • An estimate of lost economic revenue (in dollars) to recreation-dependent businesses (marinas, lodging, campgrounds, bait/tackle shops) for each drawdown scenario versus the no-drawdown baseline. • Mitigation measures or compensatory strategies (e.g., improved ramp infrastructure, seasonal coordination, visitor information) to reduce recreation loss. • A transparent stakeholder engagement plan involving local businesses, tourism agencies, and recreation users in shaping mitigation.	USACE updated Appendix K: Recreation to show year-round water levels at Detroit Reservoir under different precipitation scenarios (Figures 1-2 through 1-6). Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure is based on model results and does not show how real-time water management can minimize negative effects to reservoir elevations. The drawdown would occur when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill. Communities in the MSAs have been historically impacted by an influx of workers for dam construction, changes to the timber industry, and more recently by wildfires. USACE completed the analysis of recreation visitation economic activity and socioeconomic effects with the best available information. Updates to SEIS 3.11 Socioeconomics, specifically Section 3.11.2.1, describe the relationship between socioeconomic impacts and location specific impacts. USACE complied with all the public outreach and comment processes for its action required under NEPA. Mitigating impacts to recreation are not a statutory requirement of NEPA. USACE shaped the Detroit drawdown operation to minimize impacts to water quality, drinking water facilities, and recreation including sport fisheries.
Multiple[22]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	3. Devastation of the Kokanee Fishery Is Not Adequately Analyzed The local kokanee (land-locked sockeye) fishery is an important ecological, recreational and economic resource. Lower reservoir levels in the fall and winter will degrade kokanee spawning habitat, reduce refuge areas, increase temperature variability, concentrate predators, and alter food-web dynamics unfavorably. While the draft SEIS emphasizes ESA-listed salmon and steelhead, it gives little attention to kokanee and other fish species that provide an invaluable economic attraction for the North Santiam Canyon.	USACE analyzed the impacts to sport fisheries including kokanee in 3.8 Fish and Aquatic Habitat, associated economic impacts in 3.11, and recreational impacts 3.14. The SEIS accounts for the types of impacts you have listed using available information in these sections.

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Multiple[23]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	The SEIS acknowledges that the drawdown will increase entrainment, injury, and mortality of resident fish species—including stocked Kokanee and trout—stating that "significant reductions in abundance" are possible (Executive Summary §7.2.2), however: • The SEIS minimizes the recreational and economic importance of the Kokanee fishery. • No population modeling is provided. • No mitigation measures are proposed. • No stocking adjustments or survival targets are included. This does not meet NEPA's requirement for evaluating ecological consequences at a sufficient level of detail (40 CFR 1502.2). The Green Peter drawdown wiped out its Kokanee fishery entirely. The SEIS offers no evidence that Detroit would fare differently.	USACE analyzed the impacts to sport fisheries including kokanee in 3.8 Fish and Aquatic Habitat, associated economic impacts in 3.11, and recreational impacts 3.14. The SEIS accounts for the types of impacts you have listed using available information in these sections. Quantitative estimates or modeling of survival or abundance changes for kokanee, for example, are not possible due to lack of available information. Based on analysis of available information, the SEIS describes that significant impacts to kokanee and the kokanee fishery because of the proposed deep drawdown can be expected. Mitigating impacts to recreation are not a statutory requirement of NEPA. USACE shaped the Detroit drawdown operation to minimize impacts to water quality, drinking water facilities, and recreation including sport fisheries. The local kokanee fishery at Green Peter Reservoir has experienced significant losses due to the deeper reservoir drawdowns. USACE expects a lesser impact on the kokanee fishery at Detroit, but the extent is uncertain. To reduce the impact, the proposed Detroit drawdown is scheduled for late fall/early winter when the fish are more spread out and the summer recreation season has ended. Future fishing opportunities would depend on a combination of natural reproduction and stocking rates, which are managed by ODFW.
Multiple[24]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	We urge USACE to: • Include in the SEIS a focused assessment of the kokanee population dynamics under deeper drawdown conditions (e.g., spawning redd exposure, altered shoreline habitat, cold-water refugia). • Compare impacts not only to anadromous fish but to resident fisheries whose value is measured locally and regionally. • Identify monitoring protocols and trigger-points (e.g., kokanee population decline beyond threshold) that would prompt adaptive management. • Propose mitigation measures (e.g., artificial spawning habitat, refuge water releases, timing of refills) to protect the kokanee fishery alongside the anadromous species goals.	The SEIS analyzes impacts to kokanee and other resident fishes in the reservoir, using available information. However, a model for kokanee population dynamics is not available. USACE quantitatively modeled hydrology and water quality, including reservoir volume and dam discharge and water temperatures, then qualitatively assessed the impacts to kokanee and other resident fish based on habitat changes from hydrology and water quality and dam passage conditions. The SEIS also assesses impacts to recreation and socio-economic impacts. USACE shaped the Detroit drawdown operation to minimize impacts to water quality, drinking water facilities, and recreation including sport fisheries. For example, to reduce the impact, the proposed Detroit drawdown is scheduled for late fall/early winter when the fish are spread out and the summer recreation season has ended.

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Multiple[25]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	4. The SEIS Does Not Demonstrate That the Preferred Alternative Will Benefit ESA-Listed Fish The purpose of the Detroit drawdown is to improve volitional downstream passage for juvenile Chinook and steelhead. However, the SEIS: • Provides no Detroit-specific survival modeling • Does not analyze effects on egg-to-smolt survival basin-wide • Acknowledges that downstream passage benefits are limited, seasonal, and involve tradeoffs harmful to other life stages. Additionally, NMFS's own Biological Opinion (2024) was completed without incorporating the massive new information from the Green Peter drawdown disaster, which has thus far show no measurable benefit to endangered fish populations. • New information invalidates key assumptions of the RPA • NMFS is obligated under ESA §7(d) to reinitiate consultation when new information reveals effects not previously considered • The SEIS cannot rely on a flawed Biological Opinion to justify the Preferred Alternative	Studies at other reservoirs have confirmed that drawdowns improve downstream passage and survival for juvenile salmon when these fish passthrough non-turbine outlets at shallower depths. (Appendix E, Chapter 6). The target drawdown pool elevation for the proposed Detroit Reservoir drawdown is 1395 feet which is 50 feet above the center line of the upper regulating outlets at Detroit Dam. Juvenile Chinook prefer to pass dams using outlets at depths of 50 feet or less, however some will dive over a hundred feet (especially when there is only one outlet operating). This operation would reduce the number of fish passing through the turbine penstocks and allow passage through the non-turbine regulating outlets. For example, survival of juvenile Chinook passing Green Peter Dam through the regulating outlets during the drawdown in fall is estimated at about 70%. This survival rate is higher than fish passing through WVS turbines thereby demonstrating a benefit compared to operations where mostly turbines are operated (i.e. without spring surface spill or without a deep drawdown to the RO in fall). The SEIS uses a downstream fish passage model, Fish Benefit Workbook (FBW), to compare the proposed SEIS Detroit interim operation to all alternative measures (Appendix E, Chapters 1 and 2). Lifecycle modeling of Chinook and steelhead population performance for the proposed SEIS Detroit interim operation was not completed. However, life cycle performance was qualitatively assessed using recent life cycle modeling for other passage measures.

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Multiple[26]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	The SEIS fails to show that the Detroit drawdown meaningfully contributes to salmon recovery, especially given the absence of modeled survival improvements and the lack of long-term passage infrastructure. We recommend that the Corps significantly expand sediment sampling downstream of existing drawdowns, which have mobilized large volumes of fine sediment. This information is critical because high suspended-sediment loads can smother redds, impair gill function in juvenile salmonids, and reduce aquatic insect production. Without a more comprehensive understanding of how mobilized sediment affects downstream fish habitat and population health, decision-makers and the public cannot fully evaluate the ecological consequences of the proposed operations.	The SEIS utilizes a downstream fish passage model, Fish Benefit Workbook (FBW), to compare the proposed SEIS Detroit interim operation to all alternative measures (Appendix E, Chapters 1 and 2). Lifecycle modeling of Chinook and steelhead population performance for the proposed SEIS Detroit interim operation was not completed. However, life cycle performance was qualitatively assessed utilizing recent life cycle modeling for other passage measures and understanding of previous drawdowns like those at Fall Creek. The drawdown at Fall Creek has been proven to be an effective operation for ensuring juvenile salmon survive their downstream migration. This information along with other analyses included in the SEIS and EIS, was used to estimated the effects of the proposed deep drawn down on Chinook and steelhead at Detroit in the SEIS. Pre-dam topographic conditions were surveyed in the 1950s and repeat bathymetric surveys were conducted in 2013 and 2025 to inform the sedimentation and turbidity analysis in the SEIS. Additional sediment sampling will occur in the summer of 2026. Real time turbidity data will be available during the fall deep drawdown at Detroit to help inform the decision maker. The EIS discloses that while designed to improve salmon and steelhead juvenile passage, the drawdowns would impact downstream aquatic habitat and aquatic life. The proposed Detroit reservoir drawdown would stir up fine sediment that has settled on the reservoir floor. High concentrations of suspended particles can irritate and clog fish gills, causing stress and making it difficult for them to breathe and find food. Fine sediment can cover redds reducing oxygen levels to eggs. To manage these types of risk, the proposal includes two key protections: 1) Phased Drawdown: The reservoir will be lowered cautiously in stages, not all at once. 2) Continuous Monitoring: Turbidity levels will be constantly measured at the dam's outlets. If the water becomes too muddy, the operation will be paused or stopped to allow the sediment to settle. This careful, monitored approach is designed to keep turbidity within levels down to protect the health of the fish that remain in the reservoir, as well as downstream. Other deeper drawdowns at WVS reservoirs have shown turbidity levels reduce significantly after the initial year, and the timing and duration of the drawdown can also influence turbidity along with seasonal weather patterns.

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Multiple[27]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	The USACE should not implement a deep drawdown at Detroit Reservoir until it can provide empirical data demonstrating that similar drawdowns—such as the recent operations at Green Peter and other Willamette Basin projects—have produced measurable, biologically meaningful benefits for endangered fish populations. At present, no evidence shows that these actions have definitively improved downstream survival, increased adult returns, or contributed to population recovery goals, while the documented harms to water quality, resident fish, and community water systems are substantial. Before proceeding with another high-risk drawdown, the Corps must present clear, site-specific data proving that these measures are effective and necessary for ESA- listed species recovery.	Studies at other reservoirs have confirmed that drawdowns improve downstream passage and survival for juvenile salmon when these fish passthrough non-turbine outlets at shallower depths. (Appendix E, Chapter 6). The target drawdown pool elevation for the proposed Detroit Reservoir drawdown is 1395 feet, which is 50 feet above the center line of the upper regulating outlets at Detroit Dam. Juvenile Chinook prefer to pass dams using outlets at depths of 50 feet or less, however some will dive over a hundred feet (especially when there is only one outlet operating). This operation would reduce the number of fish passing through the turbine penstocks and allow passage through the non-turbine regulating outlets. For example, survival of juvenile Chinook passing Green Peter Dam through the regulating outlets during the drawdown in fall is estimated at about 70%. This survival rate is higher than fish passing through WVS turbines thereby demonstrating a benefit compared to operations where mostly turbines are operated (i.e. without spring surface spill or without a deep drawdown to the RO in fall). The SEIS uses a downstream fish passage model, Fish Benefit Workbook (FBW), to compare the proposed SEIS Detroit interim operation to all alternative measures (Appendix E, Chapters 1 and 2). Lifecycle modeling of Chinook and steelhead population performance for the proposed SEIS Detroit interim operation was not completed. However, life cycle performance was qualitatively assessed using recent life cycle modeling for other passage measures and understanding of previous drawdowns like those at Fall Creek. The drawdown at Fall Creek is an effective operation for ensuring juvenile salmon survive their downstream migration. This information along with other analyses included in the SEIS and EIS, was used to estimated the effects of the proposed deep drawn down on Chinook and steelhead in the SEIS.
Multiple[28]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	5. The SEIS Fails to Analyze Reasonable Alternatives The National Environmental Policy Act requires evaluation of alternatives that avoid or minimize environmental harm. The SEIS should have evaluated: • Less severe drawdowns • Modified timing that avoids conflict with drinking water demand cycles • Fish passage improvements that do not rely on deep drawdowns • Revised Guide Curve (WCM) optimization, which our organization strongly supports • Accelerated structural fish passage solutions rather than repeated interim measures	USACE robustly evaluated nine alternatives in the SEIS the combined numerous measures, or actions, including less severe drawdowns. The alternatives considered structural modifications for passage, operational passage and combination of both. The operations analyzed included several different types of drawdowns of varying timing, duration, and elevations and detailed the effects of those operations on resources like drinking water. USACE did not analyze exceeding the rule curves in the WCM as that would increase flood risk which was constraint of the study because it posed an unacceptable risk to life safety. Chapter 5 explains why timeframes were not developed for each alternative.

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Multiple[29]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	Because these alternatives were not fully considered, the SEIS does not meet NEPA's requirements for a "rigorous and objective evaluation" of alternatives. Given the potential adverse consequences described above, the SEIS should thoroughly evaluate alternative operational regimes that balance fish-passage objectives with water-supply, recreation and resident-fish protections. Specifically: • Consider less aggressive drawdown alternatives (e.g., reduced depth of drawdown, shorter duration, timing shifts) that yield fish-passage benefit while limiting downstream impacts. • Incorporate a robust adaptive management framework with defined monitoring, performance metrics, stakeholder review periods and the ability to revert or modify drawdown operations if unacceptable impacts occur. • Provide for contingency plans for drought years or when municipal supply levels or recreation season viability is already compromised. • Clarify who bears risk and cost for recreation loss or water-supply shortfall (USACE, state/local agencies, municipalities, water-users).	Thank you for your comments. They will be taken under consideration.
Multiple[30]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	6. Requests Within the SEIS, the U.S. Army Corps of Engineers seems to acknowledge the shortcomings of the proposed drawdown by stating, "…the deep drawdown at Detroit Reservoir is expected to adversely affect water supply, water quality, drinking water (facility operation), and recreation. The effects of the drawdown on fish are mixed…" Given the deficiencies of the SEIS and the risks of the actions it proposes, we urge the U.S. Army Corps of Engineers to suspend implementation of the Detroit deep drawdown, until the agency can: • Request that the Department of Commerce and NMFS rescind and reinitiate the 2024 Biological Opinion, incorporating new information from Green Peter impacts. • Prepare a new SEIS that • Conducts full quantitative modeling of sediment, turbidity, refill probability, fish survival, and socioeconomic impacts. • Evaluates less harmful operational alternatives, including adjustments to the Guide Curve. • Integrates community-level economic analysis, not just regional modeling. • Ensure the availability of financial mitigation assistance to compensate local economies and businesses that could be undermined by the drawdown before implementing such a drastic measure. • Complete the study on turbidity mandated by Congress in 2024 WRDA legislation, before moving forward with a drawdown. • Engage directly with downstream drinking water providers to evaluate infrastructure risks and protective measures and ensure water systems are prepared for increased turbidity levels.	This statement from the executive summary was revised to clarify that the "effects of the drawdown on fish are mixed" because the drawdowns have different tradeoffs for different species and their different life stages. This statement was clarified in the final SEIS. The drawdowns do move fish downstream as they are designed to do. The SEIS provides quantitative modeling and analysis or qualitative analysis of all the requested areas. Quantitative analysis is not required under NEPA and USACE is not required to undertake new scientific or technical research unless doing so would be essential to a reasoned choice among alternatives and the overall cost and time frame would not be unreasonable. USACE updated the effects analysis in Section 3.11 Socioeconomics to include effects specific to the North Santiam Canyon area. NEPA does not provide USACE the authority or funding to provide financial assistance to local economies for possible impacts instead it is a procedural effort to inform the decision maker. USACE has engaged with the drinking water providers to better understand risks to the drinking water systems. The potential impacts to these systems have been updated in the final SEIS. USACE developed an Emergency Response and Communications Plan for previous drawdowns and would coordinate with North Santiam communities to include them in this plan. This effort is separate from the SEIS process. USACE would use real-time hydrology and turbidity data to modify the operation to improve conditions for fish and reduce adverse impact.

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Multiple[31]	City of Detroit; Detroit Lake Foundation; ConKraft Construction, Inc & Storage 4 Less; Independent Citizens	Conclusion In closing, while we support the fundamental goal of improving passage for ESA-listed anadromous fish species in the Willamette Basin, we believe the proposed deeper fall drawdown at Detroit Reservoir carries significant risks for municipal water supply reliability, recreation access, and kokanee fishery that together threaten to undermine public health and economic wellbeing of communities throughout the region. As outlined above, the SEIS does not sufficiently analyze or disclose the serious risks associated with the Detroit deep drawdown and does not demonstrate that the alternatives, including the Preferred Alternative, would provide measurable benefits to ESA-listed fish populations. The consequences for municipal water systems, public health, recreation, fishery resources, and the already fragile Santiam Canyon communities are severe and unacceptable. We respectfully request that USACE withdraw or modify the Preferred Alternative and undertake a more comprehensive, scientifically grounded evaluation of impacts and alternatives. We look forward to continuing engagement in this process and working collaboratively to ensure balanced outcomes. Thank you for your consideration of these comments.	Thank you for your comments. They will be taken under consideration.
Shelley Shirley	Independent Citizen	On behalf of residents, recreation users, and property owners in the Santiam Canyon, we submit comments on the Draft Supplemental Environmental Impact Statement (SEIS) for the Willamette Valley System. We strongly oppose the proposed deep late-fall/early-winter drawdown of Detroit Reservoir—particularly the Preferred Alternative (Alternative 5)—because it poses serious, inadequately analyzed risks to drinking water, public health, recreation, local economies, and resident fisheries, without credible evidence of meaningful benefit to ESA-listed salmon.	Thank you for your comments. They will be taken under consideration.

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Shelley Shirley	Independent Citizen	Key concerns: 1. Drinking water and public health risks are understated. More than 200,000 Oregonians rely on the North Santiam River for drinking water. The SEIS fails to meaningfully address turbidity risks from deep drawdowns, despite the 2023–24 Green Peter drawdown causing catastrophic turbidity and an estimated $37–40 million in damage to downstream water systems. The SEIS provides no sediment modeling, turbidity projections, refill probability analysis, or contingency planning for municipal water systems. This does not meet NEPA's requirement for high-quality scientific analysis.	The SEIS analyzed impacts water supply and turbidity with high quality available data including quantitative data where possible. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit based on model results. The impact is low because the drawdown would occur during the late fall and early winter during the season with the largest amount of precipitation. The drawdown operation would end about one month before the normal refill season would begin, meaning that USACE will have an entire month to regain the 55ft in elevation which can happen as quickly as hours or days. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill. The model results depicted also do not reflect how real-time water management can help to minimize impacts to reservoir elevations. USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. USACE developed an Emergency Response and Communications Plan for previous drawdowns and would coordinate with North Santiam communities to include them in this plan.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Shelley Shirley	Independent Citizen	2. Severe local economic and recreational impacts are minimized. Detroit Lake is one of the most heavily used recreational reservoirs in the Willamette Basin and is essential to the recovery of Detroit and Idanha following the 2020 wildfires. A deep drawdown would shorten recreation seasons, eliminate boat ramp access, damage tourism, and threaten community survival. The SEIS relies on regional economic models that obscure severe localized impacts and provides no refill modeling to assess whether summer recreation levels can be restored.	Appendix K evaluates impacts to recreation. A detailed analysis of water levels and how they could affect boat ramp access and recreation opportunities under each alternative are there. Figures 1-2 through 1-6 in Appendix K show the predicted range of water levels under different precipitation scenarios across the entire year at Detroit reservoir under each action alternative, the no action alternative, and interim operations. The elevations of each boat ramp at Detroit Reservoir are included in these graphs. Under interim operation during the median expected water year, the Mongold boat ramp would be unavailable from approximately the beginning of December through early/mid-January. This period is the least busy fishing period at Detroit Reservoir according to analyzed data. Only in extremely dry years (the bottom 5% of water years) boat ramp access expected to be significantly impacted during the remaining 10-11 months out of the year. In these years, access would be severely diminished across all alternatives considered and the impact would not be uniquely caused by the deep drawdown. The SEIS notes that the 2020 North Santiam River Subbasin wildfires resulted in substantial adverse effects on opportunities (See SEIS section 3.11 Socioeconomics, section 3.11.3.1 Methodology and section 3.6, Vegetation, Section 3.6.2.3, 2020 Wildfires). As it relates to compounding impacts, USACE updated SEIS Section 3.11.2.1 Socioeconomics to more clearly describe the relationship between socioeconomic impacts and location specific impacts. The effects criteria section of the SEIS (Section 3.11.3.1 Methodology) mentions the importance of degree and scale of effects. Effects of employment industry adjustments specific to a community connection to the landscape and community identity cannot be known with certainty, therefore the updates to these sections speak to the scale of the Environmental Consequences analyses completed.
Shelley Shirley	Independent Citizen	3. Kokanee fishery impacts are ignored. The SEIS acknowledges potential “significant reductions” in resident fish but offers no population modeling, mitigation, or monitoring for the kokanee fishery—a critical ecological and economic resource. The Green Peter drawdown effectively eliminated its kokanee fishery, yet the SEIS offers no evidence Detroit would fare differently.	USACE analyzed the impacts to sport fisheries including kokanee in 3.8 Fish and Aquatic Habitat, associated economic impacts in 3.11, and recreational impacts 3.14. The SEIS accounts for the types of impacts you have listed using available information in these sections. The local kokanee fishery at Green Peter Reservoir has experienced significant losses due to the deeper reservoir drawdowns. However, studies at Green Peter confirmed that the drawdown was effective at improving downstream passage and survival for juvenile Chinook salmon, which is the primary goal of the proposed drawdown at Detroit. Although there could still be significant impacts to the kokanee fishery, a late-fall drawdown schedule would help reduce impacts on both the kokanee fishery and the peak summer recreation season, thereby reducing economic disruption.

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Shelley Shirley	Independent Citizen	4. No demonstrated benefit to ESA-listed fish. The SEIS provides no Detroit-specific survival modeling and relies on a 2024 NMFS Biological Opinion that did not incorporate new data from Green Peter. There is currently no empirical evidence that deep drawdowns have produced measurable improvements in salmon survival or recovery, while documented harms are substantial.	Studies at other reservoirs have confirmed that drawdowns improve downstream passage and survival for juvenile salmon when these fish passthrough non-turbine outlets at shallower depths. (Appendix E, Chapter 6). The target drawdown pool elevation for the proposed Detroit Reservoir drawdown is 1395 feet, which is 50 feet above the center line of the upper regulating outlets at Detroit Dam. Juvenile Chinook prefer to pass dams using outlets at depths of 50 feet or less, however some will dive over a hundred feet (especially when there is only one outlet operating). This operation would reduce the number of fish passing through the turbine penstocks and allow passage through the non-turbine regulating outlets. For example, survival of juvenile Chinook passing Green Peter Dam through the regulating outlets during the drawdown in fall is estimated at about 70%. This survival rate is higher than fish passing through WVS turbines thereby demonstrating a benefit compared to operations where mostly turbines are operated (i.e. without spring surface spill or without a deep drawdown to the RO in fall). The SEIS uses a downstream fish passage model, Fish Benefit Workbook (FBW), to compare the proposed SEIS Detroit interim operation to all alternative measures (Appendix E, Chapters 1 and 2). Lifecycle modeling of Chinook and steelhead population performance for the proposed SEIS Detroit interim operation was not completed. However, life cycle performance was qualitatively assessed using recent life cycle modeling for other passage measures and understanding of previous drawdowns like those at Fall Creek. The drawdown at Fall Creek is an effective operation for ensuring juvenile salmon survive their downstream migration. This information along with other analyses included in the SEIS and EIS, was used to estimated the effects of the proposed deep drawn down on Chinook and steelhead in the SEIS.
Shelley Shirley	Independent Citizen	5. Reasonable alternatives were not adequately analyzed. The SEIS fails to rigorously evaluate less harmful alternatives, including shallower or shorter drawdowns, timing changes, Guide Curve optimization, or non-drawdown fish passage solutions, as required by NEPA.	USACE robustly evaluated nine alternatives in the SEIS the combined numerous measures, or actions, including less severe drawdowns. The alternatives considered structural modifications for passage, operational passage and combination of both. The operations analyzed included several different types of drawdowns of varying timing, duration, and elevations and detailed the effects of those operations on resources like drinking water. USACE did not analyze exceeding the rule curves as that would increase flood risk which was constraint of the study because it posed an unacceptable risk to life safety.
Shelley Shirley	Independent Citizen	Request: We urge the U.S. Army Corps of Engineers to suspend implementation of the Detroit deep drawdown until it can: • Reinitiate ESA consultation using updated Green Peter data • Conduct quantitative modeling of turbidity, sediment, refill probability, fish survival, and localized economic impacts • Fully evaluate less damaging operational alternatives • Complete the turbidity study mandated by Congress • Engage directly with downstream drinking water providers and affected communities We support salmon recovery, but not at the expense of public health, drinking water reliability, local economies, and resident fisheries—especially without evidence the proposed action works.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Tracee Hencricks	Independent Citizen	The removal of hydroelectricity is a major concern to all affected population here from Detroit to Salem. How are you planning to compliment the reduction?	The SEIS quantified the amount of power lost to ceasing hydropower operations under Alternative 6. However as stated in SEIS Chapter 3.12 Power Generation and Transmission, Bonneville Power Administration did not provide an analysis of regional power system reliability, transmission system, and economic viability of power generation impacts. How power marketers balance the grid, ensure power to the region remains reliable, or the potential costs to ratepayers from losing the existing source of low emission, renewable power are outside of USACE's jurisdiction and control.
Tracee Hencricks	Independent Citizen	Algae considerations: Will they be monitored through water and soils. With drawdown is soil analyzed for algae growth and changes?	At present, available scientific methods do not allow reliable, site-specific prediction of cyanotoxin mobilization from sediments, given uncertainty in the environmental triggers governing toxin production and release. USACE does monitor water quality conditions and notifies the state of Oregon when harmful algae blooms occur so they can monitor and test water conditions.
Rebecca Raikes	Independent Citizen	One of my many concerns about this drawdown routine is related to the arsenic that is concentrated and settled at Big Cliff. How will you monitor arsenic levels downstream once you open the gates and how will you protect downstream waterways and drinking water systems?	Based on analysis of data collected in 2013 from Detroit Reservoir, arsenic was below the natural background levels found in regional soil (19mg/kg). No sediment chemistry data was collected in 2013 at Big Cliff however the sediment composition consists of 90% sand/gravel and 8% fine particles. Arsenic primarily binds to fine-grained particles. Future sediment sampling is expected this spring.
Sharrice Pendergraft	Independent Citizen	Please make sure you test the water quality regularly. Weekly during active drawdown and monthly each month for the 12 months after completion at least.	Thank you for your comments. They will be taken under consideration.
Bill Jepsen	Independent Citizen	The word I here at the meetings is "assume", I need to remind you 5 years ago there was an assumption that was made about a fire putting itself out that not only killed people, but devastated the lives of thousands. The community of Detroit is in the beging stages of rebuilding & repairing. The last thing that needs to be done is for someone to assume that this is going to work. Instead of making an assumption please let this community recover & thrive which in return will provide you revenue to perform the correct research not only affecting fish but also humans My request is that you carry on with this assumption that you will provide this community with mental & financial help. There are people in Detroit that put food on the table for their families and this assumption could destroy the way people provide. These humans have suffered enough.	Thank you for your comments. They will be taken under consideration.
Denni Hudson	Independent Citizen	First of all I'd like to say that whom ever "organized" this meeting obviously did not really want to hear from the community of Stayton. This is not a meeting, it's chaos. And you know what they say, Army Corp: how you do one thing is how you do anything. This entire project is wholesale chaos. There seems to have been no real thought given to the people who depend on water from Detroit lake. I want to know who planned this drawdown without thought for people who are served by the waters of Detroit lake, so that I can be sure they are fired - what an idiot! What a waste of tax dollars. So my suggestion would be to call a halt to this little adventure, actually think about before you begin. Ask yourself how else this could be done, begin stocking a huge warehouse with water for the people, animals, crops that are not going to survive without clean water. We pay tazes for the Army Corp to NOT act like fools. Also have the guts to stand up in front of the crowd so we can all hear your responses. Unless you're afraid to do so.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Leland Jossy	Independent Citizen	I am concerned about the fact that Green Peter Dam is considered to be removed. We need to have fish ladders operational but the silt has built up and prevented effective operation. Dredging is the answer, why is this not considered	Dam removal was considered but dismissed from further analysis because it violated the measure screening criteria that used increased flood risk as constraint due to an unacceptable risk to life safety. USACE built the WVS dams without fish ladders, with the exception of Green Peter, and installation of fish ladders would be ineffective given the height of these high head dams. USACE is very effective in moving fish above the dams via trap and haul operations at its adult fish facilities. The most limiting factor in fish passage is moving juveniles' safely downstream. The EIS is evaluating how to move juvenile listed species safely downstream while continuing to operate and maintain the adult fish facilities that more fish upstream. Dredging will not improve downstream fish passage.
Wendy Phelps Chapman	Marian Estates Senior Living	I read in the paper this week that there will be a truck that is bringing salmon back up the canyon. My question is this: if they can be trucked back up the canyon, why can't they be trucked back down the canyon in the first place?	Trucking juvenile salmon or steelhead migrating downstream requires a means to collect them. The SEIS looks at structural modifications to Detroit Dam to construct a juvenile collection system at the dam where juveniles congregate when they are migrating downstream. However, designing, funding, and constructing a permanent facility is a multi-year process. Under the Endangered Species Act, USACE must take action to improve fish passage now, not just years in the future. The drawdown will increase passage until a different downstream passage solution is operational.
Wendy Phelps Chapman	Marian Estates Senior Living	2nd question: why is there not dredging happening to get the majority of the turbidity out of the water?	Dredging wouldn't inherently reduce the amount of turbidity mobilized during a drawdown as sediment is mobilized from the mudflat at the head of the reservoir and from run off when precipitation hits the exposed shoreline. Further, dredging accumulated sediment from Detroit Reservoir would be a large scale, expensive industrial project. Dredging would require planning, permitting, land acquisition for dredge disposal sites, specialized dredging equipment acquisition and mobilization, dewatering and disposal. USACE would implement the proposed deep drawdown at Detroit over several years and closely monitor turbidity levels in coordination with downstream communities. Incrementally drawing the reservoir down to the target elevation over several years would allow the river to naturally redistribute some of the newly exposed sediment downstream into the residual pool instead of carrying it downstream.
Wendy Phelps Chapman	Marian Estates Senior Living	The sewer system in Stayton handles all sewage from Sublimity. If that system is damaged, or shut down to prevent damage, there is no place for the sewage in Sublimity to go. All of the press is covering the issue of "Drinking Water". We have plenty of our own drinking water. What we do not have is a sewage treatment plant. So if Stayton's is damaged our sewage has nowhere to go! So what then? Is there a definitive plan for what is going to be done if this happens? Or better yet, is there a plan to ensure that this does not happen? This is a major concern for our senior population. And it seems like no one is addressing it. No one is talking about it. It is not being covered or talked about on the News or in the Newspapers. This is very frustrating for those who live in Sublimity and the surrounding community.	USACE updated Section 3.19.4.1 to identify adverse effects to the City of Sublimity and Stayton wastewater facilities. USACE developed an Emergency Response and Communications Plan and would coordinate with North Santiam communities to include them in this plan. This effort is separate from the SEIS process. USACE would use real-time hydrology and turbidity data to modify, pause or cease the operation to improve conditions for fish and reduce adverse impact.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Roger Bell	Independent Citizen	Decommission hydropower plants: Section 334 in HR 8812 (SEC 334) is concerning and the verbiage of the paragraph is at best confusing. Why would anyone consider decommissioning functional hydropower plants at any dam? We are experiencing high demand on the power grid already and the demand is forecast to only increase. I talked to Andrew at Congresswoman Andrea Salinas's office this afternoon and he informed me that this requirement to justify the continued hydropower operation has been in the Water Resources Development Act for several of the preceding biennium. As such, I'm again confused as to why this item is in a Supplemental EIS as it was addressed in the verbiage of the completed Final EIS that is now delayed for approval and plan implementation. Per the Willamette Valley System Operations and Maintenance Final Environmental Impact Statement, Chapter 2, Alternatives. Paragraph 2.9 - Alternatives Considered but Eliminated from Further Review. As noted above, measures were combined to form distinct alternatives with a particular management strategy. Two potential alternatives were considered but eliminated from further review. A hydropower-only alternative was determined not to be distinctive enough from other action alternatives considered and was, therefore, eliminated from further review. After development of the alternatives and identification of measures to be implemented under each of the alternatives, USACE determined that a hydropower-only alternative was not necessary because measures that would benefit hydropower production were integrated into other action alternatives. Conversely, an alternative to eliminate hydropower (a Congressionally authorized purpose) was also eliminated from further review for several reasons as described in Appendix A, Alternatives Development, Attachment 1, Initial Measures Screening.	Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects two years after USACE issued the Draft EIS. USACE determined supplementing the Final EIS was the best way to address WRDA 24 by including an alternative that was previously considered but dismissed.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Roger Bell	Independent Citizen	In an effort to understand why anyone would even consider decommissioning a hydropower plant, I went to the USACE web site and was able to find the following information without any effort: From the USACE web site - Hydropower Program The U.S. Army Corps of Engineers {USA CE} Hydro power Program is the largest generator of hydropower in the US, with 75 power-producing dams housing 356 individual generating units. USACE's hydropower assets generate more than 70 billion kilowatt hours per year of clean renewable energy. This clean energy is enough to power 10 cities the size of Seattle. Additionally, the revenue generated by the USA CE hydropower fleet is used to repay the original construction costs of the hydropower projects and to fund the operation, maintenance and modernization investments of the hydropower fleet. Did you know? • USACE Hydropower is the largest renewable energy producer in the US • 1 out of every 4 Megawatts of hydropower in the US is generated by our plants • USACE Hydropower is the 5th largest electric supplier in the US • USA CE hydroelectric plants save 50 million metric tons of carbon dioxide-equivalent emissions per year • Our technicians work 24 hours a day, 7 days a week, 365 days a year and minute-by-minute to monitor energy production I'm left with the nagging questions: Who at the congressional level doesn't understand that decommissioning functioning hydropower plants is just stupid? In addition, why does it keep coming up as an action item for USACE when it should be changed to an action item for whichever national level agency oversees national power grid maintenance and sources? If this action item is being driven by a state agency, then the solution to increasing power availability for the grid still wouldn't be the responsibility of the USACE, but they should be an invited member of any discussions to propose solutions to the ever-increasing need for power.	Thank you for your comments. They will be taken under consideration.
Roger Bell	Independent Citizen	Deep drawdown at Detroit Reservoir: Why would anyone suggest a course of action that has a demonstrated negative impact on habitats and communities. Alternative 5 of the Final EIS has interim and long-term proposals for the downstream migration of the fish that do not have a negative effect on the rest of the environment downstream. If there is truly a danger that the fish mentioned will go extinct within the next five years if the current EIS is followed, then push to get congress to allocate sufficient funds to advance the long-term solutions forward and get some outside the box thinkers to look at some interim methods to get the fish downstream. If the deep drawdown is the best solution that the folks at the NMFS can come up with to increase downstream migration for the fish, then it's time to get some new people who are better at problem solving to look at the issue. This is not a situation that can be addressed by only considering a narrowly focused alternative, and it appears that the problem solvers at the NMFS are more focused on the fish over the rest of the environment.	Thank you for your comments. They will be taken under consideration.

Dave White	n/a	You approve of 36 trillion in debt? Trillions in waste? 34 PPM fraud in the CO2 rise and 36 NOAA PhDs fired. i.e.: Kathryn McCaincctruth .org signup for class action lawsuit against Multnomah County for $52 billion. Radiation heat transfer rate, q [W/m2], from a body (e.g. a black body) to its surroundings is proportional to the fourth power of the absolute temperature and can be expressed by the following equation: q= £U°f4where a is a fundamental physical constant called the Stefan-Boltzmann constant, which is equal to 5.6697x 1 o-s W/m2K4. The Stefan-Boltzmann constant is named after Josef Stefan (who discovered the Stefa-Saltzman law experimentally in 1879) and Ludwig Boltzmann (who derived it theoretically soon after). As can , radiation heat transfer is important at very high temperatures and in a vacuum. The atmosphere drains to a vacuum of space. -makingsenseofcovid.com illegal gain of function masks and death jabs are not the solution. -Federal Court, Judge Alsup ruled that only Congress can hire and fire federal workers, not the president. However, as you know, the US Constitution states the President is the Chief Executive of the Executive branch of the Federal Government and its bureaucratic employees. He can hire and fire anyone if congress appropriates the money. This explains why the US Supreme Court wrote a stay for the $2 billion going out of the country for USAID. https://www.npr.org/2025/02/27/nx-s1-5311445/federalemployees-firing-court-judge -https://usafacts.org/articles/how-many-people-receive-government-assistance/ 100 million people on entitlements. https://federalsafetynet.com/entitlement-programs/entitlement-spending/ $3363 billion that is $3.4 trillion per year. At least $500 billion waste per year. Musk's DOGE team is changing entitlement checking to two years and removing illegal aliens from SSI. -https://www.opb.org/article/2023/08/05/columbia-river-salmon-habitat-spending-study/ Or https://salmonproectiondevice.com/Billions spent on%20hatcheries.pdf -Salmonprotectiondevice.com will fix the declining salmon and sturgeon runs in the Columbia River within a few years. The Sea Lions have always been the issue for the declining runs.-https://thelawisyourattorney.com/judicial-bias-against-litigants-in-dam-removal-cases/ Wave phenomena decreases by x-4 by distance. The earthquake which is over 100 miles direct west of garibaldi will only be around 6 in strength for the Willamette valley 160 miles away. This can be confirmed by previous earthquakes and the damage area is not more than 50 miles depending on the strength. Judge John J. McConnell has zero jurisdiction to make a nationwide ruling on snap. The Supreme Court already ruled on illegal nationwide injunctions they are illegal also. Do you realize 5 million people left the democrat party this year. In addition, many liberal polls say only 19% of Americans wanted the government shutdown. That is the declining democrat's base. Illegal criminal aliens do not deserve health care. Democrat shutdown. Using the pain inflicted by the shutdown as leverage. If you want cheap healthcare move to Mexico. American doctor for $50 or less RX less than $20. The issue with healthcare is not enough doctors and Nurses. Root cause analysis says this is because not enough Doctors to get paid around $180,000 per year vs. $400,000 private practice. Nurses who teach around $80,000 a year. Graduates get paid $100,000 to $120,000.Therefore, the solution is to change pay for	Thank you for your comment. We will take it under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
		who teach to $350,000 a year and Nurses who teach to $120,000 a year. This will only cost $50 million a year. Then in 6 to 8 years, we will have a doctor everywhere for$50 a visit. President Trump is lowering RX prices. Judge John J. McConnell has zero to make a nationwide ruling on snap. The Supreme Court already ruled on illegal nationwide injunctions they are illegal also. https://thelawisyourattorney.com/judicial-bias-against-litigants-in-damremoval-cases/ https://thelawisyourattorney.com/epc-cant-regulate-greenhouse-gases/ https://thelawisyourattorney.com/dei-is-illegal/https://thelawisyou attorney. com/-bright-enterprises/ https://thelawisyourattorney.com/sample-page/unethical-judge-bailey/ in default since 10/17/2025 https://thelawisyourattorney.com/us-supreme-court-i n-24a 1079/ Judges can only issue injunctions in their district not nationwide https://thelawisyourattorney.com/cities-cant-be-sanctuary-cities-anymore/ 25A264 (25-332) https://www.supremecourt.gov/opinions/24pdf/25a264_o759.pdf Executive powers of Article two of the U. S Constitution belong to one person the President of the United States. https://thelawisyourattorney.com/absolute-judicial-immunity-is-a-myth/ https://thelawisyourattorney.com/writs-in-u-s-supreme-court/ 4 in default and four distributed for conference. https://thelawisyourattorney.com/antifa-as-a-terrorist-group/ https://thelawisyourattorney.com/devill ier-vs-texas-docket-22-913/ https://thelawisyourattorney.com/treason-is-1 8-usc-115/ All courts must be article Ill of the US Constitution. Chevron doctrine is illegal Agencies like FERC and EPA cant cherry pick data for their false agenda. Stare decisis must be vertical to the Constitution, not horizontal. This isbecause any other case can't to have enough similarities to warrant use unless the Judge and counsel on both sides have read case transcripts, exhibits and final ruling.	
Joseph Moritz	Kokanee Power of Oregon	Kokanee Power of Oregon (KPO) submits this formal request for the release of all scientific data, modeling, and analyses related to the Green Peter Reservoir drawdown and its impacts on fisheries, water quality, and downstream communities. As the Corps is now proposing a similar drawdown at Detroit Reservoir, transparent disclosure of Green Peter outcomes is essential for public trust and informed decision-making.	USACE included data and modeling of the previous drawdowns to support the effects analysis in Chapter 3. The water quality and fish modeling included turbidity impacts and describe the impact of turbidity on sport fish like kokanee. The modeling and the information requested can be found in the hydrology, water quality, water supply, and fish technical appendices of the SEIS (Appendix B, Appendix D, Appendix J, and Appendix E).

Commenter Name	Commenter Affiliation	Comment	USACE Response
Joseph Moritz	Kokanee Power of Oregon	Specifically, KPO requests: 1. Fish-survival data • Juvenile Chinook passage and survival rates • Kokanee and trout mortality data, including barotrauma analysis • Impacts to downstream redds noted by agency field staff 2. Water-quality and turbidity data • Turbidity levels above and below Foster Dam • Sediment transport measurements • Impacts on municipal water-treatment operations 3. Ecosystem impacts • Spawning-habitat assessments • Modeling of siltation impacts under varying hydrologic conditions, including high-flow events • Any emergency-response or mitigation actions taken 4. Economic and recreational impacts • Impacts on local marinas, campgrounds, and recreation-dependent businesses • Impacts on reservoir-based fisheries 5. Fish-passage effectiveness analysis • Quantitative evaluation of whether smolt downstream migration improved • Comparative modeling of Detroit outcomes if similar drawdown methods were deployed	USACE included data and modeling of the previous drawdowns to support its effects analysis in Chapter 3. The water quality and fish modeling included turbidity impacts and impacts to sport fish like Kokanee. The modeling and the information requested can be found in the hydrology, water quality, water supply, and fish technical appendices of the SEIS (Appendix B, Appendix D, Appendix J, and Appendix E). NEPA does not require federal agencies to undertake new scientific or technical research unless doing so is essential to a reasoned choice among alternatives and the overall cost and time frame is not unreasonable. USACE has determined that it has sufficient data and modeling, including much of the requested information, in the EIS and that the additional information requested would not help differentiate between alternatives or would be untimely in informing the decision.
Joseph Moritz	Kokanee Power of Oregon	The Corps' Detroit proposal cannot be credibly evaluated without these baseline data. As stated at the December 5, 2025 meeting, there is widespread concern that the Green Peter drawdown caused significant harm to kokanee populations, trout, Chinook smolts, and downstream habitat, with little to indicate clear salmon-passage benefits. KPO also reiterates its request that the Corps clarify whether it has thoroughly evaluated alternative fish-passage strategies-such as seasonal upper-reservoir smolt-collection weirs that could achieve juvenile-Chinook transport objectives without the catastrophic losses to kokanee and resident trout seen at Green Peter.	The concept outlined—collecting juvenile fish and transporting them past the dam—is the foundation of Measure 392 which was analyzed as part of the SEIS. However, Measure 392 collects the juvenile fish in the reservoir instead of at the head the reservoir as the commentor suggest. USACE, with input from ODFW, NMFS and others, conceptually discussed a collection system at the upper end of the reservoir or in the tributary rivers or streams, but screened it from inclusion in the SEIS because collection at those sites is difficult as the upper end of the reservoir fluctuates. Collection within the rivers above the reservoir is also complicated by large amounts of debris, and the need to collect primarily small juvenile (fry) migrating downstream in spring during periods of high flow. So, most of the river would need to be diverted through a screened system to collect the migrating juveniles. Collecting fry (< 50 mm in length) and safely and effectively separating them from debris carried into a collection system would cause high risks of injury and mortality for species and high operational costs. For these reasons these concepts were not carried forward for more detailed review.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Joseph Moritz	Kokanee Power of Oregon	Research impacts Detroit Reservoir is presently the site of a multi-year scientific study evaluating anti - microbial treatments and fish-health outcomes. This research relies on stable reservoir conditions, accessible sampling locations, and intact thermal structure. A large drawdown would jeopardize or destroy years of work that supports regional salmon-recovery planning. We request confirmation of receipt and a timeline for delivery of the requested data sets. If any materials are unavailable, we request an explanation as to why.	Detroit and other WVS reservoirs are not stable environments under current operations. The reservoirs are drafted by late fall each year to their lowest elevation and then refilled up to the maximum conservation pool elevation each spring. Water temperatures in Detroit and other large WVS change seasonally throughout the year. Primary and secondary fish production vary annually due to the seasonal operations and environmental variability affecting inflows and temperatures. References for data and studies used in the analysis are in SEIS Chapter 10. Additional information is available online at the following websites: https://public.crohms.org/tmt/documents/FPOM/2010/Willamette_Coordination/ and https://public.crohms.org/tmt/documents/FPOM/2010/Willamette_Coordination/WFSR/ . USACE delayed implementation of the deeper drawdown of Detroit in the fall for juvenile fish passage, as required by the NMFS 2024 BiOp, to evaluate the operation in the SEIS and to allow for public comment to inform the operation. USACE must comply with all applicable laws and Treaties in its operation and maintenance of its projects.
Rebecca Chu	EPA	The U.S. Environmental Protection Agency has reviewed the U.S. Army Corps of Engineers' November 14, 2025, Draft Supplemental Environmental Impact Statement for the Willamette Valley System Operations and Maintenance. The DSEIS evaluates the effects of ceasing hydropower production at the WVS dams, and deeper fall drawdown of Detroit Reservoir. Pursuant to the National Environmental Policy Act and Section 309 of the Clean Air Act, the EPA is required to review and comment publicly on any proposed federal action subject to the NEPA's environmental impact requirement. The EPA's review identified that the proposed project may have reasonably foreseeable adverse impacts on water supply and quality. The DSEIS maintains the programmatic water quality and quantity goals and objectives in the FEIS.1 As the supplemental analysis considers a new set of operating conditions, the EPA recommends the Final SEIS consider and describe monitoring and adaptive management updates to assess whether the goals are achieved, and mitigation efforts are effective. The EPA appreciates the Corps' commitment to conducting separate NEPA analyses for individual projects and plans in the Willamette Basin.	Thank you for your comments. They will be taken under consideration.
Karen & George Vigeland	Independent Citizen	We (George and Karen Vigeland) feel that it is urgent to express our absolute horror regarding the potential drawdown of Detroit Lake. There are innumerable disasters that would result from this plan. It is a threat to water quality, the environment, public safety and economic recovery. I realize that the determination of this order for the drawdown was made far from Detroit and long before the devastating fires of 2020. The decision needs to be revised--in current time!	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Karen & George Vigeland	Independent Citizen	Our Concerns: 1. Water Purity. Salem depends on Detroit for its water supply. A drawdown will create muddy waters which will overwhelm existing purification systems. LIVES ARE AT STAKE!	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation each year to improve conditions for fish and reduce adverse impacts that may occur.
Karen & George Vigeland	Independent Citizen	2. Our family has owned property on the banks of the reservoir for over 55 years. The lake has always been full from spring to mid-September- until recent years. Management of the reservoir needs to be revised due to the many changes over the years. There are many more demands on the water from the reservoir. Environmental changes due to the wildfires have caused earlier runoff due to decreased snowpack shade. These earlier runoffs are not being captured! The current 'fill curve' is out of date and needs revision.	Updating the rule curve is beyond the scope of the SEIS. Studying changes to the rule curve would impact USACE's flood control mission due to posing an unacceptable risk to life safety, thus were screened out from consideration as part of this effort.
Karen & George Vigeland	Independent Citizen	3. Wildfires have increased all across the Western US. We have seen Detroit Lake used as a source for water as planes scoop in and retrieve the water. KEEP IT FULL! Detroit Lake is a defense against future fires, which are predicted to continue.	The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. During the drawdown, a large pool would remain.
Karen & George Vigeland	Independent Citizen	4. We have seen firsthand the devastation of the economy in the Detroit area. The entire Santiam Canyon is struggling to rebuild after the Labor Day 2020 fires. A drawdown at this point will strike a FINAL BLOW to the fragile economy of the entire Canyon.	Thank you for your comments. They will be taken under consideration.
Karen & George Vigeland	Independent Citizen	5. We have seen the results from previous drawdowns where thousands of dead Kokanee and other fish are on dry land. Please do not do that to Detroit!	Thank you for your comments. They will be taken under consideration.
Karen & George Vigeland	Independent Citizen	6. We are also concerned to know if the goals of this drawdown are warranted. What are the statistics of the salmon run before the Detroit Dam? The other considerations for human health and survival should outweigh the concerns for salmon.	In the years just before Detroit Dam was built adult Chinook salmon and winter steelhead runs in the North Santiam numbered in the thousands. Studies show that juvenile salmon have higher survival rates when they pass WVS dams through non-turbine outlets at shallower depths (which this operation facilitates)(Appendix E, Chapter 6). Although it is too soon to see the results for adult Chinook salmon from the recent drawdowns at Green Peter, juvenile kokanee salmon that passed through the dam during these operations have returned as adult sockeye salmon after foraging in the ocean. The drawdown at Fall Creek has proved to be an effective operation for ensuring juvenile salmon survive their downstream migration. While this has unfortunately come at the cost of the local fishery for resident fish in Fall Creek Reservoir, results demonstrate this operation has increased adult salmon returns over time compared to pre-drawdown conditions.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Karen & George Vigeland	Independent Citizen	We fled for our lives on Labor Day 2020 when wildfires descended on Detroit. We had no warning. We were fortunate our neighbor called to say 'Get Out Now!'. We lost our home. We believe in Detroit, so we have rebuilt. We hope we don't lose it again due to outdated edicts.	Thank you for your comments. They will be taken under consideration.
Greg Gilham	Independent Citizen	I served as the lead field biologist for the Oregon Department of Fish and Wildlife (ODFW) on the Biological Opinion (BiOp) study of Chinook salmon above Detroit Reservoir for seven years. During that time, I surveyed and monitored the North Santiam River, the Breitenbush River, Detroit Reservoir, and the North Santiam River downstream of Detroit and Big Cliff Dams. My work focused on the Chinook salmon life cycle - from eggs to fry, parr, and smolt - using extensive field methods including floating and snorkeling surveys, trapping, electroshocking, PIT tagging, radio tracking, and operation of screw traps both above the reservoir and below Detroit and Big Cliff Dams. Over the course of this project, I personally documented and counted thousands of dead fish below both dams. These mortalities were consistently associated with turbine damage, spill related injury, and nitrogen gas supersaturation. These impacts were evident below Detroit Dam but were even more severe below Big Cliff Dam. We also conducted controlled experiments using Chinook smolts and rainbow trout from Marion Forks Hatchery. Fish were placed in the live box of a screw trap for short periods, and the results were consistent: high mortality. These findings demonstrated that even fish that survived passage were often killed by water toxicity associated with gas supersaturation. When Big Cliff Dam spills, dissolved gas levels have been measured at approximately 128% saturation as far downstream as Niagara, 2.5 miles below the dam. This indicates that gas levels immediately below the dam are substantially higher and biologically lethal. To further investigate these conditions, another field biologist and I conducted a snorkel survey from Big Cliff Dam downstream to the Minto trap. We observed no fish of any species throughout this entire reach. We also documented the presence of Didymosphenia geminata ("rock snot"), an invasive algae species typically associated with very cold, low-oxygen, dam regulated waters. ODFW policy directs all wild Chinook and winter steelhead trapped at Minto to be released upstream to spawn in this reach above Minto Dam. Based on my observations, this practice is ineffective. Elevated dissolved gas levels abrade fish eggs, allowing fungal and bacterial infections that result in near-total egg mortality.	The amount of TDG that would occur as result of an action can be found in SEIS Section 3.5 Water Quality. The effects of water quality on fish can be found in SEIS Section 3.8 Fish and Aquatic Habitat. The policies of ODFW and are outside the scope of the SEIS.
Greg Gilham	Independent Citizen	Based on my experience and field data, I do not believe the proposed plan will be successful or cost-effective. It is likely to result in continued fish mortality, increased turbidity affecting downstream municipalities, and the expenditure of millions of dollars with no meaningful biological benefit. A more effective approach would be to focus on improving downstream habitat. One proven alternative would be the creation of a managed spawning channel, similar to the successful Upper Willamette River spawning channel operated by ODFW. A potential location could be the Knife River-Stayton property, which was previously used for raising fall Chinook.	Habitat projects will continue in the Willamette Valley System and site specific environmental compliance documentation, like NEPA, will occur prior to construction.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Greg Gilham	Independent Citizen	Proceeding with the proposed plan would also eliminate significant recreational opportunities, including the destruction of a highly popular kokanee fishery, while degrading water quality for downstream communities and increasing treatment costs; again, with no demonstrable improvement in fish survival or recovery.	The SEIS analyzes impacts to kokanee and other resident fishes in the reservoir, using available information. However, a model for kokanee population dynamics is not available. USACE quantitatively modeled hydrology and water quality, including reservoir volume and dam discharge and water temperatures, then qualitatively assessed the impacts to kokanee and other resident fish based on habitat changes from hydrology and water quality and dam passage conditions. The SEIS also assesses impacts to recreation and socio-economic impacts. USACE shaped the Detroit drawdown operation to minimize impacts to water quality, drinking water facilities, and recreation including sport fisheries. For example, to reduce the impact, the proposed Detroit drawdown is scheduled for late fall/early winter when the fish are spread out and the summer recreation season has ended. Studies at other reservoirs have confirmed that drawdowns improve downstream passage and survival for juvenile salmon when these fish passthrough non-turbine outlets at shallower depths. (Appendix E, Chapter 6). The target drawdown pool elevation for the proposed Detroit Reservoir drawdown is 1395 feet which is 50 feet above the center line of the upper regulating outlets at Detroit Dam. Juvenile Chinook prefer to pass dams using outlets at depths of 50 feet or less, however some will dive over a hundred feet (especially when there is only one outlet operating). This operation would reduce the number of fish passing through the turbine penstocks and allow passage through the non-turbine regulating outlets. For example, survival of juvenile Chinook passing Green Peter Dam is estimated through the regulating outlets during the drawdown in fall at about 70%. This survival rate is higher than fish passing through WVS turbines thereby demonstrating a benefit compared to operations where mostly turbines are operated (i.e. without spring surface spill or without a deep drawdown to the RO in fall).
Arlie Janzen	Independent Citizen	I attended the evening session at the Stayton Community Center this month. I had hoped to hear persons express their point of view on the mandated Detroit Lake drawdown. I've been reading the articles published by Zach Urness in the Statesman Journal. What I hear thus far is genuine concern of the silt potentially damaging filtration systems of various towns along the way. What I DON'T hear is any discussion of sewage discharge for Sublimity if Stayton doesn't have water. Should there be a filtering breakdown in the town of Stayton, Sublimity won't be fine because we need Stayton's water to move our sewage! We have our own water, but rely on Stayton's water system to move our sewage. How many days do your engineers calculate Sublimity could survive without moving our waste? And Sublimity "houses" Marian Estates which consists of approximately 150 senior citizens; some of which are immobile. Sewage transportation along with water contamination is an unknown. We as residents NEED a way to flush our toilets!!! The information lacking in the report so far has been provided by Barry Buchanan, Stayton's interim Public Works Director. Can there be more discussion about Marian Estates and the city of Sublimity sewage challenge with your project?	USACE updated Section 3.19.4.1 to identify adverse effects to the City of Sublimity and Stayton wastewater facilities. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Dave White	Independent Citizen	The document attached about the dams was signed by William C. Hannan, Jr. Brigadier General, U.S. Army Commanding. The Judges decision was based on junk science published in a predatory journal. The 2008 and 2024 fake Biological Opinions are cherry picked junk science, That is illegal the Chevron doctrine is null and void since 2005. The fact is we need the power and the fish. The fish ladder at Green Peter has been full of silt since 1989. The Corp has wasted $1.1 million per year for over 36 years. Close to $40 million in waste. Because you still want to do what is illegal I am filing a whistle blower complaint against the CORP today. https://thelawisyourattorney.com/loper-bright-enterprises/ All courts must be article III of the US Constitution. Chevron doctrine is illegal Agencies like FERC and EPA can't cherry pick data for their false agenda. Stare decisis must be vertical to the Constitution, not horizontal. This is because any other case can’t be guaranteed to have enough similarities to warrant use unless the Judge and counsel on both sides have read case transcripts, exhibits and final ruling. No legal or scientific reason to remove any dam. Fish ladders work. The sea lions are the almost 1:1 ratio to the decline of the salmon in the Columbia river. Our salmon protection device attached to the down stream fish ladders will fix declining salmon runs within seven years, salmonprotectiondevice.com Reality is that which when taken away still exists.	Thank you for your comments. They will be taken under consideration.

Dave White	Independent Citizen	$450 million Case 18-cv-00437-HZ ruling was based on incomplete science and Plaintiffs using Federal Department of Justice Attorneys to sue the government. This is 18 USC 11 conflict of interest. Specifically Section 203 87-849 Conflict of Interest Provisions of Public Law. Furthermore, the ruling said to drain the dam to release the massive silt behind it (The silt "ramp" is around 775 feet tall according to an Operator of the dam). The result was dark, colored water running from Linn County faucets. The clean water act specifically prevents creating this condition: the provisions of the Federal Water Pollution Control Act, specifically 33 U.S.C. 1251 a. 1-7. This is also 42 USC CHAPTER 6A, SUBCHAPTER XII: SAFETY OF PUBLIC WATER SYSTEMS. The previous case ruling is a violation of Oregon law ORS 496.705, resulting in damage suits for negligent, but unlawful killing of wildlife. The uninformed action on Green Peter Dam killed thousands of fish. This is a violation of the Endangered Species Act, specifically Section 11. Penalties and Enforcement 1 a. Additionally, there was no Section 404 permit for the drawdown because it was court-ordered. This is a violation of the Clean Water Act as: 33 CFR Parts 320-332) authorizes only the Corps to issue permits for the discharge of dredged or fill material into navigable waters. Jurisdictional waters were later expanded to include "waters of the United States" for Section 404 purposes. There is no legal or scientific reason to remove any dam. Fish ladders work if properly maintained. If a fish ladder on a dam doesn't work check with the operators of the dam to find out, why. The injunction is to vacate the erroneous ruling in 18-cv-00437-HZ, because nobody but Plaintiff had the common sense to check with the operator of the dam. https://www.northwestobserver.com/index.php?ArticleId=3356 Ron Edwards will testify as an expert witness. Ron was an Operator for Green Peter and Foster Reservoir. This is his exhibits https://1drv.ms/b/c/d172f747c79ee46a/Eear1THKqfIlpQdFm1fKqCcBpT4aRf1edoueL9hHxr_3Zw?e=pv65n4 Predatory Journals are a Fabrication. The American Meteorological Society (AMS), Plus One Journal and the Nature Climate Change (NCC) Journals started the predatory journals list website to distract from what the AMS and Plus One and the NCC are doing. These AMS, Plusone and NCC journals charge thousands of dollars to publish manuscripts based on jaundiced science, and then perform prejudiced peer reviews. Their chief editors operate on a "belief" system based on political narratives and not the climate science issues. For example, if a manuscript doesn't match their belief system, then it won't go to peer review. These journals also have a very high publishing rate. They almost always publish everything the chief editor allows to be peer reviewed. Also, their impact factors (the benchmark for journal effectiveness) are typically lower than the so-called predatory journals. Predictably, the predatory journals list maligns many good journals, like the respected	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
		International Journal of Chemical Engineering. These journals generally charge lower rates in the range of $300 to $500 to publish a manuscript. Furthermore, they usually have higher impact factor scores than the AMS, Plus One or NCC journals. The Predatory Journals chief editors, like myself, function with an open-minded, scientific review system. That's what actual scientists do and teach their students to do as well. 2024 illegal deep drawdown violates The clean water act specifically prevents this: the provisions of the Federal Water Pollution Control Act, specifically 33 U.S.C. 1251 a. 1-7. On another note our device to fix the salmon issue on the Columbia river has finish scientific peer review at NOAA fisheries. We can help with lawsuits and injunctions. No legal or scientific reason to remove any dam. Fish ladders work. The sea lions are the almost 1:1 ratio to the decline of the salmon in the Columbia river. Our salmon protection device attached to the downstream fish ladders will fix declining salmon runs within seven years	
Greg Drozdiuk	Santiam Water Control District	I am reaching out to inquire about the availability and development history of revetments and/ or levees along the Santiam River. Specifically, we are trying to determine whether revetments were constructed along portions of the river. We have a suspicion that some revetments may have been built as part of an Environmental Impact Statement (EIS) related to the Detroit Reservoir drawdown. We are also interested in whether any maps have been created that show the locations of these revetments and/or levees, either in GIS format (e.g., shapefiles or geodatabases) or as paper or scanned maps.	Section 3 of Appendix S describes the USACE constructed revetments, including a map of their locations. No revetments are proposed in association with the Detroit deep drawdown.
Steve Elzinga	Marion County	Please see the attached additional Marion County comment letter on the Willamette Valley System Draft Supplemental Environmental Impact Statement. The letter includes a request to extend the public comment period. Thank you for your review and consideration. A copy will also be sent by mail.	USACE extended the end of the comment period from December 29, 2025 to January 13, 2026.
Steve Elzinga	Marion County	The Marion County Board of Commissioners writes to provide comments on the Draft Supplemental Environmental Impact Statement (SEIS) addressing proposed changes to the operations of the Willamette Valley System, including Detroit Dam. Marion County encompasses downstream communities that rely heavily on the North and South Santiam Rivers for drinking water, economic vitality, recreation, and overall public health. As such, we have serious concerns regarding the Preferred Alternative as it relates to Detroit Reservoir operations.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Steve Elzinga	Marion County	Downstream Drinking Water and Turbidity Concerns Foremost among our concerns is the risk of increased turbidity and sediment transport to downstream drinking water systems that rely on the Santiam River system as their primary source of potable water. Communities including Salem, Stayton, Turner, Jefferson, and multiple rural water districts collectively serve more than 200,000 Oregonians using water drawn directly from the Santiam Rivers. These systems are not designed to withstand prolonged or repeated high-sediment events without substantial cost, operational disruption, or risk to public health. The SEIS characterizes anticipated turbidity impacts as "moderate," yet recent experience in the Willamette Basin calls that conclusion into question. The Green Peter and Foster Reservoir drawdown experiment, conducted for similar fish passage objectives, resulted in extreme turbidity levels downstream and tens of millions of dollars in documented damage to municipal drinking water infrastructure. Critically, the SEIS does not adequately incorporate this real-world data into its analysis, nor does it demonstrate how conditions at Detroit would materially differ in a way that meaningfully reduces risk. Without clear, quantitative sediment modeling, turbidity projections, treatment-threshold analysis, and contingency planning, the SEIS does not provide sufficient assurance that downstream drinking water systems can operate reliably under the proposed drawdown regime. The Board is particularly concerned that proceeding without these analyses places local governments and ratepayers at risk of bearing the financial and public health consequences of a federal operational decision.	The SEIS analyzed impacts water supply and turbidity. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit based on model results. The impact is low because the drawdown would occur during the late fall and early winter during the season with the largest amount of precipitation. The drawdown operation would end about one month before the normal refill season would begin, meaning that USACE will have an entire month to regain the 55ft in elevation which can happen as quickly as in a few days. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill. The model results depicted also do not reflect how real-time water management can help to minimize impacts to reservoir elevations. USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur.
Steve Elzinga	Marion County	Scientific Uncertainty and Effectiveness of the Proposed Action The Board is also concerned that the SEIS does not demonstrate, with site-specific scientific evidence, that the proposed deep drawdown at Detroit Dam will achieve its intended biological outcomes. While improving passage for ESA-listed salmonids is an important goal, the SEIS relies heavily on assumptions rather than empirical results. Notably, the Green Peter/Foster drawdown experiment has not yet demonstrated measurable improvements in salmon returns, and adult fish response will not be known for several years. Given this uncertainty, it is premature to expand or replicate a drawdown strategy that has already produced severe and documented downstream impacts elsewhere in the basin. The SEIS does not answer the fundamental question facing affected communities: does this approach actually work, and does the anticipated benefits outweigh the demonstrated risks? Absent clear evidence of effectiveness, Marion County believes it is inappropriate to impose further risk on downstream water users and communities.	Taking action for listed species is not a discretionary experiment but a legal requirement under the Endangered Species Act. The target drawdown pool elevation is 1395 which is 50 feet above the center line of the upper regulating outlets at Detroit Dam. Studies at other reservoirs have confirmed that drawdowns improve downstream passage and survival for juvenile salmon when these fish pass through non-turbine outlets at shallow depths (which this operation facilitates). Some juvenile Chinook salmon would pass downstream through dam outlets at greater the 50 feet of depth, however numbers passing increase when depths are lower. This operation balances providing downstream passage improvements and the ability to refill the reservoir to support other objectives, including recreation and downstream water supply the following year. The WVS EIS and SEIS include the scientific references relied on to assess the effects of the proposed Detroit Reservoir drawdown. Additional information is available online at the following sites: https://public.crohms.org/tmt/documents/FPOM/2010/Willamette_Coordination/, and https://public.crohms.org/tmt/documents/FPOM/2010/Willamette_Coordination/WFSR/ While long-term data on adult returns from this specific action is not yet available, the strategy is based on established fish behavior. Studies show that juvenile salmon have higher survival rates when they pass through non-turbine outlets at shallow depths (which this operation facilitates). The SEIS analyzes impacts to fish survival, water systems, recreation, Kokanee and the broader Santiam economy in Chapter 3 of the SEIS. The FSEIS was updated to include additional information on local water systems and Kokanee.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Steve Elzinga	Marion County	Cumulative Impacts of Federal Actions Communities in the North Santiam Canyon and downstream Marion County have repeatedly absorbed the impacts of federal decisions related to land management, forest policy, dam operations, and emergency response. These cumulative impacts matter. Local governments and residents have consistently been asked to adapt to operational changes over which they have little control, while shouldering long-term economic and infrastructure consequences. This proposed operational change must be evaluated within that broader context. The SEIS, as drafted, does not sufficiently account for the cumulative burden placed on these communities by successive federal actions, particularly when risks are localized while benefits remain uncertain or long-term.	The SEIS evaluates the reasonably foreseeable effects to the human and natural environment, including socioeconomic effects, and USACE will take those effects into consideration when selecting an operating plan for implementation. To continue to operate the WVS, USACE must comply with all applicable laws and Treaties, including the ESA and the authorizing legislation for the projects. The comment does not provide any specific reasonably foreseeable impacts that the SEIS failed to analyze. As it relates to compounding location specific impacts, see updates to SEIS 3.11 Socioeconomics, section 3.11.2.1 that describe the relationship between the socioeconomic impacts and location specific impacts.
Steve Elzinga	Marion County	Ongoing Recovery from the 2020 Wildfires Finally, the Board emphasizes that communities in and around the Santiam Canyon are still actively recovering from the devastating 2020 Labor Day wildfires, which caused catastrophic loss of homes, businesses, infrastructure, and community stability in Detroit, Idanha, Gates, Lyons, and surrounding areas. Recovery has been slow and uneven, and recreation-based economic activity tied to Detroit Lake and the Santiam River system remains a critical pillar of that recovery. Actions that further disrupt reservoir levels, water quality, or recreation access risk undermining this fragile progress, yet the SEIS does not sufficiently analyze or acknowledge how the proposed drawdown could compound ongoing wildfire-related economic and social impacts.	USACE updated Appendix K Recreation, Figure 1-2 through Figure 1-6 to show year-round water levels under different precipitation scenarios. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure is based on model results and does not show how real-time water management can minimize negative effects to reservoir elevations. The drawdown would occur when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill. USACE updated Chapter 3.11 Socioeconomics, section 3.11.2.1 to describe the relationship between the socioeconomic impacts and location specific impacts, noting the impacts of the 2020 Wildfire on the community of Detroit.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Steve Elzinga	Marion County	Marion County's Request The Marion County Board of Commissioners remains committed to protecting Oregon's natural resources and ensuring the long-term health and resilience of our environment. However, we cannot support proceeding with a deep drawdown at Detroit Dam without clearer scientific justification, comprehensive incorporation of lessons learned from the Green Peter/Foster experiment, and robust analysis of downstream drinking water risks and community impacts. We respectfully request that the U.S. Army Corps of Engineers pause further implementation of this proposed operational change until: • The results of prior draw down experiments are fully evaluated and publicly documented; • Site-specific sediment and turbidity modeling is completed for Detroit Reservoir; • Downstream drinking water providers are fully engaged and protected; and • The cumulative and post-wildfire impacts to Santiam Canyon communities are meaningfully addressed. Marion County stands ready to work collaboratively with the Corps to identify solutions that balance fish recovery goals with public health, water reliability, and community resilience.	In Section 3.19, the SEIS analyzes the effects on water drinking from sediment movement and transport cause by the 2023 and 2024 Green Peter drawdowns. The data relating to sediment movement from prior drawdowns have been incorporated into the analysis in Section 3.19 of the SEIS and made available to the commentor via email. However, quantitative analysis is not required under NEPA. The SEIS utilizes a combination of quantitative and qualitative analysis to describe water quality impacts and socioeconomic impact including turbidity, sediment and socioeconomic impacts for the proposed interim operation at Detroit. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. The SEIS Chapter 3.11 Socioeconomics, section 3.11.3.1 Methodology notes the degree of effects resulting from the analysis does not equate to an equal degree of effect when compared to the No Action Alternative. The SEIS notes that the 2020 North Santiam River Subbasin wildfires resulted in substantial adverse effects on opportunities (See Chapter 3.11 Socioeconomics, section 3.11.3.1 Methodology, section 3.6, Vegetation, section 3.6.2.3, 2020 Wildfires). USACE updated SEIS Chapter 3.11 Socioeconomics, section 3.11.2.2 to describe the relationship between the socioeconomic impacts and location specific impacts. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Steve Elzinga	Marion County	On behalf of Marion County, we submit these additional comments regarding the Willamette Valley System Draft SEIS. Careful review and fidelity to federal law is important for protecting all aspects of the environment, especially water quality for Marion County residents. Section 1205(b) of Thomas R. Carper Water Resources Development Act of 2024, required the Army Corps to complete within one year (by January 4, 2026) a "report on instances of high turbidity in a reservoir in the Willamette Valley resulting from a drawdown in the reservoir." The law includes various specific report requirements, including learning from past mistakes in the recent deep drawdowns at nearby Green Peter Lake. In violation of federal law, this report has not yet been completed. This is particularly concerning since the SEIS does not include sufficient evaluation of how turbidity from a deep drawdown at Detroit Lake will harm numerous aspects of the environment, especially by harming water quality for Marion County residents. Under 42 U.S. Code § 4332(C), all environmental impact statements must include "a detailed statement" on "reasonably foreseeable environmental effects of the proposed agency action" among other things. Since increased turbidity has environmental impacts and Congress required a relevant turbidity report, that report will address effects that are "reasonably foreseeable," especially considering lessons from the recent deep drawdowns at nearby Green Peter Lake. The Army Corps must complete and publish the turbidity report required by federal law and then should either (1) allow a reasonable amount of additional time for the public to review and submit comments on the SEIS based on the turbidity report or (2) revise the SEIS based on the turbidity report and then open a new public comment period based on the revised SEIS.	Thank you for your comments. They will be taken under consideration.
Cam Ellis, Jerry Drum	Independent Citizen	Thank you for the opportunity to comment. I also appreciate the informative meetings that have been held and the extension of the public comment period. As a native Oregonian, I am concerned about the Deep Drawdown proposal and the potential impacts it could have on the community—specifically regarding the existing kokanee fishery, tourism, summer recreational activities, and water quality for local municipalities and communities. I have seen firsthand the impacts the Green Peter drawdown has had on many fronts. While I understand that action was mandated by a court order, it is critical that we learn from that experience to prevent unintended consequences and mitigate impacts through scientific, data-driven analysis. Below are my primary concerns:	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Cam Ellis, Jerry Drum	Independent Citizen	1) Impacts to local fisheries a. The kokanee population at Green Peter was devastated by the drawdown. While I understand kokanee are not a native species, they support a highly popular and productive fishery at Detroit Lake. During the spring and summer months, the lake attracts hundreds of anglers enjoying time with friends and family while teaching the next generation how to fish. This fishery not only provides recreational value but also significantly supports tourism and the local economy. A clear plan is needed to preserve this valuable kokanee fishery while balancing efforts to improve endangered salmon survival. To date, I have not heard a quantified estimate of kokanee losses resulting from a deep drawdown—only that there will be "an impact." b. Available data appears limited or incomplete regarding salmon returns in the South Santiam River. A decision of this magnitude should not be made without additional information. As this is only the third year of drawdowns at Green Peter, there has not been sufficient time or evidence to demonstrate meaningful changes in salmon return rates.	USACE expects an impact on the kokanee fishery, but the extent is uncertain. To reduce the impact, the proposed Detroit drawdown is scheduled for late fall/early winter when the fish are more spread out and the summer recreation season has ended. The plan for Detroit has been designed specifically to learn from Green Peter. Key differences include: Timing: The drawdown is scheduled for late fall, when the water is cooler and kokanee are more widely distributed, reducing the risk of a mass casualty event. Scale: The drawdown will be less extreme than what occurred at Green Peter, leaving a larger portion of the reservoir intact. A detailed analysis of recreation impacts can be found in Appendix K of the SEIS. Appendix K of the SEIS analyzes changes in recreational visitation under each alternative compared to the no action alternative and changes in the value of recreational opportunities under each action alternative compared to the no action alternative. The proposed elevation for the deeper drawdown at Detroit is based on field studies showing juvenile Chinook prefer to pass the dam when depths to the outlets are reduced and competing flows through outlets are minimal. At the current lowest pool elevation, 1450 feet, the shallowest outlet for fish is the turbine penstocks, about 45 feet deep, which results in high fish mortality. When water is instead passed through the regulating outlets at 1450 feet, the depth to that outlet is about 100 feet or more, reducing the number of juveniles passing this safer route. A deeper drawdown would reduce the depth over the regulating outlets, allowing more fish to safely pass through that outlet. Although it is too soon to see the results for adult Chinook salmon from the recent drawdowns at Green Peter, juvenile kokanee salmon that passed through the dam during these operations have returned as adult sockeye salmon after foraging in the ocean. The drawdown at Fall Creek has also been proven to be an effective operation for ensuring juvenile salmon survive their downstream migration.
Cam Ellis, Jerry Drum	Independent Citizen	2) Summer recreation a. While it has been stated that a deep drawdown should not impact water levels during peak summer recreation months, I remain unconvinced. I would like to better understand how the Corps plans to manage spring water levels to prevent recreational impacts. As recently as the 2025 season, Detroit Lake did not reach the revised full pool elevation of 1,558.5 feet. Although 2025 was not classified as a dry year, lower-than-normal spring rainfall still resulted in reduced water levels. With an additional drawdown of approximately 50 feet, I am concerned there will be more years when the lake fails to reach full pool. This would further strain the local community through lost tourism, reduced lake access, and potential impacts to downstream agricultural water needs. Additionally, I did not hear any updates regarding the revised full pool elevation of 1,558.5 feet or whether there are plans to return to the previous full pool elevation of 1,562.5 feet. Has the impact of recent wildfires—particularly their effects on snow retention and runoff—been evaluated and accounted for in spring water retention planning?	Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. The drawdown would occur during the late fall and early winter, when the reservoir is at its lowest elevation to accommodate high flows during the flood season. The drawdown operation would end about one month before the normal refill season, leaving a substantial amount of time for the reservoir to fill to the typical minimum conservation elevation. The hydrologic modeling supports the conclusion that the drawdown is not expected to impact refill of the reservoir, except during very dry years, when the ability to refill is more of a reflection of natural hydrology than winter operations. The Interim Risk Reduction Measure that limits the maximum conservation season refill elevation by five feet does not have an end date. Further dam safety studies are required. USACE considers many factors during annual conservation season planning, including information from the NW River Forecast Center. This entity considers many aspects of riverflow, including snowpack and current conditions.

Commenter Name	Commenter Affiliation	Comment	USACE Response
p	Independent Citizen	3) Impacts to local municipalities a. The deep-water drawdown at Green Peter significantly impacted downstream water treatment facilities, resulting in severe turbidity and degraded water quality. More data, time, and funding are necessary to allow downstream municipalities to adequately prepare for similar consequences associated with a deep-water drawdown at Detroit.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams based on the drawdowns at different locations in WVS. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. These drawdowns have been ongoing for varying lengths of time. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats due to the timing, elevation, and duration of the drawdown. USACE assessed elevation of the drawdown, and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify or cease the operation to improve conditions for fish and reduce adverse impacts that may occur.
Cam Ellis, Jerry Drum	Independent Citizen	In closing, I respectfully recommend canceling or delaying the proposed deep-water drawdown until additional data is available to support a truly data-driven path forward, or until alternative, feasible solutions are developed. While the protection and recovery of endangered salmon is critically important, these decisions must be made carefully and with full consideration of their broader impacts to communities, ecosystems, and economies. Thank you for your consideration.	Thank you for your comments. They will be taken under consideration.
Logan Ellis	Independent Citizen	Recent Fisheries and Wildlife degree graduate from OSU and Owner of Chicken Little's Guide Service. I am one of the few forest service permitted fishing guides on Detroit Lake. I am very concerned with the proposed drawdown for Detroit Lake for several reasons. After seeing the tragic events that happened at Green Peter, I do not want the same thing to happen to Detroit.	Thank you for your comments. They will be taken under consideration.
Logan Ellis	Independent Citizen	To start, I am most concerned about the kokanee population in Detroit Lake if this drawdown were to happen. After seeing the entire Green Peter kokanee population get wiped out completely, this absolutely cannot happen to Detroit. I make a living guiding the lake for kokanee between the months of April, May, June and July. Most of the kokanee in Detroit are that of wild stock and only a small percentage are hatchery planted. It would be devastating to the population to wipe the wild strain of kokanee out completely. It has taken so many years to get the kokanee population healthy, stable and that of strong numbers to what it is today. It will also affect me financially and the other guides on the lake as that is how we make our money during the spring and summer.	USACE expects an impact on the kokanee fishery, but the extent is uncertain. To reduce the impact, the proposed Detroit drawdown is scheduled for late fall/early winter when the fish are more spread out and the summer recreation season has ended. The plan for Detroit has been designed specifically to learn from Green Peter. Key differences include: Timing: The drawdown is scheduled for late fall, when the water is cooler and kokanee are more widely distributed, reducing the risk of a mass casualty event. Scale: The drawdown will be less extreme than what occurred at Green Peter, leaving a larger portion of the reservoir intact. A detailed analysis of recreation impacts can be found in Appendix K of the SEIS. Appendix K of the SEIS analyzes changes in recreational visitation under each alternative compared to the no action alternative and changes in the value of recreational opportunities under each action alternative compared to the no action alternative. As it relates to economic impacts, see updates to SEIS 3.11 Socioeconomics, section 3.11.2.1.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Logan Ellis	Independent Citizen	Secondly, when Green Peter was drained, there has not been enough time yet to see if the adult salmon are returning back in stronger numbers yet. We are still a year or 2 away from noticing any difference in returns. So why are you in a rush to test this at Detroit when nothing is proven yet? The drawdown must be put on hold to either confirm or deny that it worked for Green Peter to move onto Detroit Lake drawdown.	The proposed elevation for the deeper drawdown at Detroit is based on field studies showing juvenile Chinook prefer to pass the dam when depths to the outlets are reduced and competing flows through outlets are minimal. At the current lowest pool elevation, 1450 feet, the shallowest outlet for fish is the turbine penstocks, about 45 feet deep, which results in high fish mortality. When water is instead passed through the regulating outlets at 1450 feet, the depth to that outlet is about 100 feet or more, reducing the number of juveniles passing this safer route. A deeper drawdown would reduce the depth over the regulating outlets, allowing more fish to safely pass through that outlet. Although it is too soon to see the results for adult Chinook salmon from the recent drawdowns at Green Peter, juvenile kokanee salmon that passed through the dam during these operations have returned as adult sockeye salmon after foraging in the ocean. The drawdown at Fall Creek has also been proven to be an effective operation for ensuring juvenile salmon survive their downstream migration.
Logan Ellis	Independent Citizen	Next is the water quality issue below the dams. We all saw what happened to Lebanon and Sweet Home water quality with the massive amounts of turbidity flowing down the river. It was absolutely terrible and caused so many problems and cost a lot of money to fix it. What if this were to happen to Stayton and Salem water quality? It would affect a lot more people than what happened in South Santiam. This leads into the next problem. There many native fish strains present in the North Santiam during the proposed drawdown. Wild winter steelhead, wild rainbow trout, wild coho salmon and wild chinook salmon. Some of these are ESA listed and protected species, and also are actively spawning in the river when the drawdown is proposed for. You need to take into consideration you may be killing more adult fish in the river while trying to save the salmon smolts coming down out of the lake. More needs to be researched on this before it happens because if you are only saving a few smolts coming out of the lake, yet killing adults already in the river from the high turbidity flows, that makes no sense at all. In the end, I urge you to either cancel or delay the drawdown until there is more scientific evidence from Green Peter's findings and how it will impact Detroit. Thank you	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams based on the drawdowns at different locations in WVS. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. These drawdowns have been ongoing for varying lengths of time. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats due to the timing, elevation, and duration of the drawdown. USACE assessed elevation of the drawdown, and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify or cease the operation to improve conditions for fish and reduce adverse impacts that may occur.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Denny Nielsen	City of Detroit	On behalf of the Detroit City Council and the Detroit Lake Foundation, we appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) concerning the continued operations and maintenance of the Willamette Valley System (WVS). As both a city councilor and a board member of the Detroit Lake Foundation, I remain deeply concerned about several critical issues. Foremost is the potential contamination of downstream water supplies due to increased turbidity and extreme drawdowns. I am unconvinced that a deep drawdown will yield different outcomes than those observed in other valley reservoirs starting in 2023, which severely impacted community filtration systems downstream. Additionally, I am highly concerned about the broader economic consequences for our city, the businesses within Detroit, and the potential disruption to recreation at Oregon's busiest lake and reservoir system. Finally, since the U.S. Army Corps of Engineers began managing Detroit Reservoir in the 1950s, there has been a lack of credible, peer-reviewed scientific research guiding reservoir management decisions. Furthermore, as will be discussed later, there are numerous unresolved issues, including the pending update to the Water Resources Development Act (WRDA), which has yet to be initiated or completed.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams based on the drawdowns at different locations in WVS. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. These drawdowns have been ongoing for varying lengths of time. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats due to the timing, elevation, and duration of the drawdown. USACE assessed elevation of the drawdown, and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. As it relates to economic impacts, see updates to SEIS 3.11 Socioeconomics, section 3.11.2.1 that describe the relationship between the socioeconomic impacts and location specific impacts. It is unclear which WRDA provision or specific Act is being referenced in the comment.
Denny Nielsen	City of Detroit	We write to express strong opposition to the proposed alternatives, including the Preferred Alternative (Alternative 5), and in particular the inclusion of the late fall/early winter deep drawdown of Detroit Reservoir to elevation 1395 feet, which will have serious adverse consequences for drinking water systems, recreation, the Kokanee fishery, and the broader Santiam Canyon economy. The SEIS fails to adequately characterize these effects and does not demonstrate that the Preferred Alternative will meaningfully benefit ESA-listed fish populations. Our concerns are outlined below.	Chapter 3 of the SEIS further analyzes the impacts to public water systems in updates to Section 3.19. Recreation impacts can be found in Section 3.14. Impacts to resident fish can be found in Section 3.8. Finally, impacts to the economy of Detroit can be found in updates to Section 3.11.
Tracie Evenson	Independent Citizen	On behalf of the Detroit Lake Foundation, we appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for continued operations and maintenance of the Willamette Valley System (WVS). Our organization represents residents, recreational users, and community stakeholders who rely on Detroit Lake, the North Santiam River, and the surrounding watershed for drinking water, recreation, ecological health, and economic stability. We write to express strong opposition to the Preferred Alternative (Alternative 5), and in particular the inclusion of the late fall/early winter deep drawdown of Detroit Reservoir to elevation 1395 feet, which will have serious adverse consequences for drinking water systems, recreation, the Kokanee fishery, and the broader Santiam Canyon economy. The SEIS fails to adequately characterize these effects and does not demonstrate that the Preferred Alternative will meaningfully benefit ESA-listed fish populations. Our concerns are outlined below.	Chapter 3 of the SEIS further analyzes the impacts to public water systems in updates to Section 3.19. Recreation impacts can be found in Section 3.14. Impacts to resident fish can be found in Section 3.8. Finally, impacts to the economy of Detroit can be found in updates to Section 3.11. The proposed elevation for the deeper drawdown at Detroit is based on field studies showing juvenile Chinook prefer to pass the dam when depths to the outlets are reduced and competing flows through outlets are minimal. At the current lowest pool elevation, 1450 feet, the shallowest outlet for fish is the turbine penstocks, about 45 feet deep, which results in high fish mortality. When water is instead passed through the regulating outlets at 1450 feet, the depth to that outlet is about 100 feet or more, reducing the number of juveniles passing this safer route. A deeper drawdown would reduce the depth over the regulating outlets, allowing more fish to safely pass through that outlet. Although it is too soon to see the results for adult Chinook salmon from the recent drawdowns at Green Peter, juvenile kokanee salmon that passed through the dam during these operations have returned as adult sockeye salmon after foraging in the ocean. The drawdown at Fall Creek has also been proven to be an effective operation for ensuring juvenile salmon survive their downstream migration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Tracie Evenson	Independent Citizen	As a resident of Detroit, I am extremely concerned this drawdown is going to have detrimental effects on recreation, tourism and economic instability. Our town suffered a devastating wildfire in 2020, and we are still struggling to rebuild and recover. One of the biggest obstacles we face is always the uncertainty of the lake level. Business are reluctant to rebuild without a guarantee of customers. We've had summers where the lake didn't fill and summers where the boating and camping season was much shorter. When these things occur, our tourism dies. Detroit is the most popular lake in Oregon for fishing and water sports.	The SEIS incorporates the following from the FEIS by reference, noting that the 2020 North Santiam River Subbasin wildfires resulted in substantial adverse effects on opportunities (See Chapter 3.11 Socioeconomics, section 3.11.3.1 Methodology, section 3.6, Vegetation, section 3.6.2.3, 2020 Wildfires). USACE updated SEIS Chapter 3.11 Socioeconomics, section 3.11.2.2 to describe the relationship between the socioeconomic impacts and location specific impacts.
Tracie Evenson	Independent Citizen	With Global warming we are seeing less rain and snow each year. And the shade canopy around Detroit has been destroyed from the wildfires so the snow melt occurs rapidly. Using the current rule curve that snow melt is not being captured. I would love to see adjustments made to the curve to accommodate for this. With all of these things happening it's hard to get the lake to full pool and to keep it recreational levels during the late summer months. Summer months are critical as we see wildfires on the rise having a full lake gives ample Firefighting protection resources. Empty reservoirs in California last year led to even more devastating wildfire damages.	Updating the rule curve is beyond the scope of the SEIS. Studying changes to the rule curve would impact USACE's flood control mission due to posing an unacceptable risk to life safety, thus were screened out from consideration as part of this effort. The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. Even during the drawdown, a large pool would remain.
Tracie Evenson	Independent Citizen	The North Santiam river also provides the drinking water to the cities below the canyon there are serious concerns about water turbidity and storage. Oregon has been in a drought for over 100 years, and these conditions just seem to be worsening. It would make more sense to store as much water as possible. Water is becoming a scares commodity, and we should be figuring out all possible means of storing it. This year we are already seeing a warmer and dryer fall/winter with very little snow in the mountains. Unless we have a very wet spring we are going to be in severe drought like conditions.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure shows model results and does not show how real-time water management can minimize negative effects to reservoir elevations. The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Tracie Evenson	Independent Citizen	I would also like to see Scientific data supporting these drawdowns. Are we actually seeing a rise in Salmon populations? I do not want Detroit to turn into another Green Peter Reservoirs Disaster! We have a large Kokanee population that draws in a large number of anglers each year and I would hate to see the Kokanee whipped out.	The proposed elevation for the deeper drawdown at Detroit is based on field studies showing juvenile Chinook prefer to pass the dam when depths to the outlets are reduced and competing flows through outlets are minimal. At the current lowest pool elevation, 1450 feet, the shallowest outlet for fish is the turbine penstocks, about 45 feet deep, which results in high fish mortality. When water is instead passed through the regulating outlets at 1450 feet, the depth to that outlet is about 100 feet or more, reducing the number of juveniles passing this safer route. A deeper drawdown would reduce the depth over the regulating outlets, allowing more fish to safely pass through that outlet. Although it is too soon to see the results for adult Chinook salmon from the recent drawdowns at Green Peter, juvenile kokanee salmon that passed through the dam during these operations have returned as adult sockeye salmon after foraging in the ocean. The drawdown at Fall Creek has also been proven to be an effective operation for ensuring juvenile salmon survive their downstream migration.
Tracie Evenson	Independent Citizen	I would also like to see the Turbidity testing completed before this is implemented safe drinking water for the communities downstream should be first and foremost!	USACE tested the Detroit Reservoir sediment several times, most recently in 2013 and 2018 and would sample the reservoir again in April 2026 to analyze the sediment for heavy metals and contaminants, as well as grain size prior to initiating the deeper drawdown.
Scott Amerman	Independent Citizen	I'm writing to say please don't experiment with our fish, our fisheries and our economy. It's insane that the army corp is considering a Detroit drawdown without researching the impacts on not just our fisheries and our wild fish population but on what impact it would have on local drinking water. Please don't experiment, do the research or don't do the drawdown 1) Impacts to local fisheries. What is the impacts doing a drawdown would have on our local fisheries and our local economy. Not just the fisheries at the lake but all the fisheries down stream of Detroit. What's the impact on all the fisheries and business that make a living on the fisheries. I will tell you that a drawdown will have a massive negative impact on all of these and if the army corp hasn't done a financial impact study of what this will do to our economic systems PLEASE DON'T DRAWDOWN.	The SEIS analyzed impacts to resident and migratory fish above and below Detroit Dam in Section 3.8 and socioeconomic impacts in Section 3.11.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Amerman	Independent Citizen	2) Summer recreation Detroit has a massive summer recreation season. Where people use the lake for camping, boating and lots of non fishing recreation. If the army corp hasn't done a financial impact study on the economic impact of removing this recreational activities DON'T DRAWDOWN.	A detailed analysis of recreation impacts is in Appendix K of the SEIS. The values of recreational opportunities at USACE projects are calculated using enterprise-wide recreational Unit Day Values (UDVs). Analyses in Appendix K used fiscal year 2025 UDVs, these values are the same across all USACE projects – including Detroit Reservoir. UDVs are assigned based on a system that scores recreational opportunity. Scores are calculated between 0-100. Appendix K of the SEIS analyzes changes in visitation and changes in the value of recreational opportunities under each action alternative compared to the no action alternative. Data on visitations to each project from the USACE Visitor Estimation and Reporting System database and are supplemented with non-USACE campground visitation data. Available data are not specific enough to analyze individual recreational activities at each reservoir year-round, so the analysis assumes that boat ramp access is the sole factor influencing changes in recreational usage of each project. Each of the Action Alternatives 1-6, the No Action Alternative, and the Interim Operations plan are fully analyzed in Appendix K.
Scott Amerman	Independent Citizen	3) I know city of Salem has sent out warnings to its users about possible negative impacts of sediments clogging their water pipes. But what about the heavy metals and other contamination getting into the drinking water. If you have done environmentally impact studies on what it will do to downstream drinking water and water systems PLEASE DON'T DRAWDOWN.	USACE tested the Detroit Reservoir sediment several times, most recently in 2013 and 2018 and would sample the reservoir again in April 2026 to analyze the sediment for heavy metals and contaminants, as well as grain size prior to initiating the deeper drawdown.
Scott Amerman	Independent Citizen	4) We have worked for years to rebuild wild winter steelhead populations on the north Santiam and mainstem on the Santiam. What damage will a drawdown do to silting in their spawn beds. Choking the life out of their offspring? What damage will you do to this threatened wild population by doing a drawdown? If you haven't done an environmental impact study and know the exact answer to this question. PLEASE DON'T DRAWDOWN.	The SEIS analyzes impacts to resident and migrating fish in Section 3.8 of the SEIS. While designed to improve salmon and steelhead juvenile passage, the drawdowns would impact downstream aquatic habitat and aquatic life. The proposed Detroit reservoir drawdown would stir up fine sediment that has settled on the reservoir floor. High concentrations of suspended particles can irritate and clog fish gills, causing stress and making it difficult for them to breathe and find food. Fine sediment can cover redds reducing oxygen levels to eggs. To manage these types of risk, the proposal includes two key protections: 1) Phased Drawdown: The reservoir will be lowered cautiously in stages, not all at once. 2) Continuous Monitoring: Turbidity levels will be constantly measured at the dam's outlets. If the water becomes too muddy, the operation will be paused or stopped to allow the sediment to settle. This careful, monitored approach is designed to keep turbidity within levels down to protect the health of the fish that remain in the reservoir, as well as downstream. Other deeper drawdowns at WVS reservoirs have shown turbidity levels reduce significantly after the initial year, and the timing and duration of the drawdown can also influence turbidity along with seasonal weather patterns.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Amerman	Independent Citizen	5) We are being told you want to do a drawdown to save some wild spring chinook smolts. But what about all the spring chinook that spawn in the North santiam and mainstem what impact will the drawdown have on those fish, their spawning beds and their offspring. I will tell you, you and killing thousands of fish to save a small handful. If you haven't done an environmental impact study and know the exact answer to this question. PLEASE DON'T DRAWDOWN.	While designed for salmon and steelhead, the drawdowns would impact downstream aquatic habitat and aquatic life. The proposed Detroit reservoir drawdown would stir up fine sediment that has settled on the reservoir floor. High concentrations of suspended particles can irritate and clog fish gills, causing stress and making it difficult for them to breathe and find food. Fine sediment can cover redds reducing oxygen levels to eggs. However empirical estimates of settlement and siltation resulting from Green Peter Reservoir deep drawdowns are not available, and we assume that there is not significant amounts settling out as most of the fine material moving downstream is expected to stay in suspension as "wash load." To manage these types of risk for a Detroit deep drawdown, the proposal includes two key protections: 1) Phased Drawdown: The reservoir will be lowered cautiously in stages, not all at once. 2) Continuous Monitoring: Turbidity levels will be constantly measured at the dam's outlets. If the water becomes too muddy, the operation will be modified, paused or stopped to allow the sediment to settle. This careful, monitored approach is designed to keep turbidity within levels down to protect the health of the fish that remain in the reservoir, as well as downstream. ODEQ and other regulatory agencies are cooperating agencies and providing USACE comments and recommendations on the WVS EIS and SEIS. Other deeper drawdowns at WVS reservoirs have show turbidity levels reduce significantly after the initial year, and the timing and duration of the drawdown can also influence turbidity along with seasonal weather patterns.
Scott Amerman	Independent Citizen	6) The North Santiam and mainstem have one of the best wild trout populations in the state of Oregon. Running all of this sediment down through the water they live, feed and bread in will be devastating. Filling in their spawning beds. How many of these fish will the drawdown kill. If you haven't done an environmental impact study and know the exact answer to this question. PLEASE DON'T DRAWDOWN.	While designed for salmon and steelhead, the drawdowns will impact downstream aquatic habitat and aquatic life. The proposed Detroit reservoir drawdown would stir up fine sediment that has settled on the reservoir floor. High concentrations of suspended particles can irritate and clog fish gills, causing stress and making it difficult for them to breathe and find food. Fine sediment can cover redds reducing oxygen levels to eggs. However empirical estimates of settlement and siltation resulting from Green Peter Reservoir deep drawdowns are not available, and we assume that there is not significant amounts settling out as most of the fine material moving downstream is expected to stay in suspension as "wash load." To manage these types of risk for a Detroit deep drawdown, the proposal includes two key protections: 1) Phased Drawdown: The reservoir will be lowered cautiously in stages, not all at once. 2) Continuous Monitoring: Turbidity levels will be constantly measured at the dam's outlets. If the water becomes too muddy, the operation will be modified, paused or stopped to allow the sediment to settle. This careful, monitored approach is designed to keep turbidity within levels down to protect the health of the fish that remain in the reservoir, as well as downstream. ODEQ and other regulatory agencies are cooperating agencies and providing USACE comments and recommendations on the WVS EIS and SEIS. Other deeper drawdowns at WVS reservoirs have show turbidity levels reduce significantly after the initial year, and the timing and duration of the drawdown can also influence turbidity along with seasonal weather patterns.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Amerman	Independent Citizen	7) All of the above wild fish populations rely on a healthy aquatic insect life that the Santiam systems has a healthy and unique population. This is a delicate ecosystem that supports all of the fish populations in addition to its own health. The biggest danger to this ecosystem is water quality and sedimentation. If you haven't done an environmental impact study as to how the drawdown will impact this ecosystem. PLEASE DON'T DRAWDOWN.	Effects from fine sediment are described in Section 3.11 of the SEIS. While designed for salmon and steelhead, the drawdowns will impact downstream aquatic habitat and aquatic life. The proposed Detroit reservoir drawdown would stir up fine sediment that has settled on the reservoir floor. High concentrations of suspended particles can stress and making it difficult for aquatic invertebrates to breathe and impacts their habitat. However empirical estimates of settlement and siltation resulting from Green Peter Reservoir deep drawdowns are not available, and we assume that there is not significant amounts settling out as most of the fine material moving downstream is expected to stay in suspension as "wash load." To manage these types of risk for a Detroit deep drawdown, the proposal includes two key mitigating features: 1) Phased Drawdown: The reservoir will be lowered cautiously in stages, not all at once. 2) Continuous Monitoring: Turbidity levels will be constantly measured at the dam's outlets. If the water becomes too muddy, the operation will be modified, paused or stopped to allow the sediment to settle. This careful, monitored approach is designed to keep turbidity within levels down to protect the health of the fish that remain in the reservoir, as well as downstream. ODEQ and other regulatory agencies are cooperating agencies and providing USACE comments and recommendations on the WVS EIS and SEIS. Other deeper drawdowns at WVS reservoirs have show turbidity levels reduce significantly after the initial year, and the timing and duration of the drawdown can also influence turbidity along with seasonal weather patterns.
Scott Amerman	Independent Citizen	8) In 2023 we had 65k wild coho return to the Willamette River above Oregon city falls. Largest return on record. That year the Army corp did a drawdown on green peter making the entire south santiam, mainstem and the willamette below the mainstem unfishable. Meaning we had record returns but couldn't fish on them. I asked above what damage did the drawdown have on their offspring and their spawning beds. But how were license sales impacted by this drawdown. How many less dollars did odfw have and how was that agency damaged by your decision?	Revenue collected by Oregon state agencies is outside of the scope of the EIS. To understand the methodology use to analyze recreation see Section 3.14 and Section 3.11 for socioeconomic impacts.
Scott Amerman	Independent Citizen	If you haven't studied the economic impact of that and haven't studied the environment impact and damage done to these fish. Please don't experiment and just see what happens. I've asked a ton of people question about what will happen to each of these populations and what is the economic and ecological impacts. And no one can answer any of these questions adequately let alone answer all of them. So if you don't have answers and haven't done the studies you are just experimenting on our ecosystems and economies. Please don't experiment and don't do the drawdown.	The SEIS analyzed impacts to resident and migratory fish above and below Detroit Dam in Section 3.8 and socioeconomic impacts in Section 3.11.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Dawn Plotts	Independent Citizen	I realize you don't want to hear we don't want this but if you truly believe that you want community involvement you need to acknowledge this is not a great idea for Detroit Dam and the North Santiam River. It seems you have had enough problems trying to do this in the Sweet Home/Lebanon area with catastrophic problems. Why would you even try this knowing you're affecting even more people? Are you footing the bill for all the problems cities downstream will have with their water? You are forcing something on them that they did not ask for.	Thank you for your comments. They will be taken under consideration.
Dawn Plotts	Independent Citizen	I do not understand why you cannot use the fish hatcheries for helping this salmon population. Isn't that one of the reasons they exist? Also why is this one species more important than others? Weren't a lot of kokanee wiped out in the Sweet Home/Lebanon project?	Hatcheries were established to mitigate for the lost access of habitat for fish, specifically salmon, steelhead and trout due to the dams and reservoirs, before the Endangered Species Act (ESA) passed. Hatcheries are now partially used to provide for ESA listed species conservation. Spring Chinook hatcheries support the reintroduction of this species above WVS dams which when combined with the proposed methods for passage should increase the number of Spring Chinook in the subbasin and meet ESA requirements. The continued operation and maintenance of hatchery facilities is part of each alternative activity in the SEIS. Increasing hatchery production was not carried forward for detailed analysis based on input from cooperating agencies, instead operational and structural modifications to pass fish were proposed. For a list of measures considered see Appendix A.
Dawn Plotts	Independent Citizen	Now an even more important question - why is one species of fish more important than people - especially when there are other ways to help them. If this happens it will more than devastate the economy of Detroit and on down the river. These poor people in Detroit have been through enough economic problems in the last few years - drought, fires, etc. Which leads to my next question - isn't it dangerous to lower the waters during the most hazardous time for fires? I know humans need to look out and respect nature but this is going overboard. Environmentalists in Oregon need to step back and look at things from other people's perspective. There's got to be a better way.	The Detroit drawdown is included in the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. The Biological Opinion requires the deeper drawdown of Detroit Reservoir until a different fish passage solution is in place. The drawdown would occur during the late fall and early winter.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Donald Mann	Mayor, City of Gates	The City of Gates is writing to formally address significant concerns regarding the proposed deep drawdown of Detroit Reservoir. As a municipal government responsible for ensuring the safety and reliability of our community's water supply, we respectfully request that the United States Army Corps of Engineers carefully consider the potential consequences of this action on our residents and critical infrastructure. Background The City of Gates relies exclusively on the North Santiam River as the source for its municipal water system. Our water treatment plant employs a membrane filtration system, which provides safe, potable water to our residents and businesses. The quality and consistency of the river's water are essential to the operation of this system and, consequently, to the well-being of our community.	Thank you for your comments. They will be taken under consideration.
Donald Mann	Mayor, City of Gates	Concerns: Turbidity Risks and Filtration Limitations We are particularly concerned that a deep drawdown of Detroit Reservoir will result in elevated turbidity levels in the North Santiam River. Based on operational experience and system specifications, our membrane filtration system cannot effectively filter water when turbidity exceeds 30 Nephelometric Turbidity Units (NTU). If turbidity remains above this threshold for an extended period, the filtration system will be rendered inoperable, forcing a shutdown of the water plant. Potential Impacts: Water Supply Vulnerability The City of Gates maintains only a three-day reserve supply of treated water. In the event of a plant shutdown due to high turbidity, we would be compelled to haul water by truck to meet the basic needs of our residents. This contingency is neither logistically feasible nor financially sustainable given our limited resources and the rural nature of our community. Prolonged disruption of our water supply would pose a serious risk to public health and safety and would place an undue burden on both the city and its residents	USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS.
Donald Mann	Mayor, City of Gates	Request for Consideration and Mitigation Considering these concerns, we respectfully urge the United States Army Corps of Engineers to carefully consider the adverse effects that a deep drawdown of Detroit Reservoir may have on the City of Gates. We request that the Corps explore mitigation measures to minimize water quality impacts or provide support and resources to help our community manage the risks associated with elevated turbidity and potential water plant shutdowns. The City of Gates appreciates the opportunity to present our concerns and respectfully requests ongoing engagement as decisions regarding the Detroit Reservoir drawdown are made. Safeguarding our community's water supply must remain a shared priority.	Mitigating impacts to recreation are not a statutory requirement of NEPA. USACE shaped the Detroit drawdown operation to minimize impacts to water quality, drinking water facilities, and recreation including sport fisheries to mitigate some of the adverse impacts.

Commenter Name	Commenter Affiliation	Comment	USACE Response
James Adkins	Association of Northwest Steelheaders	On behalf of the Association of Northwest Steelheaders (ANWS), thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Willamette Valley System. Since 1960, The Association of Northwest Steelheaders has represented anglers, conservationists, and community members who are deeply invested in the recovery of wild salmon and steelhead and the preservation of Oregon's recreational fishing heritage. We urge the Corps to prioritize actions that ensure safe passage for Endangered Species Act–listed fish, maintain existing recreational fishing opportunities, and minimize impacts to downstream water quality, fish habitat and flood protection.	Thank you for your comments. They will be taken under consideration.
James Adkins	Association of Northwest Steelheaders	Prioritize Safe Passage for ESA-Listed Fish ANWS strongly supports operational changes that meaningfully improve survival for juvenile salmon and steelhead migrating downstream. We support the implementation of an annual fall deep drawdown at Detroit Reservoir as required by the National Marine Fisheries Service Biological Opinion. Deep drawdowns are among the most effective and cost-efficient tools available to improve fish passage without compromising the primary flood-control purpose of the dams. The USACE proposed phased, multi-year approach to deepening the drawdown reflects a responsible effort to reduce sediment and water-quality impacts downstream while still providing critical migration benefits for ESA-listed species. We encourage the Corps to commit to this measure as a consistent annual operation and to continue refining it based on data to support fish survivability passing the dams and Willamette project area. The water released from the dams should coincide with timing of the downstream migrating smolts and protect the upstream migrating salmon from temperature shock before they reach the dams. The timing of releases should also be coupled with limiting irrigation draws until after June, based on NMFS and scientific papers published by Oregon State.	Thank you for your comments. They will be taken under consideration.
James Adkins	Association of Northwest Steelheaders	With the water released the fish must have a way to safely pass the dams. As we saw with the Green Peter drawdowns over 99% of the fish passing the dam died. The Draft SEIS does not fully examine the range of options that become available if commercial hydropower is removed from Willamette Valley dams. Since Congress has required the Corps to analyze a "no hydropower" alternative, the final SEIS should explore more than one narrow version. On both the Clackamas River and Deschutes River PGE has retrofitted the dams with new fish passage on the old dams. It's time the Army Corps updated its dams to current standards and not apply a one size fits all solution.	The SEIS analyzes nine very detailed and complex alternatives. When Congress passed the provision in WRDA 24 that required USACE to formally analyze "an alternative that ceases hydropower operations at the [WVS] projects" USACE decided to supplement the existing 8 alternatives with a ninth alternative that would achieve ESA objectives and allow for safe operation of the dams.

Commenter Name	Commenter Affiliation	Comment	USACE Response
James Adkins	Association of Northwest Steelheaders	Limiting hydropower and irrigation during times of flushing fish downstream through new pathways could provide a balanced approach, when considered with the basin size, storage and power generation.	Hydropower generation is limited during the drawdown operations under all the alternatives to prevent fish strikes. See Chapter 2 for all description of the drawdown measures.
James Adkins	Association of Northwest Steelheaders	Preserve Existing Recreational Fishing Opportunities Recreational fisheries are a cornerstone of Oregon's outdoor economy and cultural identity. Decisions made in the Final SEIS will directly affect angling opportunities at Detroit reservoir and beyond. ANWS urges the Corps to preserve existing fisheries that have been established through major public taxpayer dollar investments such as the planted kokanee and trout populations.	USACE expects an impact on the kokanee fishery, but the extent is uncertain. To reduce the impact, the proposed Detroit drawdown is scheduled for late fall/early winter when the fish are more spread out and the summer recreation season has ended. The plan for Detroit has been designed specifically to learn from Green Peter. Key differences include: Timing: The drawdown is scheduled for late fall, when the water is cooler and kokanee are more widely distributed, reducing the risk of a mass casualty event. Scale: The drawdown will be less extreme than what occurred at Green Peter, leaving a larger portion of the reservoir intact. A detailed analysis of recreation impacts can be found in Appendix K of the SEIS. Appendix K of the SEIS analyzes changes in recreational visitation under each alternative compared to the no action alternative and changes in the value of recreational opportunities under each action alternative compared to the no action alternative. Impacts to the local economy have be updated in Section 3.19.
James Adkins	Association of Northwest Steelheaders	Minimize Impacts Downstream We also emphasize the importance of protecting downstream communities that depend on the Santiam River for clean drinking water, as well as dam operations for public safety/flood risk management. Operational changes, including deep drawdowns, must continue to be implemented in a manner that safeguards water quality, manages sediment responsibly, and maintains flood-control reliability.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from newly exposed reservoir beds. The Green Peter drawdown exposed a lot of sediment from highly erodible mudflats. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams.
James Adkins	Association of Northwest Steelheaders	System Wide Habitat Improvements Drawdown coupled with river restoration projects to provide habitat for downstream migrating smolts is necessary. The dams prevent woody debris, gravels and natural river meandering which allows the few smolts that do pass the dams to survive before reaching the ocean. In addition to many ESA-listed anadromous species also rely on downstream portions of the Santiam and Willamette River for habitat for spawning, rearing and general protection from predators. A transparent, science-based approach that balances fish recovery with downstream community needs is essential to maintaining public trust and achieving durable solutions. The USACE has funded these types of projects on a limited basis before. We suggest increased subsidies for riverbank owners, and robust funding for these relatively cheap projects until concrete and steel changes can be made for fish passage around the dams. This measure will also help to remove sediment, and downstream erosion.	The SEIS analyzes the continuation of habitat development but acknowledges that separate site specific NEPA would be required for the various projects. The SEIS also includes measures for augmenting gravel downstream, and replacement of large woody debris see Section 2.8 and Appendix A for a description of the measures evaluated as part of the alternatives.

Commenter Name	Commenter Affiliation	Comment	USACE Response
James Adkins	Association of Northwest Steelheaders	Hydropower Decommissioning Finally, Congress directed the USACE to evaluate a broad range of options, and we urge a dam-by-dam analysis that explores additional operational scenarios, including alternatives that cease commercial hydropower generation while avoiding unnecessary infrastructure removal. Expanding the scope of analysis will provide decision-makers, Tribal governments, and the public with the information necessary to identify solutions that best meet ESA obligations, reduce taxpayer costs, and achieve meaningful fish recovery.	WRDA 24 requires USACE to formally analyze “an alternative” that ceases hydropower operations at the WVS projects. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. The SEIS assessed the measures for ceasing federal hydropower operations at each dam (SEIS Chapter 2.8.5; SEIS Table 23). The Final EIS analyzed Measure 304: Augment Instream Flows by Using the Power Pool dam by dam across all seven action alternatives.
James Adkins	Association of Northwest Steelheaders	Conclusion The Association of Northwest Steelheaders respectfully urges the USACE to produce a Final SEIS that prioritizes safe passage for ESA-listed salmon and steelhead, preserves existing recreational fishing opportunities, and enhances downstream habitat, water quality and public safety. With thoughtful operational changes, downstream restoration, and state of the art fish passage structures the Willamette Valley System better fulfill its flood-control mission while supporting healthy rivers, resilient communities, and thriving fisheries. Thank you for considering our comments and for your continued engagement on this critical issue.	Thank you for your comments. They will be taken under consideration.
Jennifer Fairbrother	Native Fish Society	Native Fish Society submits these comments in response to the comment period for the Willamette Valley System (WVS) draft Supplemental Environmental Impact Statement (SEIS). These comments are in addition to our comments submitted in February 2023 on the draft Environmental Impact Statement (DEIS). As an organization 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 National Environmental Policy Act (NEPA) process presents a critical opportunity to evaluate operational and structural modifications that prioritize fish recovery consistent with the Endangered Species Act (ESA), Congressional directives, 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.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jennifer Fairbrother	Native Fish Society	1. Inadequate Process and Insufficient Alternatives: A Request for Meaningful Engagement The SEIS was developed under an unreasonably compressed timeline that has compromised meaningful public participation and coordination with tribal and inter-agency partners. By presenting the structure of "Alternative 6" before the public scoping period even began, the Corps signaled that the alternative was effectively predetermined and that stakeholder input would receive minimal consideration. Consequently, the resulting alternative is insufficient, narrowly tailored, and fails to meet the Congressional intent behind the Water Resources Development Acts (WRDA) of 2020, 2022, and 2024. These statutory directives were intended to ensure a comprehensive analysis of all reasonable operational and infrastructural measures to recover threatened fish populations—not just a single, flawed option. Instead of collaborating in good faith, the Corps has presented a regulatory "straw man" designed to fail. Alternative 6 creates a false dilemma, forcing decision-makers and the public to choose between the draft EIS' preferred alternative or a structurally detrimental, $3+ billion alternative that the SEIS admits will cause high mortality for fish and fail to meet water quality needs. This approach withholds the critical information necessary for informed decision-making and deprives federal and state agencies, tribes, Congress, and the public of an honest discussion about the full suite of options available if commercial hydropower is eliminated. While immediate action to stem the decline of listed species is vital, the recently published 2024 Biological Opinion and interim Record of Decision already provide the necessary framework for near-term measures. This allows the Corps the necessary time to get this long-term analysis done correctly. We therefore request that the Corps immediately convene stakeholders, cooperating agencies, and Tribal Nations to co-design additional, truly comprehensive alternatives. This analysis must assess the full spectrum of technical possibilities, including options that eliminate commercial hydropower without requiring the complete removal of infrastructure, or that eliminate it at some dams but not others. We urge the Corps to engage in this work collaboratively to foster a shared understanding and build reasonable confidence in the path forward for our fish, rivers, and communities.	The NEPA process for the operation and maintenance of the WVS began in April 2019, approximately seven years ago and six years before the NOI for the supplemental EIS was published. The public scoping comments were accepted from April 1- June 28, 2019, for a total of 89 days and five scoping meetings were held. Based on the public's input and in coordination with cooperating agencies, USACE developed 8 alternatives. The public comment period on the draft EIS lasted 90 days and the Corps held six meetings. Prior to finalizing the EIS the President signed WRDA 2024 into law. USACE executed a ROD complying with NEPA for most of the operations described in NMFS 2024 BiOp. It then announced it would supplement the previous eight alternatives with a ninth alternative and a deeper draw down at Detroit Dam in the fall that was not previously analyzed. The scoping occurred from May 16, 2025 until June 21, 2025. Two scoping meetings were held on May 28 and June 3, 2025. Scoping comments informed the scope of Alternative 6, in addition, to information USACE had prepared over the years for WRDA provisions not related to the NEPA process. USACE relied on the plain language of Section 1326 of WRDA 2024, scoping comments, and information USACE had prepared over the years for WRDA provisions not related to the NEPA process to inform Alternative 6. In WRDA 24, Congress directed USACE to analyze "an" alternative that "ceases hydropower operations" at the projects. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. The plain meaning of the Act did not require USACE to analyze numerous additional alternatives when it has already developed a reasonable range as part of the original EIS. A more detailed description of the development alternative 6 please see Appendix A.

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Jennifer Fairbrother	Native Fish Society	2. WRDA 2024 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 Congressional intent behind the Water Resources Development Acts of 2020, 2022, and 2024.***1*** The Corps' refusal to update the "Purpose and Need" statement to accommodate this analysis—citing the "efficiency" mandates of the Fiscal Responsibility Act (FRA)—is a legal error. The specific statutory mandate of WRDA 2024 to analyze ceasing hydropower "notwithstanding hydropower being an authorized purpose" overrides general administrative goals for efficiency. In legal statutory construction, 'notwithstanding' functions as a directive to disregard the conflicting requirement. Congress explicitly instructed the Corps to set aside the authorized purpose of hydropower for the scope of this analysis. By refusing to update the 'Purpose and Need' statement to reflect this directive, the Corps is using the very constraint (the authorized purpose) that Congress expressly told them to override. The result is an analysis that fails from the outset, as Alternative 6 is tethered to an outdated Purpose and Need statement it cannot possibly meet. ***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 onhttps://www.nwp.usace.army.mil/WVS-EIS/*	The SEIS includes an alternative that ceased hydropower operations at USACE projects notwithstanding the Purpose and Need statement (Executive Summary, Sections 2.4 and 2.9). Alternative 6 eliminates the hydropower purpose as a constraint. To scope this alternative USACE relied on the plain language of Section 1326 of WRDA 2024, "The Secretary [of the Army] may not complete its review of, and consultation with other Federal agencies on, the operation and maintenance of the 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." USACE interprets Congress' listing of flood control, navigation, and other purposes in the beginning of Section 1326, but then omitting those same purposes in its direction to analyze an alternative that ceases hydropower operations as a deliberate omission. USACE complied with NEPA's statutory directive in developing a reasonable range of nine alternatives and considered the impact of ceasing hydropower on its other authorized purposes. USACE maintains that relying on Congress' direction in the Fiscal Responsibility Act to streamline the SEIS is appropriate especially when a very detailed EIS immediately preceded the supplement. Developing, modeling, and fully analyzing the original eight alternatives took six years. Supplementing to add an alternative that ceasing hydropower operations took another year, for a total of seven years. The revisions in the Fiscal Responsibility Act are directly aimed at making the process more efficient and timely.

Jennifer Fairbrother	Native Fish Society	3. 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 not 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.***2*** 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.***3*** 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.***4*** Because of the Corps' management discretion, the agency must operate dams in the Willamette System in compliance with the ESA's no-jeopardy and no-take mandates, 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.***5*** 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.***6*** 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.***7*** 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. Alternative operations, like extended draw downs, may provide alternative recreational opportunities that previously did not exist at these sites, such as opportunities to fish streams recreated during drawdowns in reservoir lakebeds.***8*** Finally, even if the Corps asserts it lacks the current authority to conduct certain operations or make improvements to protect ESA-listed fish, it retains the obligation to seek that authorization from Congress. ***2*** *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).* ***3*** *See NWF v. NMFS, 524 F.3d at 928-29.* ***4*** *Id. at 929 n. 8* ***5*** *NWF v. NMFS , 2017 WL 1829588, at *6, Aff 'd, 886 F.3d 803.* ***6*** *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).* ***7*** *See supra p. 4; Flood Control Act of 1950, Pub L. No. 81-516, § 204, 64 Stat. 163, 178-79*	USACE must operate the projects substantially in accordance with its authorizing documents and comply with the ESA. USACE identified structural modifications to continue current operations for the Congressionally mandated purposes while also meeting ESA requirements in Alternatives 1, 2a, 2b, 4, 5,and 6. NEPA allows USACE to analyze operations that are outside of its current authorities which it did in Alternatives 2a, 2b, 3a, 3b, 5 and 6. NEPA requires an agency to analyze a reasonable range of alternatives, not every iteration of an alternative. USACE complied with NEPA's statutory directive to develop then narrow the reasonable range of alternatives by considering the need for the study (to operate and maintain the Willamette System and comply with ESA); multiple rounds of comments from cooperating agencies and the public; and the other objectives detailed in Chapter 2 and Appendix A of the SEIS. The action alternatives include multiple operations that USACE does not have authority to perform. As stated in Chapter 2 of the draft SEIS, USACE analyzed a broad range of operational alternatives, including those outside of its current authorities. For example, Measure 40 at Cougar Dam would only allow USACE to reach the conservation pool for a few days once in 84-year period of record. This operation would prevent USACE from carrying out the irrigation, municipal and industrial water supply, and hydropower purposes met by the water stored in the conservation and hydropower pools. This operation along with several others would require Congressional approval prior to implementation. By evaluating these alternatives, USACE weighed the tradeoffs to species and other resources, including the time it would take to accomplish such drastic changes. Continuing with the Cougar Diversion Tunnel operations example, USACE identified the need for several studies including dam safety, disposition, and additional environmental compliance in addition to the need for Congressional approval. Each study adding further uncertainty and delay to implementation. These tradeoffs described in the SEIS will be considered by the decision maker in selecting an action.

Commenter Name	Commenter Affiliation	Comment	USACE Response
		(1950). ***8*** *Urness, Z. (2025, December 5). Trout fishing hot in Oregon river that only forms for a few weeks. Statesman Journal.https://www.statesmanjournal.com/story/travel/outdoors/2025/12/05/trout-fishing-lookout-point-drawdown-oregon -new-river/87592254007/*	
Jennifer Fairbrother	Native Fish Society	4. The Corps' Alternative 6 Falls Short of What Congress Intended By analyzing only one "no-hydropower" alternative, the Corps has limited the public's ability to understand what's truly possible for fish recovery. Alternative 6 removes all hydropower infrastructure but keeps the same costly and likely ineffective fish-collection facilities from the draft EIS' preferred alternative. This narrowly defined option does not reflect the full range of options Congress expected when it required the Corps to study ending commercial hydropower in the Willamette system. What's missing is a dam-by-dam analysis of other viable approaches—such as leaving hydropower infrastructure in place but no longer generating commercial power. Without these options, decision-makers and the public don't have the information needed to choose a plan that will actually help native fish recover. 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: a. Volitional downstream passage during as much of the year as possible, with particular emphasis on fall through spring periods critical for juvenile salmonid outmigration. b. Maximum operational flexibility that does not require adherence to existing refill rule curves and that can account for changing precipitation patterns and temperature regimes. Specifically, analysis should consider what operations are available when the constraint of maintaining the power pool is eliminated.	In developing Alternative 6, USACE took a reasoned approach, using the plain language of WRDA 24 Section 1326 and the need to safely operate the dams for the remaining authorized purposes. Its rationale is detailed in Appendix A. USACE realized removing the hydropower pool provides limited operational flexibility because it stores significantly less water than the conservation pool for fish and wildlife, irrigation, and other purposes. SEIS Section 1.11.2.2 Operational Considerations for Hydropower describes the sizes of the pools at hydropower projects. For example, not filling the hydropower pool at Detroit reservoir but still storing water for irrigation, water quality, and municipal and industrial water supply, means the top of the reservoir would be rest just below the spillway. This eliminates a successful route for downstream fish passage in the summer and holds the pool well above the next available fish outlet. Appendix A of the SEIS includes a dam by dam evaluation of non-hydropower measures developed for Alternatives 6 (Appendix A, Chapter 2.6). The SEIS assessed the measures for ceasing federal hydropower operations at each dam (SEIS Chapter 2.8.5; SEIS Table 23) and incorporated by reference Measure 304: Augment Instream Flows by Using the Power Pool. USACE analyzed numerous volitional passage operations dam by dam in Alternatives 2a, 2b, 5, 6, and in particular Alternatives 3a and 3b. For example, Alternative 5 analyzes a volitional passage operation via an outlet that would eliminate USACE's ability to carry out irrigation, navigation, water quality, and water supply for all but one day in the 84-year period of record. Updating the rule curve is beyond the scope of the SEIS. Studying changes to the rule curve would impact USACE's flood control mission due to posing an unacceptable risk to life safety, thus were screened out from consideration as part of this effort.

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Jennifer Fairbrother	Native Fish Society	5. The Flawed Definition Of Ceasing Commercial Hydropower: Analyzing Non-Destructive Alternatives The DSEIS defines "Ceasing Federal Hydropower" as the total removal of turbines and the installation of cone valves to dissipate energy. The Corps then concludes that this configuration would result in worse outcomes for fish due to high mortality rates through these valves and increased Total Dissolved Gas (TDG). This is a manufacturing defect in the alternative. Ceasing commercial hydropower does not require the physical removal of turbines or the installation of lethal valves. Other options that should be addressed include: 1. Non-generating Operations: Maintaining the existing hydropower infrastructure but only operating as necessary to improve water quality, maintain dam safety, and provide for dam maintenance needs. Analysis of alternative operations should include extended drawdowns like what is proposed for Cougar Dam and reservoir in the draft EIS Preferred Alternative and incorporated into the 2024 Biological Opinion. 2. Alternative turbine configurations to improve fish passage survival: The Corps failed to analyze the use of "fish-friendly" infrastructure like alternative turbine designs, such as the fixed-blade designs successfully installed by the Corps at Ice Harbor Dam (achieving ~98% juvenile survival). The Corps should consider the ability to design similar turbines for the Willamette's high-head dams and the cost and impacts to fish recovery of using alternative turbine designs as opposed to the cost of unproven fish collection facilities for downstream passage. The Corps also did not explore possible alterations to penstock routes that could dissipate energy without the use of cone valves. For instance, the Corps discussed in the examples of fish passage infrastructure at Green Peter in which extended horizontal runs enable the dissipation of the hydraulic energy to enable fish passage.***9*** By failing to analyze any alternative options to full removal of the turbine infrastructure, the Corps has chosen an alternative that maximizes cost and fish mortality merely to justify rejecting the concept of ceasing commercial hydropower. ***9*** *USACE Portland. (2025, November 21). Willamette Valley System Draft Supplemental EIS Public Meeting – Nov. 19, 2025 - Evening Session [Video]. YouTube. https://www.youtube.com/watch?v=RyrjPIUFhz8*	Chapter 2 references the reader to Appendix A for greater detail and clarity on how Alternative 6 was developed. "Non-generating Operations" and the "Alternative turbine configurations to improve fish passage survival" would continue the generation of hydropower. Under the plain language interpretation of the text of Sec 1326 of WRDA 24, "analyzes an alternative that ceases hydropower operations" means USACE would stop generating hydropower and carrying out operations that specifically supported generation. See Section 2.9 Alternatives Considered but Eliminated from Further Review. An analysis of alternative operations including extended drawdowns was assessed under Alternatives 3a and 3b. Extended drawdowns to run of river was screened early on in the EIS process as this would eliminate all other purposes, such as irrigation, municipal and industrial water supply, and water quality not meeting the language in WRDA 24 or the purpose and need for the study. WRDA 24 exclusively asked USACE to assess an alternative that ceases hydropower, not other authorized purposes. The Executive Summary and Section 2.4 discuss the reason for evaluating Alternative 6 in the Draft SEIS despite not meeting the Purpose and Need, a criteria used for screening other alternatives. Regarding "possible alterations to penstock routes that could dissipate energy without the use of cone valves," USACE did assess and propose, in some cases where appropriate, alternative dissipation structures to cone valves, in-line orifices. Appendix A Section 2.6.4 discusses the reason for proposing either cone valves or in-line orifices based on each dam's unique configuration and associated infrastructure. Based on the available technology, USACE subject matter expertise and best professional judgement, these are the only known technologies compatible with the WVS hydropower dam infrastructure at the time of the analysis. Appendix A also discusses why USACE elected to continue to use the penstock outlets to pass water to address dam safety concerns.
Jennifer Fairbrother	Native Fish Society	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: ● Permanently or seasonally lowering reservoirs to within 20-50 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***10*** ● Managing release of flood ***10*** *Water Resources Development Act of 2020, Pub. L. No. 116-260, § 402(d) (2020).*	USACE interprets Congress' listing of flood control, navigation, and other purposes in the beginning of WRDA 24 Section 1326 and excluding it in its direction to analyze ceasing hydropower operation as a deliberate omission, or direction to not analyze eliminating other purposes. As detailed in Appendix A, extended drawdowns and run of river operations to the lowest outlets at the dams were screened from further analysis because they eliminate or cease operations for irrigation and water supply, and thus do not meet the purpose and need or the language included in Section 1326 of WRDA 24. The storage allocations set forth in "Willamette Basin Review" and codified in WRDA are tied to the other purposes served by the conservation pool including irrigation and municipal and industrial water supply. Because the water stored for these purposes is significantly larger than the amount of water stored exclusively for hydropower generation ceasing operations, including storage, for hydropower provides limited additional operational flexibility.

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Jennifer Fairbrother	Native Fish Society	Specific Elements Suggested For Analysis 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	The nine alternatives analyzed in the WVS EIS and SEIS included a range of operational and structural measures for fish passage and water quality. TDG reduction features, modification of the regulating outlets, and other engineering solutions including weir modifications were analyzed as part of one of the nine alternatives. Removal and/ or modification of hydropower infrastructure was analyzed as part of Alternative 6. See Appendix A for a more detailed description of each alternative.
Jennifer Fairbrother	Native Fish Society	Specific Elements Suggested For Analysis 3. 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 should 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 ● Operate without power-peaking flows ● 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)	Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at WVS projects. WRDA did not instruct the USACE to consider dam removal as that option would require eliminating all authorized purposes, not just hydropower, at a dam. Under Alternative 6 the dams operate without power-peaking flows because they are no longer needed if the dams are not producing hydropower.

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Jennifer Fairbrother	Native Fish Society	Specific Elements Suggested For Analysis 4. 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 Lookout Point Dam: The 2024 BiOp RPA states that the Corps should monitor the interim downstream passage measures before deciding to proceed with an unproven fish passage structure. The Corps should analyze enhanced alternative downstream passage operations (see point 1 of this section) that could be conducted if commercial power production is eliminated.	USACE considered structural modifications and operational passage at Hills Creek Dam. An floating collector was determined to be the best solution so that fish could be trucked below the other two dams directly downstream of Hills Creek, Lookout Point and Dexter. Impacts to bull trout from the structures and operations can be found in Chapter 3. USACE looked at the operational flexibility ceasing hydropower operations would provide including using the hydropower pool for other purposes or not storing water in the hydropower pool. Lookout Point Reservoir holds the largest amount of water in the conservation pool of any reservoir. USACE realized removing the hydropower pool provides limited operational flexibility because it is much smaller (holds considerable less water) than the conservation pool for fish and wildlife, irrigation, and other purposes. (SEIS Section 1.11.2.2 Operational Considerations for Hydropower describes the sizes of the pools at hydropower projects.) For example, not filling the hydropower pool at Lookout Point but continuing to store for irrigation and municipal and industrial water supply, meant the top of the pool rested below the spillway, cutting off a successful route for fish passage in the summer, but holding well above the next available outlet. See Appendix A for additional information about how alternatives and measures were screened.
Jennifer Fairbrother	Native Fish Society	Specific Elements Suggested For Analysis 5. Flexible Reservoir and Flow Management The SEIS should analyze operational flexibility that does not mandate adherence to static rule curves, including consideration of: ● Alternatives that do not include the constraints of maintaining a power pool ● 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	The SEIS analyzed delayed refills and fall drawdowns, as well as, Measure 304: Augment Instream Flows by Using the Power Pool dam by dam across all eight alternatives. These measures significantly impact or eliminate the power pool thus it was not a constraint in measure development. The EIS analyzes the 2008 BiOp flow targets that prioritize spring flows over summer augmentation. The impacts analysis shows a clear detriment to temperatures in doing so. Spring spill operations are the most effective for facilitating safe outmigration but present the tradeoff of increased TDG. USACE analyzed a reasonable range of nine alternatives that compared structural and operational modifications including the cessation of hydropower operations to improve fish passage.
Jennifer Fairbrother	Native Fish Society	Specific Elements Suggested For Analysis 6. Climate Change Integration We found that the analysis in the draft 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. To be clear, we are not referring to the impact of the alternatives on climate change, but rather the impact of climate change on the effectiveness of the alternatives.	USACE determined the 84-year period of record used for the hydrological model (ResSim) represented a wide range of hydrological conditions, including potential future hydrometeorological conditions. Prior to the release of this SEIS, the President issued Executive Order 14154 “Unleashing American Energy.” The SEIS is consistent with the NEPA statute and existing agency regulations pertaining to air quality and emissions.

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Jennifer Fairbrother	Native Fish Society	Strong Support for the Deep Drawdown at Detroit Reservoir Native Fish Society strongly supports the Corps' proposal to implement a deep drawdown of Detroit Reservoir each fall/winter to facilitate downstream passage for juvenile fish. As highlighted in the SEIS, this operation is one of the most effective tools available to help endangered Upper Willamette River spring Chinook and winter steelhead survive their migration to the ocean. Executing this drawdown is also a component of meeting the Reasonable and Prudent Alternative under the 2024 Biological Opinion for the WVS. We specifically endorse the Corps' proposed three-year phased approach to reaching the target drawdown elevation. This stepwise strategy is a reasonable adaptive management method to manage the mobilization of reservoir sediments, thereby reducing acute impacts to downstream water quality and municipal water supplies while still achieving fish passage goals. We urge the Corps to prioritize this measure as a consistent, annual practice and refine the operation using real-time monitoring, adaptive management, and the best available science.	Thank you for your comments. They will be taken under consideration.
Jennifer Fairbrother	Native Fish Society	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. Substantive no-commercial hydropower alternatives 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 a suite of alternatives serious consideration and robust analysis in the SEIS. A one size fits all approach for this alternative is not sufficient. The Corps should undertake a dam by dam analysis to determine the best overall scenario for fish while still meeting the other authorized purposes of the WVS. The comprehensive analysis requested in this letter is essential, as the future of iconic Pacific Northwest salmon and steelhead runs may well depend on it.	Thank you for your comments. They will be taken under consideration. Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
David Neal	Linn Soil and Water Conservation District	We thank you for the opportunity to comment on the Supplemental Environmental Impact Statement for the Willamette Valley System, particularly as it relates to Detroit Dam in Marion County and Foster and Green Peter Dams in Linn County. Linn Soil & Water Conservation District is very concerned about water quality and water quantity. By its rapid drawdown from the rule curve of Green Peter in July of 2023, the decision negatively affected water quality with increased turbidity, increased Total Suspended Solids (TSS), increased erosion and sedimentation. As the reservoir pool decreased, additional cutting of the waterways above increased erosion. The rapid drawdown did not allow enough time for vegetation to grow on the steep banks to aid in filtration of eroded soils. Reduced pool volume concentrated any pollutants contained in the reservoir. The South Santiam Subbasin has stream segments listed under section 303 (d) of the federal Clean Water Act. Water supply is identified by the USACE as a reservoir benefit. The drawdowns will negatively affect water quantity available for irrigation, fish and wildlife, and hydropower production. Moving forward, the region needs more water storage capacity and more electrical production; not less. We appreciate your consideration of our concerns regarding water quality and water quantity as you determine your best option.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats. USACE assessed elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure shows model results and does not show how real-time water management can minimize negative effects to reservoir elevations. The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill.
Julia Hajduk	City of Stayton	The City of Stayton submits the following comments on the U.S. Army Corps of Engineers' November 2025 Draft Supplemental Environmental Impact Statement ("Draft SEIS") for the operation and maintenance of the Willamette Valley System. The City draws its water from the North Santiam River, downstream of Detroit Reservoir. While the Draft SEIS recognizes adverse impacts to downstream water systems and water quality from a drawdown of the reservoir, it does so generically and vaguely, without any indication that the Corps understands the significant impacts to the City's water treatment systems and ability to provide water to residents and for critical City functions. As a result, the Draft SEIS also fails to identify any mitigation for this effect. The Draft SEIS thus does nothing to reassure the City and its residents that the Corps not only understands that the drawdown of the Detroit Reservoir could destroy millions of dollars of City infrastructure and prevent the delivery of any water for personal and municipal uses but intends to ensure that, if the drawdown goes forward, the Corps will ensure that the effects are mitigated.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats. USACE assessed elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Julia Hajduk	City of Stayton	I. The Draft SEIS Does Not Sufficiently Identify Effects of the Detroit Reservoir Drawdown on City of Stayton Infrastructure & Water Use. The Draft SEIS generically acknowledges that an effect of the proposed interim operations, including the late fall/early winter deep drawdown at Detroit Reservoir, will be to mobilize fine sediments and result in increased downstream turbidity, with associated effects to water quality and water treatment facilities. However, the Draft SEIS lacks the type of detailed evaluation of this effect that is required and that would allow the Corps to undertake a complete mitigation analysis. For example, the Draft SEIS identifies only increased maintenance and staffing of water treatment facilities and potential, unstated effects on water quality (e.g. at 170, 211). This reflects a lack of understanding that the type of municipal water treatment systems downstream of the Detroit Reservoir differ from those on the South Santiam in meaningful ways that will result in a significant and direct adverse effect on those systems and the communities they supply. While the Draft SEIS references filtration broadly, it does not mention or evaluate the effect of a drawdown on the use of slow sand filtration (SSF) systems by multiple municipal water purveyors on the North Santiam River. SSF systems differ materially from rapid rate filtration, membrane treatment, or chemically assisted filtration processes (types used by South Santiam municipalities) in both design intent and operational resilience. As a result, generalized treatment references in the Draft SEIS do not adequately or accurately address how the sediment characteristics anticipated under the proposed action would affect SSF systems.	Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. Mitigating impacts are not a statutory requirement of NEPA. USACE shaped the Detroit drawdown operation to mitigate adverse effects by minimizing impacts to water quality, drinking water facilities, and recreation including sport fisheries. It then analyzed the effect of the operation on each of the resource categories identified in Chapter 3. USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown.

Julia Hajduk	City of Stayton	A. SSF Systems are Inherently Vulnerable to Very Fine Suspended Sediments and Elevated Turb SSF systems vulnerability to fine suspended sediments is especially acute when those particles are dominated by silts, clays, colloids, organic fines, or algae. This vulnerability is a direct consequence of how slow sand filters function and where their treatment effectiveness is concentrated. The primary treatment mechanism of a slow sand filter occurs at the surface biological layer (schmutzdecke) and within the upper½ inch of the sand bed. Under normal operating conditions, this biologically active layer effectively removes pathogens and low concentrations of particulate matter through a combination of physical straining, adsorption, and biological degradation. However, when raw water contains sustained or episodic high turbidity, especially when dominated by very fine particles, those particles rapidly accumulate at the filter surface for turbidities greater than 10 NTU. ***1*** This leads to premature clogging, a sharp increase in , reduced hydraulic capacity, and shortened filter run times. Very fine sediments are particularly problematic because they: • Penetrate and compact the sand, • Are poorly removed by simple sedimentation or hydraulic buffering upstream,• Can smother or disrupt the schm , reducing biological treatment effectiveness, • Are slow to clear once loading subsides, even after turbidity levels return to baseline.As turbidity increases, slow sand filters experience a non-linear loss of performance, where small increases in fine sediment loading can result in disproportionate reductions in filter run time and treated water output. This condition often necessitates frequent scraping or removal of the top sand layer, accelerating media loss, increasing labor demands, and reducing overall system reliability. Once a slow sand filter is cleaned by scraping and the schmutzdecke is removed, the filter temporarily loses its primary fine-particle retention and biological treatment barrier. During this post-cleaning period, particularly if raw water turbidity remains elevated or is dominated by very fine sediments, fine particles penetrate deeper into the sand bed rather than being intercepted at the surface. This deep bed penetration results in the progressive accumulation of fines within the interstitial pore spaces of the sand matrix, leading to internal clogging that is not readily reversible through surface scraping alone. Therefore, subsequent filter runs become progressively shorter, development accelerates, and cleaning frequency increases - creating a compounding cycle of reduced performance and increased maintenance demand. Repeated cleaning under these conditions also leads to: • Accelerated loss of filter media due to frequent removal of the upper sand layers,• Reduction in effective bed depth and treatment capacity, • Increased risk of fines breakthrough during the filter ripening period before the schmutzdecke is fully , • Elevated potential for turbidity spikes or particulate passage into finished water, particularly during start-up following maintenance.Over time, the combination of deep bed fouling, media loss, and shortened ripening periods can compromise both the hydraulic and treatment integrity of the filter, ultimately necessitating partial or full media replacement. These impacts are especially pronounced under conditions of recurring fine sediment loading, such as those associated with reservoir drawdowns, watershed disturbance, or prolonged elevated turbidity events. Accordingly, SSF systems exposed to fine sediment dominated turbidity face a cumulative degradation of	Thank you for your comments. Section 3.19 of the SEIS was updated to expand on effects to the North Santiam drinking water facilities.

		performance, rather than isolated operational challenges, reinforcing the need for effective pretreatment, conservative operational thresholds, and alternative treatment or supply strategies during high-risk raw water conditions. SSF systems are therefore best suited to consistently low-turbidity source waters with limited fine sediment variability. They are not resilient to highly variable or storm-driven turbidity events, nor to conditions involving reservoir drawdowns, watershed disturbances, or algal and organic fines. Without adequate upstream pretreatment such as roughing-filters, bank filtration, off-stream storage, or advanced pretreatment processes, SSF systems face a heightened risk of operational failure during fine sediment loading events. In summary, SSF systems are operationally fragile when exposed to very fine sediments and elevated turbidity, making source-water protection, pretreatment, and conservative operational thresholds critical to maintaining compliance and system reliability. Recent operability testing and system evaluations conducted by the City of Salem to evaluate the effect of higher turbidity on its slow sand filters indicate that sustained finesediment-dominated and high turbidity conditions comparable to those anticipated during deep drawdown operations would rapidly compromise the operability of direct online SSF systems. Such conditions are expected to result in accelerated surface clogging, deep bed penetration of fine materials following cleaning, shortened filter run times, loss of effective biological treatment capacity, and heightened risk of particulate breakthrough during filter ripening. These outcomes would likely render continuous operation of SSF systems unsustainable over a very short operational period without alternative supply activation or substantial pretreatment. Unlike the City of Salem, which utilizes some pre-treatment that may reduce turbidity or the percentage of finer sediment particles, the City of Stayton utilizes a direct online SSF system. Direct online SSF systems receive "raw" water directly from the running river. Thus, Stayton's water treatment infrastructure is at even greater risk of turbidity related impacts from the Detroit Reservoir drawdown than the City of Salem. The impacts described herein do not constitute a mere issue of temporary exceedance of drinking water quality standards or treatability. Rather, the projected fine sediment-dominated turbidity conditions associated with the Detroit Reservoir drawdown present a material risk of physical and functional destruction of critical drinking water treatment infrastructure. ***2*** Under sustained or recurring fine sediment loading, SSF systems are subject to irreversible or near-irreversible operational failure mechanisms, including deep bed fouling, accelerated and umecoverable media loss, collapse of biological treatment function, and structural degradation of the filter bed. These impacts are not correctable through standard operational adjustments or short-term compliance measures and extend beyond the scope of conventional drinking water standards enforcement or treatment optimization. As a result, the foreseeable consequence of the Detroit Reservoir drawdown is not merely degraded water quality or the need for increased staffing or maintenance, but the inability of affected municipal water systems to operate at all, leading to a cessation of potable water production. This would directly impair the provision of water for essential municipal purposes, including residential supply, fire protection, public health and sanitation, and other critical community functions. Once such infrastructure failure occurs, service cannot be restored without substantial reconstruction, extended outages, and reliance on alternative water supplies. Accordingly, this effect must also be evaluated as an infrastructure impairment and service continuity risk, rather than only a drinking water standards or maintenance cost issue. Failure to do so will result in understatement of the severity of reasonably foreseeable effect, mischaracterize the nature of the harm, and preclude informed decision-making regarding avoidance,	

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		minimization, and compensation measures necessary to protect public health and essential municipal services. ***1*** *The Corps typically refers to FTU, Formazin Turbidity Units, while modern water treatment relies on NTU (Nephelometric Turbidity Units). FTU is a legacy turbidity unit derived from non-standardized nephelometric measurements, whereas NTU is the current standardized and regulatory unit; such values should not be assumed to be directly interchangeable, and when evaluating turbidity for the purpose of effects on treatment systems, the Corps should utilize NTU consistently.* ***2*** *This contrasts with the types of water treatment systems used by municipalities on the South Santiam River, which while degraded in effectiveness and life span during the 2023 and 2024 Green Peter drawdown, were not functionally destroyed.*	

Julia Hajduk	City of Stayton	B. Necessary Revisions to the Draft SEIS to Fully Analyze Impacts The FEIS and Draft SIES do not sufficiently identify and analyze impacts to communities and infrastructure anticipated to result from the Detroit Reservoir drawdown. Considering the high risk that the proposed interim operations will cause physical and functional destruction of the City of Stayton's drinking water treatment infrastructure, rather than merely temporary drinking water standards exceedances, the City respectfully requests that the Final SEIS include the following analysis to ensure full understanding, informed decision making, and protection of essential municipal services. a. Explicit Identification of Vulnerable Treatment Infrastructure The Final SEIS should explicitly identify the presence of SSF municipal drinking water treatment systems and, more explicitly, direct online SSF systems, downstream of Detroit Dam and acknowledge that these systems are inherently vulnerable to fine sediment-dominated and sustained high turbidity conditions to a degree not experienced by other types of treatments systems, including those on the South Santiam River. b. Treatment- and Infrastructure-Specific Impact Analysis The Final SEIS should evaluate treatment-process-level impacts, not solely source-water quality changes, including: o Deep-bed penetration of fine sediments following filter cleaning, o Accelerated and unrecoverable filter media loss, o Collapse of biological treatment function, o Compounding maintenance and cleaning requirements, o Risk of particulate and turbidity breakthrough during filter ripening, and o The potential for complete loss of treatment operability over even short drawdown periods. The Draft SEIS recognizes that there will be a "moderate increase in sediment and turbidity levels downstream of Detroit Reservoir." (ES-9). However, nothing in the draft indicates the meaning of moderate in this context or The Final SEIS cannot reasonably compare alternatives without a clear recognition and understanding of the vulnerabilities of water treatment systems downstream of Detroit Reservoir. The Final SEIS should explicitly assess the risk that the proposed drawdown of the Detroit reservoir would result in physical impairment or destruction of the City's treatment infrastructure, leading to the cessation of potable water production, rather than only temporary noncompliance with drinking water standards. This assessment should address impacts to: o Residential water supply, o Fire protection and emergency response, o Public health and sanitation, o Other essential municipal and community functions. c. Cumulative and Recurrent Impacts Analysis Because the Detroit Reservoir drawdown is an action planned to be repeated at least annually, the Final SEIS should analyze the cumulative effects of recurring or multi-year drawdown-related turbidity events on SSF systems, including progressive degradation, loss of remaining useful life, and the increasing likelihood of permanent infrastructure failure over the interim operations period. This analysis is particularly important given that, even after a significant 2023 drawdown that caused massive turbidity increases in the South Santiam River, during the 2024 drawdown, the City of Sweet Home again experienced such significant turbidity that its drinking water treatment system struggled, and a state of emergency was declared. The Corps' use of adaptive management to mitigate effects of the drawdown by immediately ceasing the interim operation to prevent further harm to the	Based on the detailed information provided by commentors, USACE updated Section 3.19 to clarify and disclose impacts unique to the North Santiam facilities, including SSF systems. The SEIS analyzes turbidity impacts, which are the direct effect of USACE operations, as well as how USACE will utilize operate to mitigate those specific impacts to downstream users by taking a measured approach to minimize and avoid certain impacts. The measured approach includes using a stepwise approach to lower the reservoir to a deeper elevation each year. By only lowering the reservoir by a small amount each year instead of the full 55 feet in one year there will be less sediment mobilized. Additionally, USACE will use its operational discretion and real time information to change, pause or cease the operation based on acceptable levels of turbidity to be determined with the downstream water purveyors and the State of Oregon's Department of Environmental Quality and Oregon Health Authority in an Emergency Response and Communications Plan. These minimization measures were developed utilizing the data collected from the Fall Creek, Cougar, Green Peter, and Lookout Point fish passage drawdowns and the previous operations at Detroit Reservoir as well as modeling data. However, the exact amount of turbidity in any given year cannot be accurately predicted due to all of the natural and extraneous factors that go into managing a reservoir system and how real time operations are then used to reduce those impacts. Therefore, USACE used high quality information and its professional judgement as well as comments to understand of the impacts to downstream users. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure shows model results and does not show how real-time water management can minimize negative effects to reservoir elevations. The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill. The SEIS also includes a a discussion of socioeconomic impacts. The cumulative impacts analysis required under NEPA is bound by reasonably foreseeable effects to USACE's actions like turbidity and water supply, as well as effects to downstream communities including impacts to drinking water facilities and wildfire. The drawdown at Detroit in 2025 was to minimum conservation pool which is the same elevation that USACE targets every year.

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		City of Sweet Home is laudable. However, considering that experience, it is concerning that the SEIS does not fully evaluate the effects of a 2025 Detroit Reservoir drawdown on downstream municipal water systems, and in particular SSF systems which are much more sensitive to turbidity and fines than those on the South Santiam.	
Julia Hajduk	City of Stayton	II. The Draft SEIS Fails to Identify Mitigation Measures for Water Treatment & Infrastructure Impacts. If the Corps determines that the proposed action will occur despite the high risk of major impacts to the City of Stayton, the Corps must identify and describe options for avoiding and minimizing the impacts in the Final SEIS. Given the significance of the risk, the Corps also should identify compensatory mitigation options to be implemented either as alternatives to avoidance and minimization, or because of effects on City infrastructure despite efforts to avoid and minimize them. While the Draft SEIS indicates that an "Emergency Response and Communications Plan" will be utilized, it does not identify what that plan will cover, how and when it will be developed, and whether stakeholders, including the City of Stayton, will provide input on its development. ***3*** The mere indication that an undefined "plan" will be used by the Corp does not satisfy the requirement to identify mitigation options.***4*** ***3*** *To the extent such a plan already exists for the Detroit Drawdown, the City has not found it in the FEIS, Draft SEIS, ROD or on the Corps' website.* ***4*** *The Corps' April 2025 Final Environmental Impact Statement for the Willamette Valley System Operations and Maintenance barely acknowledge impacts to community water systems and does not even mention mitigation for such impacts, much less an emergency communication plan, despite being published after the adverse effects of the 2023 and 2024 Green Peter Reservoir drawdowns were known.*	Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. Mitigating impacts are not a statutory requirement of NEPA nor does it give USACE the authority to mitigate for impacts. USACE shaped the Detroit drawdown operation to mitigate adverse effects by minimizing impacts to water quality, drinking water facilities, and recreation including sport fisheries. It then analyzed the effect of the operation on each of the resource categories identified in Chapter 3. USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown. Emergency Response and Communications Plan for other drawdowns and would be updated to include how and when to coordinate with North Santiam communities, specifically the drinking water facilities. The plan would be updated with key metrics to determine how to safely perform the drawdowns in coordination with state experts. This effort is separate from the SEIS.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Julia Hajduk	City of Stayton	A. Avoidance and Minimization Measures Avoidance and minimization options necessary to prevent infrastructure damage should include, but are not limited to the following practices and limitations: i. Turbidity Monitoring - Location and Particle Size The location at which turbidity is monitored during a drawdown of the Detroit reservoir is critical to the meaningful protection of downstream drinking water treatment infrastructure. The draft SEIS identified the turbidity monitoring location as Niagara, i.e. after release of water from the Detroit dam. Turbidity monitoring conducted at Niagara or below spillway and outlet releases is inherently insufficient for operational decision making because it detects sediment conditions after fine materials have already been entrained, mixed, and irreversibly released downstream. Fine sediment-dominated turbidity, particularly silts, clays, colloidal particles, and organic fines, behaves fundamentally differently from coarser suspended material. These fine particles remain in suspension for extended periods, are not effectively attenuated once mobilized, and can penetrate deep into SSF beds once introduced into downstream treatment systems. Detection of elevated turbidity at a post-spillway or downstream monitoring location therefore occurs too late to prevent infrastructure damage or operational failure, as the sediment pulse has already entered the river system and is no longer controllable. To be operationally meaningful, turbidity monitoring must be conducted in-pool and upstream of release structures, where sediment mobilization can be detected prior to discharge and where adaptive management actions-such as modifying drawdown rates, suspending the drawdown, or activating alternative operations-remain feasible. In pool monitoring provides early indication of fine sediment entrainment, including the mobilization of legacy sediments exposed during drawdown, which are most likely to produce the fine particle size fractions that pose the greatest risk to SSF systems. Reliance on post-spillway turbidity monitoring conflates impact confirmation with impact prevention and fails to account for the time lag between sediment mobilization, downstream transport, and treatment system exposure. Because SSF systems are vulnerable to rapid and irreversible degradation once fine sediment enters the treatment process, monitoring that occurs after release does not provide a practicable opportunity to avoid infrastructure damage or service interruption. The Final SEIS 's identification of mitigation options must acknowledge that monitoring limited to post-spillway or downstream locations is insufficient for infrastructure protection and shall not be relied upon as the sole basis for operational decision making. Accordingly, to satisfy NEPA's requirement for meaningful impact disclosure and mitigation, turbidity monitoring associated with interim operations must be relocated or supplemented with in-pool, upstream monitoring points specifically designed to detect fine sediment mobilization before discharge. Without such monitoring, the proposed operations lack an effective mechanism to prevent foreseeable infrastructure destruction and cessation of drinking water service in the City of Stayton.	USACE will monitor turbidity in-reservoir in addition to downstream locations before, during, and after the drawdown to inform its real time operations. USACE has been speaking with the affected communities about monitoring outside of the NEPA process.

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Julia Hajduk	City of Stayton	ii. Adaptive Management and Triggered Operational Responses The Final FEIS should articulate the components of an adaptive management plan aimed at avoiding and minimizing any effects on the City's infrastructure and ability to provide water for standard uses. Adaptive management for mitigation must include metrics and actions tied to the operational parameters and real-time status of the City's SSF system, and not solely to river turbidity monitoring results. Any adaptive management plan must include the following: • Monitoring metrics specific to treatment operability (not solely river turbidity), • Clear, enforceable operational triggers tied to infrastructure protection, and • Defined response actions when operability thresholds are approached or exceeded. Specific tools for this purpose should include: • Operational turbidity and fine sediment thresholds identified in advance of each drawdown that, if reached, preclude the drawdown, require that the drawdown depth be limited, or trigger immediate halting of the drawdown, • Modified drawdown timing, rate, or sequencing to limit sediment mobilization, • Sediment management or pretreatment requirements upstream of City water intake, and • Temporary and potentially permanent suspension of the drawdown during highrisk conditions, including when turbidity levels in the North Santiam River are higher than typical due to storms or other causes. Implementation of an adaptive management plan with these tools will require continuous direct communication and coordination between the Corps and the City of Stayton during any drawdown, and the Final SEIS should identify the importance of such communication to success of the adaptive management tools.	USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. The plan identifies key metrics determine how to safely perform the drawdowns in coordination with state experts and local communities. This effort is separate from the SEIS.
Julia Hajduk	City of Stayton	iii. Determine Depth of Each Incremental Drawdown Annually Based on Monitoring of Conditions The City appreciates that the Corps has recognized that the lack of an incremental approach to drawdowns of the Green Peter Reservoir led to major impacts on the water treatment systems of South Santiam municipalities and that a different approach is warranted for the Detroit Reservoir drawdowns on the North Santiam. However, given that the 2024 drawdown of the Green Peter Reservoir quickly resulted in emergency shutdown conditions for the City of Sweet Home despite the major flushing of accumulated sediment that had occurred during the 2023 drawdown, a rigid and pre-determined drawdown increases the likelihood that the impacts to the City's water treatment system described above will occur. Instead, the depth of the drawdown should be determined prior to commencement of each drawdown based on annual monitoring of the pool depth, turbidity, and depth and location of newly deposited sediments.	USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. Specifically, the Detroit deep drawdown would step-down 55 feet over several years to reach the target elevation of 1395 feet. The first year USACE would target 1425 feet, which is 25 feet lower than most years but is an elevation previously reached. Then based on the levels of turbidity the targeted elevation would go deeper each year until reaching 1395 feet (SEIS Section 2.8.6).

Commenter Name	Commenter Affiliation	Comment	USACE Response
Julia Hajduk	City of Stayton	B. Compensatory Mitigation The most reliable option for avoiding the effect identified above also provides the most certainty: compensatory mitigation. The Final SEIS must identify compensatory measures sufficient to preserve drinking water and municipal water services continuity. Several compensatory measures obviate the need for any avoidance and minimization measures, because they all allow the City to cease water intake from the North Santiam River at the inception of a drawdown. Other compensatory measures ensure that City residences and businesses, and critical City functions, always have water available and allow repair and replacement of the SSF system. Compensatory mitigation measures considered in the Final SEIS should include at least: • Guaranteed pre-drawdown access to alternative water supplies (e.g., interties to non-affected systems, off-channel storage, ASR), • Funding or implementation support for construction of pretreatment systems or existing systems' hardening, • Infrastructure replacement or rehabilitation provisions where damage is unavoidable, • Emergency response planning and cost recovery mechanisms. To the extent compensatory mitigation is required, the Corps should delay implementation of the Detroit Reservoir drawdown to 2028 because every option to protect the City of Stayton's municipal water system takes significant time to implement. ***5*** ***5*** *The Corps FEIS and draft SEIS do not mention socioeconomic impacts. Without compensatory mitigation, the damage to the City's SSF system will cause significant indirect socioeconomic impacts. The median income of the City of Stayton residents is approximately $72,000, significantly limiting the ability of the City and its residents to bear the costs associated with damage to its infrastructure or to independently fund provision of clean drinking water during any shutdown of its system. A failure of the potable water system would have immediate and severe consequences, potentially affect more than 10,000 residents and force the shutdown of businesses across Stayton and Sublimity (Sublimity's wastewater is disposed of through Stayton's wastewater system, which would fail to be operational without a potable water supply). Additionally, critical public safety, healthcare, and other essential facilities would be unable to operate, creating significant risks to public health, safety, and economic stability.*	USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. Mitigating impacts are not a statutory requirement of NEPA nor does it give USACE the authority to mitigate for impacts. USACE shaped the Detroit drawdown operation to mitigate adverse effects by minimizing impacts to water quality, drinking water facilities, and recreation including sport fisheries. USACE updated Section 3.19.4.1 to identify adverse effects to the cities of Sublimity and Stayton wastewater facilities. Section 3.11 of the SEIS analyze socioeconomic effects.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Julia Hajduk	City of Stayton	C. The Corps Should Refrain from Issuance of the Final SEIS and Postpone Detroit Reservoir Drawdowns Until Sediment and Turbidity Are Better Understood. The Draft SEIS notes that the Corps is engaging a sediment transport modeling team to develop tools to inform adaptive management. This modeling will shed light on the magnitude of the initial, cumulative and recurrent effects on municipal water treatment systems that will be caused by the turbidity that will accompany planned annual repetition of the Detroit Reservoir drawdown. Effective adaptive management is critical to prevent loss of use and destruction of treatment infrastructure. In addition, pursuant to the Water Resources Development Act of 2024, by January 2025, the Corps is expected to complete a report on the turbidity in the Willamette Valley System resulting from recent drawdowns. Given that the report will include analyses of lessons learned, changes in operations based on those lessons, and opportunities to minimize monetary strains on non-federal entities due to drawdown-related turbidity, the City of Stayton and other affected municipalities should be able to review and consider that report as it is highly relevant to the subject matter of these comments. Thus, finalization of the SEIS and any drawdown of the Detroit Reservoir should be postponed, allowing completion of modeling and the turbidity report, review of results of both by affected parties, and submission of comments on the SEIS considering that information.	This report was not completed prior to finalizing the SEIS; however, the underlying data was used to inform the water quality analysis in Chapter 3. USACE also updated the Final SEIS to more clearly highlight impacts to drinking water facilities in the North Santiam Canyon.
Julia Hajduk	City of Stayton	The City of Stayton appreciates the Corps' attention to this issue of critical importance to the City, its residents and businesses. Clear identification of the effects of the Detroit Reservoir Drawdown on City infrastructure not only are necessary to identify mitigation options but also to allow the Corps and City to work together to ensure that mitigation is sufficient and workable well in advance of the commencement of a drawdown.	Thank you for your comments. They will be taken under consideration.
Thomas Rumreich	Oregon Angler Alliance (OAA)	I'm the executive director of the Oregon Angler Alliance (OAA). We are a group of dedicated Oregonians who promote fish for fisheries because of the benefit to communities and the substantial economic impact that fishing creates. Fishing in Oregon is $1.5 billion a year industry. On behalf of the OAA, I would like to go on record opposing the plan to draw down Detroit Reservoir to protect Endangered Species Act (ESA) salmonids that pass through the reservoir. That statement may not seem congruent to our mission, but after closely examining the North Santiam River and the invaluable role that Detroit Reservoir plays in the health of that waterway you can understand our position. The North Santiam is certainly one of the most productive stream ecosystems in Western Oregon. Surveys of the macroinvertebrates and the abundance of naturally produced rainbow trout (Oncorhynchus mykiss) are just two indications of a productive stream. The credit to the productive nature of this stream is attributed to Detroit Dam and the management of the summertime water releases. These releases sufficiently augment stream flow - but also substantially keep the temperatures cool enough to promote a myriad of aquatic organisms that provide forage for hundreds of species of animals. Simply put, more water translates to more habitat and more aquatic organisms. Colder water is critical to the proliferation of many native species in Oregon.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Thomas Rumreich	Oregon Angler Alliance (OAA)	For 38 years I had the privilege of working on the South Coast of Oregon in the Salmon Trout Enhancement Program (STEP). One population we took tremendous pride in enhancing was the Coquille River Chinook (Oncorhynchus tshawytscha). When we began our restoration efforts in 1981, there were only about 8,000 Chinook in the watershed. In 2010, the population had expanded to over 32,000 fish. Unfortunately, concurrent to our efforts, smallmouth bass (Micropterus dolomieui) were illegally introduced into the watershed. In 2020, only ten years later, the population had dropped to only 278. On a global review of an exotic predator's impact on a native species, this is one of the most significant reductions in history. Smallmouth bass are abundant in the Santiam Watershed. Smallmouth are prevalent in the South and Main Santiam and are not very abundant in the North Santiam River. The spread of smallmouth in the North Santiam is believed to be held in check by the colder water in that river. Few smallmouth have been observed above Greens Bridge on the North Santiam. Fisheries researches have documented that some fish have temperature preferences to 1/100 of a degree Fahrenheit. Portions of the North Santiam have been documented to be 10 degrees cooler than the South or Main Santiam. The nonnative predatory fish, a large walleye (Sander vitreus) was caught in the lower Santiam River in 2025. Yet another nonnative predatory fish that has recently been illegally introduced into the Willamette Watershed is the spotted bass (Microterus punctulatus). The impacts of these fish to the Santiam watershed is not yet known. The colder water in the North Santiam could be that aquatic ecosystems salvation.	Thank you for your comments. They will be taken under consideration.
Thomas Rumreich	Oregon Angler Alliance (OAA)	As you know, the drawdown of Green Peter Reservoir on the South Santiam caused considerable environmental damage to that river. Green Peter was drawn down over the same concerns with ESA listed salmonid fish passage over the dam. When that reservoir was drawn down, the movement of silt out of the reservoir instantaneously killed thousands of fish. The impact of the silt on spawning riffles in the South Santiam was substantial. The silt fouled many spawning riffles to the point that in-gravel survival of salmonid eggs and fry was compromised. Aquatic microenterprise production was also compromised because the interstitial spaces in the stream substate that these organisms depend on for survival was destroyed for miles of the river. Suspended silt and sand also compromised water quality at South Santiam Hatchery and municipal water systems along the river. The concern is that if Detroit Reservoir is drawn down the same impacts to the stream ecosystem and municipal systems will prevail. The City of Salem and other towns are extremely concerned about not only the availability of water, but the quality of that water as well.	Regarding the fish killed during the Green Peter Reservoir drawdown, field sampling has documented those were due to effects of passage at Green Peter Dam (baurotrauma and other injuries), not from silt. USACE is not aware of empirical estimates of siltation occurring below Green Peter and Foster Dams, or of fish kills resulting from siltation relating to Green Peter Reservoir drawdown. USACE assumes there is not significant amounts settling out as most of the fine material moving downstream is expected to stay in suspension as "wash load." ODFW did note impacts to hatchery fish health at the South Santiam Hatchery located below Foster Dam due to high turbidity levels in 2023. To manage these types of risk for a Detroit deep drawdown, the proposal includes two key protections: 1) Phased Drawdown: The reservoir will be lowered cautiously in stages, not all at once. 2) Continuous Monitoring: Turbidity levels will be constantly measured at the dam's outlets. If the water becomes too muddy, the operation will be paused or stopped to allow the sediment to settle. This careful, monitored approach is designed to keep turbidity within levels down to protect the health of the fish that remain in the reservoir, as well as downstream. ODEQ and other regulatory agencies are cooperating agencies and providing USACE comments and recommendations on the WVS EIS and SEIS. Other deeper drawdowns at WVS reservoirs have shown turbidity levels reduce significantly after the initial year, and the timing and duration of the drawdown can also influence turbidity along with seasonal weather patterns.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Thomas Rumreich	Oregon Angler Alliance (OAA)	If the lake is drawn down for even short periods of time the prolific population of kokanee (Oncorhynchus nerka) that reside in the lake will be compromised. Kokanee provide a substantial fishery that has a substantial economic impact to the local community and to Oregon. A significant number of angler days each year are generated in the pursuit of kokanee and rainbow trout in the lake. The rainbow trout fishery would suffer as well from the current drawdown proposal. To lose these fisheries would not only have an impact on the economy of Oregon, but would also cause a reduction in angling opportunity that would translate to reduced license sales. The Oregon Department of Fish and Wildlife (ODFW) currently is experiencing a budget shortfall. License sales combined with a federal funding match are the cornerstone of ODFW's budget that supports the protections and enhancement of a myriad of fish and wildlife populations throughout Oregon. The drawdown of Detroit Lake will have a profound effect on the region. The reduction of recreational boating on the lake will create a significant economic hardship. Marinas, stores, restaurants, guides, motels, and dozens of other businesses will suffer from this proposal.	The local kokanee fishery at Green Peter Reservoir has experienced significant losses due to the deeper reservoir drawdowns. Studies from Green Peter have confirmed that the drawdown was effective at improving downstream passage and survival for juvenile Chinook salmon, which is the primary goal of the proposed action at Detroit. Significant impacts may also occur for kokanee in Detroit Reservoir with the proposed fall drawdown. The plan for Detroit has been designed to learn from Green Peter deep drawdowns. Key differences include: Timing: The drawdown is scheduled for late fall, when the water is cooler and kokanee are more widely distributed, reducing the risk of a mass casualty event. Scale: The drawdown would be less extreme than what occurred at Green Peter, leaving a larger portion of the reservoir intact. While impacts to the kokanee population would occur, these measures are expected to reduce impacts in comparison to those observed at Green Peter. Although there could still be significant impacts to the kokanee fishery, a late-fall drawdown schedule would help reduce impacts on both the kokanee fishery and the peak summer recreation season, thereby reducing economic disruption. USACE updated Appendix K Recreation, Figure 1-2 through Figure 1-6 to show year-round water levels under different precipitation scenarios. Boat ramp access will rarely be different as a result of the deep drawdown operation, as naturally occurring hydrology is the biggest driver. These effects will be further reduced by current water management operations and in season adjustments. USACE updated Chapter 3.11 Socioeconomics, to clarify economic impacts analysis and scale.
Thomas Rumreich	Oregon Angler Alliance (OAA)	The OAA has been involved with limitations of salmonids in lakes for over four decades. On the south coast our problem has been that the once robust population of coho (Oncorhynchus kisutch) in Tenmile Lakes has been reduced to a remnant population because of the illegal introduction of warm-water predatory fish. We have been successful with a series of traps to prevent predation in the lake by removing the coho with a series of traps. In a single season we salvaged 35,000 coho. This same technology could be applied to moving salmonids though or around Detroit Lake.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Thomas Rumreich	Oregon Angler Alliance (OAA)	In summary, the OAA opposes the drawdown of Detroit Lake because of the potential devastating impacts that this strategy will have on the populations of native fish in the North Santiam. We recognize that some ESA listed may be lost by the lack of adequate downstream fish passage at Detroit Dam, but that the compromise of the exceptional aquatic ecosystem facilitated by the dam in the North Santiam far outweighs that loss. We recognize that in this litigious society the Corps has a great deal of pressure placed on them to comply. There can also be liability if this proposal is counter-productive in providing protection to the North Santiam salmonids residing below the dam. Those entities that are pressuring the Corps to provide better fish passage at Detroit Dam should realize that to truly protect the native salmonid populations of Oregon, the "court room" is not the best place to serve these invaluable natural resources. The halls of the legislature are the better arena to save these fish by facilitating stricter laws to slow the illegal introductions of non-native predatory fish.	Thank you for your comments. They will be taken under consideration.
Michael Karnosh, Chris Mercier	CTGR	On behalf of the Confederated Tribes of the Grand Ronde Community of Oregon (Grand Ronde or Tribe), thank you for the opportunity to comment on the SEIS for the operation of the Willamette Valley System dams. Through Cooperating Agency meetings, government-to-government consultation, verbal and written comments submitted in U.S. Army Corps of Engineers (Corps) processes, Grand Ronde has communicated its questions and concerns about the Willamette Valley System (WVS), and the Tribe appreciates those opportunities. Grand Ronde is made up of more than 30 antecedent tribes and bands with homelands in western Oregon, southwest Washington, and northern California. Since time immemorial, our ancestors have fished, hunted, and managed resources in the rivers and watersheds that today are regulated and impacted by the Willamette Valley System. After signing the ratified Willamette Valley Treaty of 1855, which includes the entire area regulated by the WVS, our ancestors were forcibly removed from our homelands to the Grand Ronde Indian Reservation. Despite this removal and other hardships, our deep connections to our homelands and traditions have remained unbroken. Our people have experienced many kinds of loss over the past 200 years, one of which is the drastic decline and near-extinction of spring Chinook salmon and winter steelhead in the Upper Willamette River. We remain hopeful that diligent, informed effort can slow and eventually reverse this alarming trend, but we know that time is running out to effectively recover our native salmon populations.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michael Karnosh, Chris Mercier	CTGR	I. Native salmon runs can and should co-exist successfully with other resources, just as they did for thousands of years before dam construction. It is very unfortunate that Grand Ronde's advocacy for native salmon recovery has at times been seen as anti water quality, anti-local community, anti-recreation, or at least in conflict with these other resources. This portrayal is a tragic misinterpretation of Tribal values and positions which has led to some broad misunderstandings. This is not the Corps's doing, but it is still worth elaborating on. Hearing about the WVS in the recent past, one could easily get the overall impression that the major issue is "Salmon versus People", "Salmon versus Water Quality", "Native Salmon versus Recreation", or something along those lines. The truth is much more nuanced and much less of a zero-sum game than what is sometimes portrayed. Providing needed protection to native salmon does not have to "cost" the local community's economy, recreation, and water quality. Grand Ronde is not against recreational opportunities, economic development, or the quality of life in local communities. In addition to being a sovereign Tribal Nation, Grand Ronde is itself a local community facing challenges and seeking to be heard by state and federal agencies. The Tribe envisions thriving local communities where necessities such as drinking water meet the highest standards and where economic drivers such as recreation and tourism are allowed to grow. The Tribe also envisions our sacred salmon returning in the numbers they once existed in the North Santiam, South Santiam, McKenzie, Middle Fork, and other parts of the Willamette River Basin. These are not, and should not be made out to be, mutually exclusive visions for the future. Grand Ronde has been very vocal and forthcoming about its desire to work together in partnership with the communities of the Willamette River Basin. We reiterate that desire here. It is our hope that together we can find solutions that benefit all resources and communities.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michael Karnosh, Chris Mercier	CTGR	II. Neglecting to perform a dam-by-dam hydroelectric authorization removal analysis amounts to a missed opportunity by the Corps; this must be corrected. Rather than conduct a dam-by-dam analysis of whole or partial hydropower removal, as properly directed by the WRDA 22 and WRDA 24 Acts of Congress and as urged by multiple Cooperating Agencies in their verbal and written comments, the Corps decided to interpret Congressional intent as narrowly as possible in the draft SEIS. The result is Alternative 6, a one-size-fits-all action replacing all hydroelectric turbines with costly and salmon lethal cone valves. This is a missed opportunity for several reasons. First, it does not make the need for a robust hydropower deauthorization study simply go away; if anything it raises stronger concerns about why the Corps is so reluctant to take a more thorough look at the federal Willamette Valley hydrosystem that is projected to lose a staggering $939 million over the next 30 years. Dam-by dam hydropower deauthorization scenarios are needed, if for no other reason than to remedy this projected loss of public funds. Second, it fails to meaningfully evaluate whether altered hydroelectric operations at reservoirs could relatively benefit salmonid species listed under the Endangered Species Act, which was an explicit purpose of the study ordered through WRDA 22 and the intent behind the alternative ordered through WRDA 24. It does not take a licensed civil engineer or a practicing fish biologist to understand that plugging gigantic cone valves into all hydropower penstocks would cost a lot of money and kill a lot of fish. Such an obviously harmful, wasteful alternative goes against stated Congressional intent in better understanding the complex, multifaceted, multiproject Willamette Valley System and the possibilities of altering WVS configurations to benefit fish and wildlife among other resources.	USACE relied on the plain language of Section 1326 of WRDA 2024, scoping comments, and information USACE had prepared over the years for WRDA provisions not related to the NEPA process to inform Alternative 6. In WRDA 24, Congress directed USACE to analyze "an" alternative that "ceases hydropower operations" at the projects. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. The plain meaning of the Act did not require USACE to analyze numerous additional alternatives when it has already developed a reasonable range as part of the original EIS. Appendix A of the SEIS includes a dam by dam evaluation of non-hydropower measures developed for Alternatives 6 (Appendix A, Chapter 2.6). The SEIS assessed the measures for ceasing federal hydropower operations at each dam (SEIS Chapter 2.8.5; SEIS Table 23) and incorporated by reference Measure 304: Augment Instream Flows by Using the Power Pool. USACE analyzed numerous volitional passage operations dam by dam in Alternatives 2a, 2b, 5, 6, and in particular Alternatives 3a and 3b. For example, Alternative 5 analyzes a volitional passage operation via an outlet that would eliminate USACE's ability to carry out irrigation, navigation, water quality, and water supply for all but one day in the 84-year period of record. USACE looked at the operational flexibility ceasing hydropower operations would provide including using the hydropower pool for other purposes or not storing water in the hydropower pool. USACE realized removing the hydropower pool provides limited operational flexibility because it is much smaller than the conservation pool for fish and wildlife, irrigation, and other purposes. (SEIS Section 1.11.2.2 Operational Considerations for Hydropower describes the sizes of the pools at hydropower projects.)For example, not filling the hydropower pool at Detroit Dam but continuing to store for other authorized purposes, specifically irrigation and municipal and industrial water supply, meant the top of the pool would rest just below the spillway, a successful route for fish passage in the summer, but still well above the 25-50 feet the species need to find the next available outlet.
Michael Karnosh, Chris Mercier	CTGR	Third, it means that going forward under the WVS Biological Opinion issued in 2024, the framework under which solutions will likely be evaluated will be full hydropower authorization, since Alternative 5 remains the preferred alternative. This means that minimum hydropower pools will need to be observed at the eight projects generating hydropower. Instead of extra flexibility to explore operational solutions that could be both more beneficial to salmon and more efficient economically, there will be less flexibility. Grand Ronde understands that the Corps has acted under its official interpretation and guidance in developing Alternative 6. The Tribe also understands that, to conduct a sufficiently thorough dam-by-dam analysis, the Corps will need much more funding than the amounts Congress has appropriated so far. We continue to advocate for good faith exploration and evaluation of structural/operational changes that make sense for both salmonid recovery and the system as a whole; in other words, a funded dam-by-dam authorized purpose analysis with inclusion of Cooperating Agencies is required.	As stated in Chapter 5 the Corps does not have to select the preferred alternative. Rather if an agency has a preferred alternative, it must disclose that in the Draft SEIS. The SEIS assessed measures for ceasing federal hydropower operations at each dam (SEIS Chapter 2.8.5; SEIS Table 23), drawdown operations that release all the water stored for hydropower to pass fish downstream, and use of the water stored in the power pool to augment down stream flows Measure 304: Augment Instream Flows by Using the Power Pool. We agree that a broader study like a planning feasibility study, that is designed to broadly investigate how to operate federal projects and make a recommendation to Congress, would be more appropriate for analyzing operations that would abandon multiple purposes at a project or a several projects. The purpose of this document was legal compliance for the operations and maintenance of an existing system that has been authorized by Congress. If funded for a broader study, we would ensure the Grand Ronde Tribe and other cooperating agencies informed its development and analysis.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michael Karnosh, Chris Mercier	CTGR	III. In the absence of structural solutions to the lack of fish passage, operational solutions are necessary. The Tribe supports December drawdown operations at reservoirs, provided that effective flexibility (adaptive management) is in place. Chapter 3 of the SEIS addresses the proposed drawdown operation at Detroit Reservoir. Grand Ronde appreciates the attention the local communities have drawn to this topic, as well as the information the Corps has presented at its public meetings. Deep drawdowns are an effective and important operational measure for passage of outmigrating juvenile salmonids in reservoirs, given that the WVS projects do not currently include surface collectors or other structural passage features. Fall drawdowns can be successfully done with limited impact to water quality and fall fishing, and with a much-needed boost to downstream native salmon passage. The Corps's commendable performance of the Fall 2025 drawdown at Green Peter Reservoir has shown this. Spring Chinook salmon and winter steelhead in the Upper Willamette River remain at high risk of extinction; the fact that some recent years' runs do not even amount to one-half of one percent of their historic numbers, shows that time is rapidly running out. Given that any other type of dam retrofit or alteration will likely have a much longer timeframe than the 3 to 5 years it will take to know the outcomes of deep drawdown, for the survival of listed native salmon the continuation of fall deep drawdown operations has the greatest chance of success. Operational flexibility through careful monitoring, evaluation, and adaptation will be needed, of course, but for near-term survival there is no better option. The Corps's Flood Risk Management Mission Statement concludes with the words" ... and improve the natural environment"; we are committed to helping the Corps achieve that mission. We remain hopeful that through informed, frequent discussions and updates, a willingness to initiate on-the-ground solutions, effective monitoring of those solutions, and adaptive management, we will expedite the most effective path forward to full salmon recovery. We look forward to joining you and your staff on the Willamette Action Teams for Ecosystem Recovery (WATER) and in other forums.	Thank you for your comments and your participation in the NEPA process as a cooperating agency. They will be taken under consideration.
Christopher Lish	Independent Citizen	I strongly support actions proposed in the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Willamette Valley System that meaningfully improve conditions for wild, native salmon and steelhead in the Willamette River Basin. I specifically support the annual fall deep drawdown at Detroit Reservoir, and I urge the Corps to strengthen and expand the alternatives it considers in the SEIS. “A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise.” -- Aldo Leopold	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Christopher Lish	Independent Citizen	Support for the Deep Drawdown at Detroit Reservoir I strongly support the Corps' proposal to draw down Detroit Reservoir each fall to improve downstream passage for juvenile fish. This is one of the most effective operational tools available to help spring Chinook and winter steelhead survive their migration to the ocean. The Corps' proposed three-year phased approach to gradually deepen the drawdown is a smart, science-based strategy to reduce downstream sediment and water-quality impacts. Please continue prioritizing this measure, refine it with the best available science, and ensure it becomes a consistent annual practice.	Thank you for your comments. They will be taken under consideration.
Christopher Lish	Independent Citizen	The Corps' Alternative 6 Falls Short of What Congress Intended By analyzing only one "no-hydropower" alternative, the Corps has limited the public's ability to understand what's truly possible for fish recovery. Alternative 6 removes all hydropower infrastructure but keeps the same costly and likely ineffective fish-collection facilities from the preferred alternative. This does not reflect the full range of options Congress expected when it required the Corps to study ending commercial hydropower in the Willamette system. What's missing is a dam-by-dam analysis of other viable approaches—such as leaving hydropower infrastructure in place but no longer generating commercial power. Without these options, decision-makers and the public don't have the information needed to choose a plan that will actually help native fish recover.	Congress passed a provision in WRDA 24 that required USACE to formally analyze "an alternative" that ceases hydropower operations at the WVS projects. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. Appendix A of the SEIS includes a dam by dam evaluation of non-hydropower measures developed for Alternatives 6 (Appendix A, Chapter 2.6). The SEIS assessed the measures for ceasing federal hydropower operations at each dam (SEIS Chapter 2.8.5; SEIS Table 23) and the Final EIS analyzed Measure 304: Augment Instream Flows by Using the Power Pool dam by dam across all seven action alternatives.
Christopher Lish	Independent Citizen	Expand the Analysis of What Is Possible Without Commercial Hydropower The Draft SEIS does not fully examine the range of options that become available if commercial hydropower is removed from Willamette Valley dams. Since Congress has required the Corps to analyze a "no hydropower" alternative, the final SEIS should explore more than one narrow version. Please expand the "no hydropower" analysis to consider the full suite of fish-focused options, including: -More flexible and seasonally variable drawdown schedules -Additional deep-drawdown opportunities at other reservoirs -A wider range of flow and temperature management strategies -Removal or alternative operations like run of river of reregulating dams, which exist solely to support hydropower production and impede fish recovery	Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. Appendix A of the SEIS includes a dam by dam evaluation of non-hydropower measures developed for Alternatives 6 (Appendix A, Chapter 2.6). USACE proposed drawdowns at several reservoirs in the action alternatives. All alternatives, except Alternative 4, include Measures 40 and 720, which are fall and spring drawdown operations, respectively (FEIS Tables 2.10-7 through 2.10-13 incorporated into the SEIS by reference).

Commenter Name	Commenter Affiliation	Comment	USACE Response
Christopher Lish	Independent Citizen	Exploring these alternatives is essential for meeting Endangered Species Act obligations and reducing the long-term need for expensive and ineffective fish-collection facilities. The SEIS should evaluate all reasonable actions that could help restore native fish populations—not just those that fit within traditional operational constraints. A broader range of alternatives will give the public, the resource agencies, and Tribal governments a clearer sense of what dam operations could look like if fish recovery were the central goal. “The ultimate test of a moral society is the kind of world that it leaves to its children.” -- Dietrich Bonhoeffer Thank you for considering these comments. I urge the Corps to produce a Final SEIS that fully explores the options needed to recover wild salmon and steelhead while moving toward a more resilient and ecologically healthy Willamette River Basin.	A reasonable range of nine alternatives were analyzed in the SEIS. The alternatives included many operations that would not fit within the traditional operational constraints in Alternatives 2B, 5, 6 and especially 3A and 3B. The operations did not perform as well as structural passage in facilitating downstream passage for juvenile listed species. They also had adverse impacts to water quality and water supply.
Jason Pulley	City of Salem	This letter and the attached memorandum provide comments from the City of Salem (City) to the US Army Corps of Engineers (USA CE) 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.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	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 sandfilters 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.	The SEIS was updated to identify the potential impacts to the City of Salem facility (Section 3.19.4.1 Turbidity). The SEIS analyzed impacts water supply and turbidity. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit based on model results. The impact is low because the drawdown would occur during the late fall and early winter during the season with the largest amount of precipitation. The drawdown operation would end about one month before the normal refill season would begin, meaning that USACE will have an entire month to regain the 55ft in elevation which can happen as quickly as in a few days. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill. The model results in the SEIS also do not reflect how real-time water management can help to minimize impacts to reservoir elevations. USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	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. 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.	USACE cannot speak for NMFS or what it considered in preparing the BiOp. The SEIS analyzes numerous operations at various locations throughout the WVS in alternatives 2A,2B,3A, 3B, 5, and 6, with alternatives 3A and 3B focusing on operational passaged. The SEIS assessed the water quality impacts of the operations in these alternatives. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS.
Jason Pulley	City of Salem	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?	USACE assessed the elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. Turbidity has reduced varying amounts each subsequent year when a drawdown to the same elevation occurs until it reaches a new equilibrium. The amount is dependent on several factors like sediment type, remaining pool size, and precipitation. USACE developed an Emergency Response and Communications Plan and would coordinate with North Santiam communities to include them in this plan. This effort is separate from the SEIS process.
Jason Pulley	City of Salem	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.	USACE developed an Emergency Response and Communications Plan and would coordinate with North Santiam communities to include them in this plan. This effort is separate from the SEIS process. USACE would use real-time hydrology and turbidity data to modify the operation to improve conditions for fish and reduce adverse impacts.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	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.	The Detroit drawdown is included in the 2024 *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* under the authority provided to the National Marine Fisheries Service by the Endangered Species Act. The USACE requested to delay the drawdown in 2025 until it could conduct the necessary NEPA analysis on the drawdown. The NEPA process and public input has shaped the drawdown operation in a way that will minimize downstream impacts. The Biological Opinion requires the deeper drawdown of Detroit Reservoir every fall/winter until a different fish passage solution is in place.
Jason Pulley	City of Salem	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 Bi Op). 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.	USACE developed an Emergency Response and Communications Plan that will detail how considerations like those listed in the comment will be considered during implementation if the operation is selected. USACE and the State of Oregon would coordinate each year with North Santiam communities. This effort would be separate from the SEIS process. USACE would use real-time hydrology and turbidity data to modify the operation to improve conditions for fish and reduce adverse impact.. The implementation timeline in the Biological Opinion is different from the analysis in the EIS because the EIS was focused on comparing the effects of the different long-term measures and their tradeoffs. To do this an assumption for the timing of implementation was made across all the alternatives. The ESA consultation process which is informed by the SEIS is a separate analysis with separate legal standards and compliance requirements so no changes to the document are required based on this comment.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	In summary, and for the reasons stated, the City has no choice but to stand in opposition to the deep draw down 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 longstanding 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.	Thank you for your comments. They will be taken under consideration.
Jason Pulley	City of Salem	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 draw downs) 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.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	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 ("CW A"), 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 ("BSA"). USACE 's drastic proposal is the result of the agency's own repeated failure to comply with the BSA 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 draw down in the context of NEPA, the CWA, and the SDWA.	The proposed Detroit Reservoir drawdown is a legal requirement under the Endangered Species Act (ESA). The National Marine Fisheries Service determined in their 2024 Biological Opinion that action is required to improve passage and access to habitat above Detroit Reservoir to avoid causing irreversible harm to threatened salmon and steelhead populations, until the long-term proposed plan for a structural downstream fish passage system at Detroit Dam is funded and completed, which would trap the juveniles and smolts and truck or bypass them below Big Cliff Dam. A phased, gradual implementation of the proposed deeper drawdown of Detroit with constant water quality monitoring would reduce the risk of releasing high turbidity water downstream. A late-fall drawdown schedule would also help reduce impacts on both the kokanee fishery and the peak summer recreation season, thereby reducing economic disruption.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	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 N ephelometric Turbidity Units ("NTU") is necessary. An engineering evaluation and literature review concluded that sustained turbidity greater than 10 NTU in the feed water 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.	USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur.

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Jason Pulley	City of Salem	To quantify the impacts of the proposed deep draw down 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 feed water 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 notmal 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.	USACE updated Section 3.19 of the SEIS to expound upon the on effects to the North Santiam drinking water facilities from the drawdown. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from newly exposed reservoir beds. USACE assessed the sediment data patterns from past drawdowns and determined a step-down approach would expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur.

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Jason Pulley	City of Salem	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 nonnal 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.	The SEIS analyzed impacts water supply and turbidity. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit based on model results. The impact is low because the drawdown would occur during the late fall and early winter during the season with the largest amount of precipitation. The drawdown operation would end about one month before the normal refill season would begin, meaning that USACE will have an entire month to regain the 55ft in elevation which can happen as quickly as in a few days. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill. The model results in the SEIS also do not reflect how real-time water management can help to minimize impacts to reservoir elevations but the ability to help minimize impacts in real time is described.

Jason Pulley	City of Salem	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 draw downs 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 draw down 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 draw down, potentially up to a sustained value of 200 NTU based on regional case studies of similar events. • As a result of the proposed draw down, 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 draw downs. • 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 draw down. 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	USACE updated the SEIS to identify the potential impacts to the City of Salem facility (SEIS Section 3.19.4.1 Turbidity).

Commenter Name	Commenter Affiliation	Comment	USACE Response
		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.	
Jason Pulley	City of Salem	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. 7 3 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 feed water particles were primarily composed of colloidal clay particles. Elevated filter outlet turbidity can be correlated to decreased cyst and bacteria removal across the filters (A WW ARF, 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.	USACE updated the SEIS to identify the potential impacts to the City of Salem facility (SEIS Section 3.19.4.1 Turbidity). Impacts to water quality from operations are in described in Section 3.5 of the SEIS.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	e. Case Studies of Deep Draw down 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 draw downs of the Green Peter Dam have occured 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.	Thank you for your comments. They will be taken under consideration.
Jason Pulley	City of Salem	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 draw down 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.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	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 ("RP As") 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 RP A that it believes would avoid jeopardizing the continued existence for those species and avoid impacts to their habitat. The RP A 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 sub basins. • 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 draw down 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 BSA, 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 BSA. 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.	USACE cannot speak for NMFS or what it considered in preparing the BiOp. The SEIS analyzes numerous operations at various locations throughout the WVS in alternatives 2A,2B,3A, 3B, 5, and 6, with alternatives 3A and 3B focusing on operational passaged. The SEIS assessed the water quality impacts of the operations in these alternatives in Section 3.5 and 3.19. USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts that may occur. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	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, NMFS (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.	The SEIS analyzes, in detail, a reasonable range of nine alternatives. Chapter 3 contains a detailed analysis of water quality impacts for all nine alternatives including the fall fish passage operation at Detroit Dam. The ESA Section 7 consultation process, which was informed by the SEIS, is separate legal process from NEPA and this SEIS prepared to comply with NEPA. No changes to the SEIS are required to address this comment.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	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. 3 3 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 CW A. 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. USA CE and NMFS cannot ignore the CW A 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'! 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).	Thank you for your comments. They will be taken under consideration.

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Jason Pulley	City of Salem	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 Prat. 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-l(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-l(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 modem society, when we tum 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.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	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 draw down 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.	USACE updated the SEIS to identify the potential impacts to the drinking water facilities downstream of Detroit (SEIS Section 3.19.4.1 Turbidity). Impacts to water quality from operations are in described in Section 3.5 of the SEIS. Providing detailed legal positions for how USACE complied with other laws like the SDWA and CWA is not required under NEPA. USACE Chapter 7 and the Record of Decision describe USACE's compliance with applicable laws.
Jason Pulley	City of Salem	The purpose of this letter and its supporting attachment is to provide comments from the City of Salem (City) regarding the Willamette Valley System Operations and Maintenance Draft Supplemental Environmental Impact Statement (Draft SEIS) that was issued by the U.S. Army Corps of Engineers (USACE) in November 2025. The Draft SEIS fulfills two directives contained in the 2024 Water Resources Development Act: (1) It identifies options to permanently end federal hydropower production at eight Willamette Valley Dams; and (2) It evaluates options to comply with the Biological Opinion (BiOp) by the National Marine Fisheries Service (NMFS) regarding annual deep drawdowns of Detroit Reservoir. The City's comments are specific to the deep drawdowns, in which the level of Detroit Reservoir is proposed to be dropped to a historically low elevation each year to facilitate the outmigration of threatened fish species.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	First and foremost, the City continues to support the actions of the USACE, NMFS, and other federal, state, and local agencies intended to enhance habitats and support out-migration of 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 members of the Tribal Nations. Finally, the City acknowledges and appreciates that the Draft SEIS addresses many of the concerns we have expressed to the USACE over the past 12 months. Among the significant commitments made by the USACE in the Draft SEIS that are responsive to our concerns: (1) The USACE will "initiate the drawdown closer to late November or early December" (Page 18). (2) The deep drawdown will be conducted "in a stepwise manner" (Pages ES-9, 210). (3) The duration of the deep drawdown "is set to last for two weeks" (Page 18). (4) The incremental deep drawdown approach "would span over three years" (Page 90). However, the City remains deeply concerned at the absence in the Draft SEIS of any reference to turbidity triggers and accompanying action measures. As described and justified in our comments below and in our previous comments (see Attachment), these two important operational factors must be incorporated into the Final SEIS.	The SEIS has been modified to reflect a change to the proposed operation denoted in the comment as (4) The incremental deep drawdown approach "would span over three years" (Page 90). Instead USACE would use real-time hydrology and turbidity data to modify, pause or cease the operation in any given year to improve conditions for fish and reduce adverse impacts. The drawdown elevation could be reduced based on unacceptable turbidity levels meaning it could take longer than 3 years to reach the elevation. Determining the appropriate level of turbidity is informed by yearly coordination with State agencies and drinking water facilitates via Emergency Response and Communications Plan. That effort is separate from the SEIS process. The SEIS analyzed the effects of reaching the final elevation of 1395 feet, as required by the 2024 BiOp, including the adverse impacts to water quality and water supply, and disclosed those reasonably foreseeable impacts. The analysis also acknowledges that the design of the operations and real time adaptive management may lessen those impacts in any given year.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	Key Recommendation: Establish a Turbidity Trigger of 10 NTU/12 hours to Cease the Drawdown It is critical that the USACE adopt a turbidity trigger which, if exceeded over a specified period of time, will cause the immediate cessation of drawdown operations and the resultant return of Detroit Dam and Detroit Reservoir to normal operating conditions. The purpose of the turbidity trigger is to protect human health, protect the City's water treatment system, and protect the City's customers. Once drawdown operations cease, it is anticipated that turbidity levels in the river will decrease over time and normal operations at the City's water treatment plant will be able to resume. Further, to provide time to restore normal operations and to evaluate lessons learned, once the turbidity trigger has been exceeded, drawdown operations should not resume again until the following year. This recommendation is based on years of operational experience coupled with scientific research conducted over the past 12 months. Additionally, a turbidity trigger should be the minimum safeguard for downstream water users to protect from reasonably foreseeable environmental effects of the proposed action. The Thomas R. Carper Water Resources Development Act of 2024 (WRDA 2024) required that the Corps complete a report on instances in which turbidity concerns have arisen following a drawdown at a reservoir in the Willamette Valley, including "identify(ing) lessons learned associated with turbidity resulting from drawdowns and … how changes based on those lessons learned are being implemented." Absent completion of the report, the Corps should proceed with the drawdown of Detroit Reservoir under strict guidelines for downstream water quality while data is being collected and analyzed from similar operations in the Willamette Valley. Given that the Corps failed to analyze specific turbidity level effects from the proposed action on downstream users, a strict turbidity trigger that protects downstream users is a reasonably prudent alternative. The specific recommendation is that the turbidity trigger should be set at a reading of 10 NTU***1*** or above, experienced over a period of 12 consecutive hours, as measured at the United States Geological Survey's (USGS) Niagara gauge. (USGS-14181500). ***1*** *Nephelometric Turbidity Units (NTU) and Formazine Nephelometric Units (FNU) are measures of the clarity of the water. The City typically reports turbidity levels in NTU; the USACE typically reports turbidity levels in FNU. Although the two units reflect the same characteristics, the analytical methods used to determine FNU and NTU are different and the two are not numerically interchangeable. Generally, water with turbidity of 10 NTU or 10 FNU or less looks clear. Water with turbidity of 50 NTU or 50 FNU looks cloudy; water with turbidity exceeding 500 NTU or 500 FNU looks muddy.*	Thank you for your comments. They will be taken under consideration in development of the Emergency Response and Communications Plan.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	ADDITIONAL BACKGROUND INFORMATION. The City's Responsibilities as Regional Water Provider The City is the only regional water provider in the Mid-Willamette Valley. We are responsible for supplying safe and reliable drinking water to approximately 220,000 individuals and thousands of properties 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 48,000 citizens of the cities of Stayton and Keizer should either, or both, municipalities suffer impairment to their own drinking water systems.	Thank you for your comments. They will be taken under consideration.
Jason Pulley	City of Salem	High Turbidity Endangers Treatment System, Places Customers at Risk, Limits Future Growth At issue is the fact that the deep drawdown of Detroit Reservoir will increase the presence of fine particles in the North Santiam River, the source of drinking water for the region served by the City. These particles pose a significant risk to the City's slow sand filtration treatment system that is located on Geren Island on the North Santiam River near downtown Stayton. Highly turbid water, if allowed into our treatment system, will clog the sand filters. Run times between filter maintenance periods will be significantly reduced, the cost and time to recondition each filter will substantially increase, and drinking water production from our treatment plant will be considerably diminished. If, to protect the sand filters, the City closes the intake gates from the North Santiam River, our ongoing ability to meet water demand will depend solely on the amount of water stored in reservoirs, water drawn from a handful of wells, and water provided through interties with the City of Keizer. At this writing, the City has embarked on substantial capital investments, expected to cost approximately $8 million, to prepare for potential disturbances caused by the drawdown. These improvements are not yet complete. With these significant investments, the City believes we can meet winter demand during the 2026 deep drawdown but there is no assurance that we will be able to meet future demands, which are expected to grow higher with each passing year. Further, under this mode of operation there is limited redundancy in the system. Should a critical component of one or more of these alternative sources of drinking water fail, our ability to supply water may fall below the demand of our many customers. Depending on the severity and duration of the shortfall, the consequences range from temporary inconvenience to untenable and unsustainable risks to life, property, and livelihood. In addition to limited potentially life-saving redundancy, operating a regional water supply system at or near capacity with no back-up will also create a significant and highly consequential condition – it could limit opportunities for future growth. Economic growth invariably relies on a region's ability to reliably provide essential services, water being the most critical of these. No housing deficiency can be addressed if there is insufficient water for new residential development. No new businesses, small or large, will locate in our service area if our ability to provide drinking water is questionable. No water-dependent industry seeking a new location will select Salem if we cannot provide assurances of reliable, year-round water for its production.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	How the City Treats Water under Normal Turbidity Conditions Under normal operating conditions, the City draws raw water from the North Santiam River through intake gates at our facility on Geren Island. This water is treated using slow sand filtration, a highly reliable, time-tested method for producing drinking water. For sand filters to properly operate, the intake water must have very low levels of turbidity. Typically, the water drawn from the North Santiam River has a turbidity level of less than 10 NTU. At this level, our sand filters can operate for about three months before the filter must be taken offline for cleaning (scraping 0.25 to 0.5 inches from the top layer of sand) and reconditioning (allowing a biological layer of microorganisms to regrow on the surface of the sand).	USACE updated the SEIS to identify the potential impacts to the drinking water facilities downstream of Detroit (SEIS Section 3.19.4.1 Turbidity). Impacts on water quality from operations are in described in Section 3.5 of the SEIS.
Jason Pulley	City of Salem	How the City Treats Water under Elevated Turbidity Conditions There are naturally occurring, short-term periods during which the turbidity levels in the North Santiam River increase well above 10 NTU. High turbidity is typically caused by storm events, which increase runoff volumes and sediment transport from up-river creeks and streams. The City's operational procedure in anticipation of high turbidity in the river involves filling the slow sand filters to their maximum capacity prior to the arrival of high turbidity and then closing the intake gates. With the gates shut, the filters can operate for about three days until low water levels in the filters required them to be taken offline. Historically, high turbidity levels triggered by storm events have lasted less than three days.	USACE updated the SEIS to identify the potential impacts to the drinking water facilities downstream of Detroit (SEIS Section 3.19.4.1 Turbidity). Impacts on water quality from operations are in described in Section 3.5 of the SEIS.
Jason Pulley	City of Salem	Results of Research on the Consequences of High Turbidity There is little question that the deep drawdown will elevate turbidity levels in the North Santiam River, both during the initial drawdown, during subsequent drawdowns, and for a significant period of time after each drawdown operation has ended. As stated earlier, typical turbidity levels in the North Santiam River at our intake gates is less than 10 NTU. Of concern is information collected by the USACE during initial drawdowns in 2023 impacting the South Santiam River. Data provided by the USACE showed turbidity levels ranging from roughly 50 FNU (see footnote on Page 2) to over 450 FNU. Data from the most recent drawdown conducted in 2025 indicate sustained turbidity levels had decreased but still ranged between approximately 20 and 80 FNU. The adverse impacts of sustained elevated levels of turbidity in the City's intake from the North Santiam River are summarized below.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	1. Short-term Impacts to Our Filters The City conducted extensive research in 2025 to determine the risks of keeping the intake gates open and allowing highly turbid surface water into a slow sand filtration system. Based on this bench-scale scientific testing, we now know that turbidity levels as low as 50 NTU will reduce the runtime of a slow sand filter from approximately three months to three weeks. Higher turbidity levels will result in even lower runtimes, some of which are less than 24 hours. Additionally, fine particles from highly turbid intake water can penetrate deep into a sand filter, essentially fouling the entire depth of the sand bed well beyond the typical 0.25-0.5 top inches. This will significantly increase the cost and complexity of reconditioning a filter and measurably reduce the life cycle of a filter from four years to less than two months. Restoring a filter to full operational status once the filter has been terminally fouled can require up to six months to drain the water, remove the clogged layer of sand, procure and then replace the bed with new sand, and restore the biological layer in the rebuilt filter bed. The time required to return a filter from failure to full operational status is expected to extend beyond winter drawdown and into the summer months, a period during which water demand will be at its highest. The estimated cost to replace a filter bed ranges between $3 million and $4 million each. The City will have no choice but to pass this cost burden to our customers in the form of rate increases.	USACE updated the SEIS to identify the potential impacts to the City of Salem facility (SEIS Section 3.19.4.1 Turbidity). USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.
Jason Pulley	City of Salem	2. The Longer-term and Recurring Impacts The adverse impacts of highly turbid water entering the City's sand filtration system extend well beyond the immediate period of the deep drawdown. Rehabilitating filters lost to sustained turbidity is a labor-intensive and expensive endeavor. There are long-term consequences related to increases in operating and capital budgets which will drive utility rates higher. There are challenges related to limited staffing, uncertainty in supply chains and procurement, and indeterminate planning timelines. The time required to restore filters to full operation may extend into the spring and summer months, a period during which water demand is at its highest. Among the potential consequences is the real possibility of compromising the City's ability to meet peak summer demands while, concurrently, adversely impacting the City's ability to prepare for the next deep drawdown later in the same year.	USACE updated the SEIS to identify the potential impacts to the City of Salem facility (SEIS Section 3.19.4.1 Turbidity).

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	3. Risks of Total Reliance on Alternative Water Sources If the intake gates remain shut because of high turbidity in the river, or if the sand filters are offline for cleaning and reconditioning post-drawdown, the City must rely on water drawn from groundwater wells, water stored in our reservoirs, and water provided via an intertie with the City of Keizer. Depending on the time of year, the duration of the high turbidity, and the time needed to restore operations of slow sand filter(s), these alternate sources may not be able to meet the demand of our water customers. We estimate that existing alternative water sources – wells, reservoirs, and interties – will meet the projected water demand during the timeframe of the first proposed drawdown. However – and this is a significant consideration – under this mode of operation there is limited 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, creating an unacceptable risk to human health and safety.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	Advantages of Implementing Turbidity Triggers and Action Measure Among the advantages to having turbidity triggers. Frames Intergovernmental Collaboration Including this turbidity trigger level and action measure in the Final SEIS will require the City and USACE engage in follow-up conversations to establish details such as: communication protocols, pre-approved authorities for implementation of action steps, reporting requirements, and specific details regarding the immediate and follow on measures to be taken. Facilitates Compliance with the Federal Clean Water Act Adopting turbidity triggers would also allow USACE to reconcile the proposed drawdown action with potential violations of the federal Clean Water Act (CWA). The CWA addresses, among many other things, contaminants in water resources. There is no doubt that causing high levels of turbidity should be considered a violation of the CWA. Water quality sampling data show that typical turbidity levels at the City's intake from the North Santiam River are well below 10 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 turbidity levels reported by the USACE during drawdown operations on the South Santiam River clearly violated federally approved state water quality standards. There is little doubt that turbidity levels in the North Santiam River during the deep drawdown will rise above "natural stream turbidities" by more than 10 percent. From a regulator perspective, once a violation in water quality standards has occurred, among the correction actions is to cease the activity causing the violation. The Oregon Department of Environmental Quality may consider a turbidity trigger and corrective action to stop the drawdown as appropriate measures which will allow the USACE to avoid liability related to violations of state and federal law. Supports Compliance with the Federal Safe Drinking Water Act Adopting turbidity triggers would also allow USACE to reconcile the proposed drawdown action with potential violations of the federal Safe Drinking Water Act (SDWA). The Safe Drinking Water Act (SDWA) requires persons to protect public water systems. The Draft SEIS does little to address potential violations of the SDWA. The proposed drawdown is expected to 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 SDWA.	USACE will use real-time hydrology and turbidity data each year to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts. USACE updated the SEIS to identify the potential impacts to the drinking water facilities downstream of Detroit (SEIS Section 3.19.4.1 Turbidity). Impacts to water quality from operations are in described in Section 3.5 of the SEIS. Responding to comments does not require USACE to provide detailed legal positions for how USACE complied with other laws like the SDWA and CWA. USACE Chapter 7 and the Record of Decision generally describe USACE's compliance with applicable laws. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	SUMMARY OF RECOMMENDATIONS AND CONCLUSION Six Recommendations While there is much to be commended in the Draft SEIS, the City presents to the USACE six specific recommendations for incorporation into the Final SEIS. Recommendation #1: Acknowledge the Significance of Increased Turbidity The City disputes that the proposed drawdown of Detroit Reservoir, even following a stepwise approach, would cause only a "moderate increase in sediment and turbidity levels" in the North Santiam River (see Page ES-9). The word "moderate" is subjective and situational. Based on our best professional judgement, which is now backed up by extensive research and bench-scale testing, levels of turbidity as low as 50 NTU – a measure potentially viewed as "moderate" by some – will have significant and sustained consequences to our treatment systems. For the Final SEIS, a more accurate sentence would read: For water quality and drinking water, the deeper drawdown of Detroit Reservoir would cause a moderate an increase in sediment and turbidity levels downstream of Detroit Reservoir during the operation. This increase will threaten the operation of the slow sand filtration systems operated by the City of Salem and the City of Stayton.	USACE updated the SEIS to discuss impacts to slow sand filtration systems (SEIS Section 3.19.4.1 Turbidity). The methodology for how the determination is made as to the degree of an effect is disclosed in Chapter 3 and associated Appendix C. This methodology is consistently applied to all alternatives and is based on the level of turbidity in the water not its indirect effect on a particular water system as all systems are different.
Jason Pulley	City of Salem	Recommendation #2: Establish the Need for a Turbidity Trigger and USACE Response A stepped approach alone is insufficient to protect human health and safety for communities relying on the North Santiam River for drinking water, firefighting, industrial production, and commercial purposes. The USACE must adopt in the Final SEIS a clear turbidity trigger consisting of a NTU level that, if exceeded over a specific period of time, will require cessation of the drawdown operation. A turbidity trigger with mandated actions will provide a degree of certainty and significantly enhance the City's ability to develop contingency and recovery plans. This recommendation comes with a commitment by the City to work with the USACE and to share information, data, and research results to help support a turbidity trigger that protects public health, lowers risks, supports long-term objectives of the drawdown, and reflects current scientific research and sound engineering practices.	The reasonably foreseeable effects of the operations are disclosed in Chapter 3. These effects will be further reduced by using real time data to modify, pause, or cease the drawdown based on turbidity levels. The request for triggers will be taken under consideration in development of the Emergency Response and Communications Plan and will be developed with state Agencies and the City of Salem. This will be developed separate from the NEPA process.
Jason Pulley	City of Salem	Recommendation #3: Establish a Turbidity Trigger of 10 NTU over 12 Hours to Cease Operations The City's specific recommendation, which is consistent with multiple conversations with the USACE and supported by scientific research, is that a firm turbidity trigger of 10 NTU should be established in the Final SEIS. Based on the anticipated variability of turbidity in the North Santiam River during the drawdown, the City further recommends that a time duration of 12 hours be incorporated as part of the trigger. Once this trigger is reached, the USACE should cease all drawdown activities for that year and allow the City's water treatment system to recover and resume full operation. Based on the studies and research conducted, the City strongly recommends that the USACE establish in the Final SEIS a turbidity trigger as follows: The USACE will immediately take steps to cease the deep drawdown operation and restore Detroit Dam and Detroit Reservoir to normal operations the moment turbidity levels in the North Santiam River, as measured at the USGS Niagara gauge, have been at or above 10 NTU for 12 consecutive hours.	Thank you for your comments. They will be taken under consideration in development of the Emergency Response and Communications Plan.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	Recommendation #4: Evaluate Merits of Delaying Implementation The Final 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 develop and test wells currently under construction to determine if they have sufficient yield to provide resiliency and mitigate risks to life, property, and livelihood.	USACE recognizes the immediate impacts are a serious concern, including potential adverse effects to drinking water facilities downstream of Detroit Dam. The proposed drawdown is a direct response to our legal obligations under the Endangered Species Act (ESA). The North Santiam River's spring Chinook salmon and winter steelhead are listed as threatened, and the dams currently block their access to essential spawning habitat. Federal wildlife agencies have determined that continuing to operate the dams without providing fish passage risks the extinction of these species. Therefore, to comply with the ESA, action is required to provide passage for these fish. Doing the drawdown sooner, allows the USACE to shape the operation and work with downstream communities, rather than being directed by the Court.
Jason Pulley	City of Salem	Recommendation #5: Focus on a Long-term Strategy of Implementing Structural Solutions Our read of the BiOp, the Final Programmatic Environmental Impact Statement***2***, the Draft SEIS, and various reports and evaluations, is that the long-term strategy does not focus on year over year deep drawdowns. However, the long-term strategy requires implementation of structural remedies designed to facilitate out migration of threatened species. The current Draft SEIS considers annual deep drawdowns of Detroit Reservoir as an "Interim Operation" that will occur "until the long-term solution for downstream fish passage and water temperature management at the respective location is in place and operational" (Page 17). We agree, but as written in the Draft SEIS, as implied in recent public meetings, and as demonstrated by the years that have passed since the structural solutions were first proposed, implementation of structural measures have not been a priority. The Final SEIS should clearly state the intention of the USACE to pursue all means available to secure funding, initiate project planning, and ultimately construct what is expected to be the long-term strategy to support the out-migration of threatened species. Until these measures are in place, the financial burden and highrisk scenarios are being borne not by the responsible federal agencies but by local jurisdictions and our ratepayers. ***2*** *"Willamette Valley system operations and maintenance: Final environmental impact statement." United States Army Corps of Engineers. Portland District. April 2025.*	The purpose of the SEIS document is to evaluate and disclose effects of a federal action. The Record of Decision is document that discloses the agency's decision and what actions it will take.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	Recommendation #6: Employ Adaptive Management with Each Annual Drawdown The underlying Biological Opinion for the Willamette Valley System requires development of an Adaptive Management Plan that includes “decision criteria” that guide strategies (see Section 2.5.10 of the BiOp). At issue for the City is a pressing 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 winter water demand. If the City adds a new industrial customer with a high, year-round water demand, the risks/consequences assessment must be reevaluated. (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 that year’s deep drawdown. In the context of Adaptive Management, there is the ambiguity in the Draft SEIS regarding the duration of the drawdown, which “is set to last two weeks” (Page 18) and the timespan of the incremental steps toward the ultimate desired elevation in the reservoir which “would span over three years” (Page 90). For our purposes of operational planning and risk management, the City requires assurances that the duration of the deep drawdown “is set to last will not exceed two weeks” and the incremental drawdown approach “would span over at least three years.” Further, a requirement for the USACE to conduct additional analysis, reviews, and consultation with affected parties should incorporated into the Final SEIS to provide assurances that the USACE will employ both science based and risk-based decision making during the course of adaptively managing the drawdown operations over the years.	Thank you for your comments. They will be taken under consideration in development of the Emergency Response and Communications Plan.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jason Pulley	City of Salem	Conclusion In conclusion, the City is grateful that the Draft SEIS addresses several of the concerns we have expressed over the past year in our conversations with the USACE regarding the risks each deep drawdown will present to our water treatment plant and our customers. However, the absence of any references to turbidity triggers and action measures is deeply troubling. Clear triggers and actions are essential for the City's operational and contingency planning. Establishing mutually acceptable triggers and action measures also represents the best way forward for providing assurances to our current and future regional customers that safe drinking water will continue to be reliably delivered. Lastly, turbidity triggers and action measures will facilitate the USACE's compliance with the federal Clean Water Act, federal Safe Drinking Water Act, and Oregon State Water Quality Standards, among other regulations. 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 without some kind of documented assurances that the drawdown operations will cease before the high levels of turbidity have resulted in highly consequential harm has occurred to our treatment system and our customers have been placed at risk. The City is committed to working with the USACE and others to evaluate and, ultimately, to implement measures that support downstream passage of juvenile species, protect habitat and water quality, ensure water demands are met, and provide for the many users of the North Santiam River.	The SEIS is a programmatic evaluation of effects from proposed actions. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.
Joel Myers	Independent Citizen	I am submitting six comments in regard to the proposed drawdown of Detroit Lake, which I believe have not been discussed. 1.There has not been open discussion or data released of original native populations of salmon that were able to travel above Willamette falls prior to 1885. The populations were very limited, how do they compare to today? The first augmentation occurred in 1885 and again in 1893. After these man made improvements in the Willamette falls, fish migration and populations in the main stem Willamette basin increased drastically. Without man made improvements to the Willamette falls would fish even migrate past the falls? Will the future plans to "re -wild "the Willamette Falls include removing the man- made augmentation of the falls to enhancing fish migration. Why would you spend millions more dollars on the Willamettte Basin Salmon if the "re-wilding" of the falls is going to remove the salmon's ability to travel above the Falls?	Available estimates of number of spring Chinook salmon and winter steelhead in the North Santiam just prior to construction of Detroit Dam numbered in the thousands. Prior to construction of fish ladders at Willamette Falls, these species were known to migrate up the falls during spring before river flows seasonally declined making the falls impassable. Fish ladders extended the season over which these species could pass upstream of the falls into summer. USACE is not aware of any plans to remove the fish ladders. The Endangered Species Act (ESA) requires Federal agencies to actively conserve threatened or endangered species and use their authorities to further the Act's purposes, and to ensure their actions don't jeopardize threatened or endangered species or destroy critical habitat. Actions considered here, such as the Detroit drawdown, follow the ESA.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Joel Myers	Independent Citizen	2. There has not been any discussion of utilization of off Channel habitat and spawning channels in the Willamette river system to enhance opportunities for fish. These have been very successful in British Columbia fisheries in many locations. The off channel site I have personally visited is 900 river miles from the ocean and has a successful salmon spawning population for 30 years. These off channel spawning beds should be on every salmon river in the Willamette system. Very low cost to construct, and maintain. No mention that this program has been looked at.	The proposed Detroit Reservoir drawdown is a legal requirement under the Endangered Species Act (ESA). The National Marine Fisheries Service determined in their 2024 Biological Opinion that action is required to improve passage and access to habitat above Detroit Reservoir to avoid causing irreversible harm to threatened salmon and steelhead populations, until the long-term proposed plan is funded for a structural downstream fish passage system at Detroit Dam is funded and completed which would trap the juveniles and smolts and truck or bypass them below Big Cliff Dam. The recovery plan for these fish includes providing access to higher quality historic habitat above Detroit and other WVS dams, and NMFS has prioritized doing so in their biological opinion. Factors including high summer water temperatures and high levels of hatchery origin spawners are known to contribute to pre-spawn mortality in spring Chinook holding, spawning and incubation below WVS dams.
Joel Myers	Independent Citizen	3. There has been no mention of the effect of the Salmon migration by drug pollution in river water by anti anxiety medication in urban sewage water disposal. These compounds have been shown to have a large affect on migrating young salmon. there are many urban sewage systems utilizing the Willamette system that have not been identified and tested for this potential issue. 4. In summer of 2025 the roadside herbicide spraying on Highway 22 from Gates to Marion Forks, at times the application less than 5 yards from the Santiam river,a designated salmon stream. Most noted above the city of Idahna. Few ,if any herbicides are labeled for this type of application close to running water. Made on both sides of the highway. 5.Chemical residue, leachate from tire wear. Tire wear chemical 6PPD- quinone significantly affects salmon populations. Most, if not all rivers in the Willamette Basin have major highways next to them. Resulting in possible significant leaching of 6PPD -quinone, not mentioned by Corps of Engineers. large urban rain water discharge from shopping center parking lots eventually flows to streams as well.	Chapter 3 Affected Environment of the WVS Final EIS, which is included by reference as part of the Draft SEIS includes information on pollutants from urban and agricultural sources, noting pollutants can affect migratory patterns in native fish and the effects can increase with water temperatures. River flows below WVS dams are supplemented in the summer and early fall using reservoir storage, diluting pollutant concentrations.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Joel Myers	Independent Citizen	6. The Corps of Engineers has already admitted to the release of invasive apex salmon predator fish into the Willamette River. Walleye. Reminiscent of the Spotted Owl activities of the 1990's. when Federal forest officials shut down all forest activities ,harvest etc, over protection of the spotted owls. As it turned out the spotted owl decline has been due to an invasive Barred owl species feasting on the spotted owl all along. Now it is planned to kill 500,000 Barred owls as a "possible" control. In the meantime over 1,000,000 acres of prime protected forest have burned in Oregon, the owls population have declined. Essentially nothing was accomplished in 35 years by these policies. The generation has lost the revenue from the forest. The communities that relied on the forest have diminished. There has been no data released that the massive Draw down technique of reservoirs has any real success. There are many options available to the management agencies for fish that have not been tried. There are many contributing factors effecting the fish populations . The draw down will effect hundreds of thousands of people in the Willamette Valley and cost municipalities millions of dollars. Again, with no supportive data. It appears the process is incomplete. And the drawdown is not the answer . Effecting to many people and costing to much .	USACE did not release walleye into the Willamette River Basin. Studies at other reservoirs have confirmed that drawdowns improve downstream passage and survival for juvenile salmon when these fish pass through non-turbine outlets. The operation strategy is based on established fish behavior. Studies show that juvenile salmon have higher survival rates when they pass WVS dams through non-turbine outlets at shallower depths. The target drawdown pool elevation for the proposed Detroit Reservoir drawdown is 1395 feet which is 50 feet above the center line of the upper regulating outlets at Detroit Dam. Benefits for juvenile Chinook would begin with any reduction in the pool elevation, but the full benefits of the proposed operation would be when the target elevation is achieved. Juvenile Chinook prefer to pass dams using outlets at depths of 50 feet or less, however some will dive over a hundred feet (especially when there is only one outlet operating). This operation would reduce the number passing through the turbine penstocks and allow passage through the non-turbine regulating outlets. This operation balances providing downstream passage and the ability to refill the reservoir to support other objectives, including recreation and downstream water supply the following year. Survival studies of juvenile Chinook passing Green Peter Dam show an estimated survival over the spillway in spring, and through the regulating outlets during the drawdown in fall of about 70%. This survival rate is higher than for fish passing through WVS turbines thereby demonstrating a benefit compared to operations where mostly turbines are operated (i.e. without spring surface spill or without a deep drawdown to the regulating outlet in fall). USACE recognizes the immediate impacts are a serious concern, including those to kokanee other resident fishes and associated economic impacts. A phased, gradual implementation of the proposed deeper drawdown of Detroit with constant water quality monitoring would reduce the risk of releasing high turbidity water downstream. Although there could still be significant impacts to the kokanee fishery, a late-fall drawdown schedule would help reduce impacts on both the kokanee fishery and the peak summer recreation season, thereby reducing economic disruption.
Ryan Krabill	Oregon Farm Bureau	On behalf of the Oregon Farm Bureau (OFB), Oregon's largest general agricultural organization representing farmers, ranchers, and rural communities statewide, we appreciate the opportunity to submit comments on the Draft Supplemental Environmental Impact Statement (SEIS) for continued operations and maintenance of the Willamette Valley System (WVS). These comments build upon and reaffirm OFB's prior submissions during the six-year NEPA review that culminated in the April 2025 Final Environmental Impact Statement (FEIS), as well as OFB's June 2025 comments submitted in response to the Notice of the forthcoming SEIS. While we recognize the limited scope of the SEIS, the proposed actions—particularly the analysis of ceasing federal hydropower operations and the late fall/early winter deep drawdown of Detroit Reservoir—raise serious, unresolved concerns for agricultural producers, municipal water systems, rural communities, public health, and energy reliability across the Willamette Valley and Santiam Canyon.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Ryan Krabill	Oregon Farm Bureau	Continued Concerns Regarding Hydropower Elimination As stated previously, OFB remains deeply concerned by the analysis of an alternative that would cease federal hydropower operations at Willamette Valley dams. Hydropower in the basin provides clean, renewable, dispatchable electricity that supports rural energy reliability, emergency response capacity, and grid resilience particularly during wildfire events and major outages when islanding capability is critical for isolated communities. The Draft SEIS does not adequately demonstrate how the loss of hydropower generation would be replaced without increasing costs to ratepayers, undermining rural resiliency, or forcing greater reliance on less reliable or higher-emission energy sources. Hydropower revenues also help offset operation and maintenance costs across the multi-purpose reservoir system. Their removal risks shifting long-term financial burdens onto water users, taxpayers, and rural communities without a clear or equitable mitigation strategy.	Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects. It also analyzes the amount of power that that would no longer be produced at USACE projects in Section 3.12. However, replacing the loss of hydropower with other sources of power is not within the jurisdiction and control of the U.S. Army Corps of Engineers as it is not a power marketer or utility. NEPA does not require USACE to speculate on how other entities would address the power deficit.
Ryan Krabill	Oregon Farm Bureau	Detroit Reservoir Deep Drawdown Raises Unacceptable Risks OFB is particularly concerned with the proposed late fall/early winter deep drawdown of Detroit Reservoir to facilitate juvenile fish passage. While the SEIS acknowledges adverse effects, the magnitude and severity of those impacts are understated, and critical lessons from recent drawdown experiences elsewhere in the basin are not fully incorporated.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. The Green Peter drawdown mobilized the most sediment and exposed a lot of sediment from highly erodible mudflats. The size and erodibility of mudflats depend on the soils in, the vegetation around, and slope of a reservoir thus they vary from location to location. USACE assessed the elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.
Ryan Krabill	Oregon Farm Bureau	Drinking Water Reliability and Public Health Detroit Reservoir is integral to drinking water supplies for downstream communities in the North Santiam Basin, including Salem and numerous smaller municipal and rural systems. Deep seasonal drawdowns increase turbidity, mobilize fine sediment, and elevate the risk of harmful algal blooms—placing significant strain on drinking water treatment facilities and creating real public-health vulnerabilities. Recent drawdown operations at other Willamette Valley reservoirs have demonstrated that turbidity impacts can be severe, prolonged, and costly for downstream water providers. Despite this real-world experience, the SEIS does not provide sufficient quantitative modeling of sediment mobilization, turbidity thresholds, treatment system capacity, or emergency response planning. Proceeding without this analysis risks repeating known failures and placing an unacceptable burden on communities that depend on reliable, clean drinking water.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Ryan Krabill	Oregon Farm Bureau	Water Security for Agriculture and Fire Suppression Deep drawdowns also jeopardize spring refill reliability, reducing stored water availability for irrigation, municipal supply, and emergency uses. For agricultural producers, dependable seasonal storage is essential to crop viability, livestock operations, and food production. In addition, Detroit Reservoir serves as a strategic water source for aerial wildfire suppression. Reduced reservoir elevations during shoulder seasons compromise access to this critical resource at a time when wildfire risk remains high.	Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure is based on model results and does not show how real-time water management can minimize negative effects to reservoir elevations. The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill. Even during the drawdown, a large pool would remain.
Ryan Krabill	Oregon Farm Bureau	Recreation, Local Economies, and Community Recovery Detroit Lake is one of the most heavily used recreational reservoirs in the Willamette Basin and a cornerstone of the Santiam Canyon economy. Earlier and deeper drawdowns shorten the recreation season, limit boat ramp access, degrade reservoir aesthetics, and threaten the viability of local marinas, campgrounds, lodging providers, and small businesses. These communities are still recovering from the devastating 2020 wildfires. The SEIS's reliance on broad regional economic modeling obscures the acute, localized economic harm that would be borne by Detroit, Idanha, and surrounding communities. NEPA requires a transparent evaluation of these localized impacts where intensity and severity are high, and that standard has not been met.	The SEIS notes that the 2020 North Santiam River Subbasin wildfires resulted in substantial adverse effects on opportunities (Section 3.11 Socioeconomics, Section 3.11.3.1 Methodology, SEIS section 3.6, Vegetation, section 3.6.2.3, 2020 Wildfires). USACE updated SEIS 3.11 Socioeconomics, section 3.11.2.1 to describe the relationship between the socioeconomic impacts and location specific impacts. Effects of employment industry adjustments specific to a community connection to the landscape and community identity cannot be known with certainty, these updates speak to the scale of the Environmental Consequences analyses completed.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Ryan Krabill	Oregon Farm Bureau	Resident Fisheries and Kokanee Impacts The SEIS places heavy emphasis on ESA-listed anadromous fish while giving insufficient attention to resident fisheries, including the kokanee fishery at Detroit Reservoir. Deep drawdowns degrade spawning habitat, increase entrainment and mortality, and risk collapsing fisheries that provide substantial recreational and economic value to the region. The loss of kokanee at Green Peter Reservoir following drawdown operations should serve as a clear warning, yet the SEIS does not adequately analyze population-level effects, mitigation measures, or adaptive safeguards for resident fish.	USACE recognizes the immediate impacts are a serious concern, including those to kokanee other resident fishes and associated economic impacts. The SEIS accounts for impacts to kokanee and other resident fishes in the reservoir using available information. However a model kokanee population dynamics is not available. USACE relied on modeling of hydrology and quality, including reservoir volume and dam discharge and water temperatures, then qualitatively assessed the impacts to kokanee and other resident fish based on habitat changes from hydrology and water quality and dam passage conditions. The SEIS also assesses impacts to recreation and socio-economic impacts. The local kokanee fishery at Green Peter Reservoir has experienced significant losses due to the deeper reservoir drawdowns. Taking action for fish passage at Detroit is a legal requirement under the Endangered Species Act. The proposed Detroit drawdown operation was included in NMFS 2024 Biological Opinion as an operation to improve downstream passage for juvenile salmon until a long-term proposed structure for downstream fish passage is funded and completed. When compared to dam operations where most discharge is through turbines, studies at Green Peter confirmed that the drawdown improved downstream passage and survival for juvenile Chinook salmon, which is the primary goal of the proposed drawdown at Detroit. A phased, gradual implementation of the proposed deeper drawdown of Detroit with constant water quality monitoring would reduce the risk of releasing high turbidity water downstream. Although there could still be significant impacts to the kokanee fishery, a late-fall drawdown schedule would help reduce impacts on both the kokanee fishery and the peak summer recreation season, thereby reducing economic disruption. Stocking of hatchery trout as funded by USACE will continue. Stocking of kokanee has occurred in Green Peter and Detroit reservoirs and may occur in the future by ODFW.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Ryan Krabill	Oregon Farm Bureau	Uncertain Benefits, Real and Lasting Costs OFB continues to question whether the proposed drawdown will deliver meaningful, measurable benefits for ESA-listed fish populations. The SEIS does not provide Detroit-specific survival modeling, basin-wide population response analysis, or empirical evidence demonstrating that similar drawdowns have improved fish recovery outcomes elsewhere in the system. In contrast, the adverse impacts to water quality, water supply, recreation, energy reliability, and rural economies are well documented and immediate.	USACE recognizes the immediate impacts are a serious concern, including those to kokanee other resident fishes and associated economic impacts. The SEIS accounts for impacts to kokanee and other resident fishes in the reservoir, using available information. However a model kokanee population dynamics is not available. We relied on modeling of hydrology and quality, including reservoir volume and dam discharge and water temperatures, then qualitatively assessed the impacts to kokanee and other resident fish based on habitat changes from hydrology and water quality and dam passage conditions. The SEIS also assesses impacts to recreation and socio-economic impacts. The local kokanee fishery at Green Peter Reservoir has experienced significant losses due to the deeper reservoir drawdowns. Taking action for fish passage at Detroit is a legal requirement under the Endangered Species Act. The proposed Detroit drawdown operation was included in NMFS 2024 Biological Opinion as an operation to improve downstream passage for juvenile salmon until a long-term proposed structure for downstream fish passage is funded and completed. When compared to dam operations where most discharge is through turbines, studies at Green Peter confirmed that the drawdown improved downstream passage and survival for juvenile Chinook salmon, which is the primary goal of the proposed drawdown at Detroit. A phased, gradual implementation of the proposed deeper drawdown of Detroit with constant water quality monitoring would reduce the risk of releasing high turbidity water downstream. Although there could still be significant impacts to the kokanee fishery, a late-fall drawdown schedule would help reduce impacts on both the kokanee fishery and the peak summer recreation season, thereby reducing economic disruption. Stocking of hatchery trout as funded by USACE will continue. Stocking of kokanee has occurred in Green Peter and Detroit reservoirs, and may occur in the future by ODFW.
Ryan Krabill	Oregon Farm Bureau	Need for Reasonable Alternatives and Stronger Safeguards NEPA requires a rigorous evaluation of reasonable alternatives that avoid or minimize harm. The SEIS should more fully analyze operational approaches that reduce drawdown depth or duration, modify timing to avoid conflict with drinking water and recreation needs, accelerate structural fish passage solutions, and incorporate enforceable adaptive management triggers. Clear accountability for costs, risks, and mitigation must be established before irreversible actions are taken.	The SEIS analyzes the effects of a reasonable range of nine different alternatives both quantitively and qualitatively as appropriate. Appendix A describes the development of the range of reasonable alternatives analyzed.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Ryan Krabill	Oregon Farm Bureau	Conclusion OFB supports balanced, science-based stewardship of Oregon's water, energy, and environmental resources. However, the Draft SEIS continues a trajectory that prioritizes speculative ecological outcomes over demonstrated, longstanding public benefits. Eliminating hydropower and implementing deep reservoir drawdowns without clear evidence of necessity or effectiveness places Oregon's agricultural producers, rural communities, and critical infrastructure at unnecessary risk. We respectfully urge the U.S. Army Corps of Engineers to reconsider the scope and assumptions of the Draft SEIS, strengthen its analysis of real-world impacts, meaningfully engage affected communities, and pursue alternatives that protect both ecological objectives and Oregon's agricultural and rural future. Thank you for the opportunity to provide comment. OFB remains committed to constructive engagement and stands ready to work with the Corps to identify solutions that reflect the full range of authorized purposes and public interests served by the Willamette Valley System.	Thank you for your comments. They will be taken under consideration.
Scott Simms	Public Power Council	The Public Power Council (PPC) appreciates this opportunity to provide comments on the U.S. Army Corps of Engineers' (Corps) Draft Supplemental Environmental Impact Statement (Draft SEIS) for the operations and maintenance of the Willamette Valley System. PPC is the trade association representing the broadest diversity of Northwest public power utilities with preference rights to purchase wholesale power and transmission services from the Bonneville Power Administration (BPA). Collectively, our members purchase 90% of the power generated at the multipurpose dams of the Federal Columbia River Power System (FCRPS), including those operated by the Corps. PPC members repay in full and with interest the vast majority the costs associated with the generation and delivery of hydropower, including joint costs assigned to the power function. Our members rely on these services to provide a reliable, economic, and environmentally responsible power supply to the communities and businesses they serve – at cost. This includes final "take or pay" responsibility for costs of the power system operations and maintenance of the Willamette Valley System. As such, remedying the strained economics of hydropower at the Willamette Valley System is vital to the long-term affordability of our members' power supply.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Simms	Public Power Council	Background PPC understands that the Corps has entered into an expedited SEIS process – publishing both a Notice of Intent to prepare an SEIS on May 16, 2025 and a Draft SEIS on November 14, 2025 – with the goal of satisfying legal obligations that were not met by the original EIS released April 11, 2025. Within this context, PPC offers the following comments on the draft SEIS with goal of motivating the Corps to rethink its alternative development prior to finalization. PPC is disappointed that the Corps chose not to seek input from affected stakeholders and Cooperating Agencies in scoping Alternative 6. A transparent and inclusive region-wide, dam-by-dam review remains the most likely path to achieving fast, cost-effective safe passage for ESA-listed fish. Congress and regional stakeholders intended for Section 1326 of WRDA 2024 to prompt that review. Unfortunately, in developing Alternative 6, the Corps unilaterally narrowed the scope of non-hydropower alternative analyses to a single "full deauthorization" scenario that reconfigures penstocks, removes turbines and adds cone valves while retaining costly fish passage and water quality structures previously included in the Preferred Alternative. This path is both cost prohibitive and generally associated with worse outcomes for downstream water quality and fish mortality.	Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. Appendix A, Chapter 2.6 of the SEIS includes a dam by dam evaluation of non-hydropower measures developed for Alternatives 6. Public scoping began on May 16, 2025 with publication of a Notice of Intent in the Federal Register (90 FR 21015). USACE held four scoping meetings to solicit input from affected stakeholders, cooperating agencies, and members of the public. USACE held two scoping meetings in Detroit, Oregon and Salem, Oregon. Two additional virtual meetings were held on Microsoft Teams.
Scott Simms	Public Power Council	All told, the Corps is forecasting Alternative 6 to cost $2.5 billion in incremental capital and $48 million in incremental annual O&M, with their own high-end estimates placing those same components at $3.7 billion and $63 million. Depreciated over 30 years, the cost impact on BPA's wholesale power rate would be 3-4.5%, a huge increase considering the Willamette Valley System generates less than 1.5% of BPA's firm energy and considering there are other mounting cost pressures across the FCRPS. Notably, these estimates for proposed Willamette upgrades do not account for inflation and many of the large capital projects in MO6 are the sort of bespoke, experimental projects that have experienced major cost overruns in the past. Adding to our concern, for these capital projects to meet ESA requirements they also need to function properly, and the custom-built and unproven nature of many of the proposed projects exposes ratepayers to additional cost risks should these projects fail to achieve their intended biological benefit.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Simms	Public Power Council	PPC encourages the Corps to evaluate non-hydropower alternatives that keep the turbines in place and allow for reclassification of the power function as incidental to all other authorized purposes. BPA has identified this step as critical to the long-term financial health of the FCRPS system while also ensuring timely, cost-effective compliance with the ESA. In its current form, PPC is staunchly opposed to moving forward with detailed evaluation of Alternative 6 until a feasible non-hydropower alternative is developed. Additionally, PPC calls on the Corps to meet the still-outstanding deliverables from WRDA 2022 to complete disposition studies. PPC stands ready to work as a partner to resolve the grave economic challenges faced by these projects in a manner that provides the best value for the communities and businesses served by public power, fish and wildlife, and the crucial flood control purposes of the Willamette Valley System.	Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. USACE assessed hydropower deauthorization and submitted the WRDA 22 report to the Assistant Secretary of the Army for Civil Works in June 2024. The current Administration is reviewing the report and will release it to Congress.
Brent Stevenson	Santiam Water Control District	Executive Summary SWCD appreciates the opportunity to comment on the SEIS. Our position is clear: irrigation remains the primary purpose of Bureau of Reclamation water rights in the North Santiam Basin. While we recognize the need for narrowly tailored measures to comply with ESA requirements, we strongly oppose broad or permanent reallocation of irrigation water for other uses. The SEIS must address critical gaps in modeling, legal compliance, and operational planning. Failure to do so risks violations of NEPA's hard look requirement (42 U.S.C. § 4332(2)(C)), arbitrary and capricious decision-making under the APA (5 U.S.C. § 706(2)(A)), and potential ESA non-compliance. Key concerns include reservoir refill uncertainty, climate resilience, water quality risks, coordination failures, equity in allocation, and USBR's lack of leadership on irrigation impacts. Importantly, maintaining a moratorium on new agricultural irrigation contracts while holding water in Detroit Reservoir for recreational purposes is inequitable and contrary to BOR's irrigation mission. This inequity could result in thousands of acre-feet of water being withheld from agricultural use annually, causing severe economic harm to the District as well as regional producers. These issues have significant economic consequences for agriculture and municipal supply and expose agencies to litigation risk if not resolved	Congress authorized the reallocation of conservation storage space system-wide from joint-use to three specific uses in WRDA 2020 as part of the Willamette Basin Review Project that concluded in 2020. That project is described in more detail in Chapter 1. Impacts on stored water users from operational changes are addressed in Section 3.13 of the SEIS. Water quality impacts are described in Section 3.15

Commenter Name	Commenter Affiliation	Comment	USACE Response
Brent Stevenson	Santiam Water Control District	Introduction On behalf of the Santiam Water Control District (SWCD), thank you for the opportunity to provide comments on the Supplemental Environmental Impact Statement (SEIS) for the Willamette Valley System. SWCD manages critical water rights and infrastructure serving agricultural producers, municipal partners, and environmental stakeholders in the North Santiam Basin. Our operations include delivery of raw water to the City of Stayton and management of irrigation water including Bureau of Reclamation (BOR) contract water. The proposed operational changes outlined in the SEIS have significant implications for water reliability, municipal supply, agricultural productivity, and ecological objectives. These comments build upon our prior submissions and incorporate new considerations introduced in the SEIS. Our intent is to ensure the Final SEIS fully addresses operational, contractual, and environmental consequences of proposed alternatives, consistent with NEPA (42 U.S.C. § 4332), ESA (16 U.S.C. § 1536), Oregon water law, and federal reclamation law.	Thank you for your comments. They will be taken under consideration.
Brent Stevenson	Santiam Water Control District	I. Carry-Forward Comments from Previous EIS Submission 1. Contract Holder Protections: Existing contract holders must be grandfathered and protected from disproportionate reductions. All new contracts should utilize a proportionate reduction system during shortages (Draft SEIS, Section 3-1004). Preference should be given to existing users and ESA needs before new uses are contemplated to align with Oregon water law.	Congress authorized the reallocation of conservation storage space system-wide from joint-use to three specific uses in WRDA 2020. This reallocation is complete. Impacts to future stored water users is addressed programmatically in Section 3.13 of the SEIS.
Brent Stevenson	Santiam Water Control District	2. Water Rights and Storage: The SEIS should provide a tabulation of storage amounts and releases per reservoir and use (Draft SEIS, Appendix N). Clarify potential conflicts with Oregon water law and priority dates to prevent litigation risk.	This information will be part of future annual monitoring reports and used for ongoing adaptive management of intra-season water management.
Brent Stevenson	Santiam Water Control District	3. Biological Opinions (BiOps): Explain the relationship among the 2008, 2019, and forthcoming BiOps and clarify the moratorium on new irrigation contracts in the Santiam Basin (Draft SEIS, Section 3-1033). Failure to reconcile these obligations creates uncertainty and potential ESA compliance issues.	Section 1.3.3 of the Final EIS and SEIS discuss the history of ESA compliance, including these Biological Opinions.
Brent Stevenson	Santiam Water Control District	4. Water Management Framework: Develop an adaptive management plan that balances ESA flow targets with other objectives (Draft SEIS, Appendix N). Outline proportionate reduction strategies for future contracts to ensure fairness and compliance. Resolve current US BOR contract language with SEIS and EIS operational concepts.	Thank you for your comments. They will be taken under consideration.
Brent Stevenson	Santiam Water Control District	5. Modeling and Data Accuracy: Use current datasets such as the 2020 Modified Flow Dataset (Draft SEIS, Section 2.3.3). Clearly state assumptions and correct inaccuracies, including evaporation embedded in inflow calculations, which could misrepresent available storage.	Chapter 2 of Appendix B describes the development of inflow hydrology incorporating information from several sources. The 2020 Modified Flows were not published when the WV EIS began and could not be used on their own because they do not include records for all necessary locations. Evaporation is embedded in inflows calculated directly from observed outflow and change in reservoir elevation because evaporation reduces reservoir elevations.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Brent Stevenson	Santiam Water Control District	6. Impact Analysis: Conduct reservoir-specific analysis rather than system-wide only (Draft SEIS, Section 3-1033). Quantify ESA flow needs at the tributary level to avoid masking major localized impacts.	Tables 3-38 and 3-39 show the peak stored water amounts per reservoir and system-wide basis. The analysis of effects to stored water users was conducted on a system-wide basis, matching how the reallocation of conservation storage was completed.
Brent Stevenson	Santiam Water Control District	II. New Concerns Specific to the Supplemental EIS 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.	Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure is based on model results and does not show how real-time water management can minimize negative effects to reservoir elevations. The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill.
Brent Stevenson	Santiam Water Control District	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 storage 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. The release of flows in the fall could affect two separate water years (pre and post Oct 1) and therefore storage allocations, releases and water right compliance should be clarified.	Chapter 3 analyzes impacts on water supply. The water management framework of the storage allocations is outside the scope of this SEIS. USACE is working on an legal framework for the releases and storage accounting with the State of Oregon.
Brent Stevenson	Santiam Water Control District	Equity in Allocation The SEIS does not clearly define prioritization during shortages (Draft SEIS, Section 3-1004). Proportionate reduction strategies across user types are necessary to ensure fairness and compliance with Oregon water law. Maintaining a moratorium on new agricultural irrigation contracts while continuing to store water in Detroit Reservoir primarily for recreational purposes is inequitable and contrary to BOR's irrigation mission. This practice fails to meet NEPA's requirement for a balanced evaluation of alternatives and consideration of socioeconomic impacts. Allocation decisions should prioritize irrigation and ESA compliance over discretionary uses such as recreation, consistent with NEPA's requirement for balanced evaluation of alternatives. 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.	The SEIS is a programmatic assessment of effects from alternative ways to operate and maintain the WVP. The SEIS evaluated effects on many resource areas, including irrigation, on a programmatic level. The analysis requested in this comment is beyond the scope of the SEIS.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Brent Stevenson	Santiam Water Control District	USBR Accountability USBR holds statutory obligations under the Reclamation Act (43 U.S.C. § 371 et seq.) to protect irrigation users, yet the EIS and SEIS demonstrates inadequate involvement by USBR in analyzing irrigation impacts. Responsibility is delegated to USACE, whose primary mission does not include irrigation economics or water rights administration (Draft SEIS, Appendix N). This creates a regulatory gap and potential legal liability for USBR under NEPA and the APA (5 U.S.C. § 706(2)(A)), as foreseeable impacts to irrigation users have not been analyzed. Furthermore, USBR's failure to address the Corps' practice of holding water for recreation while restricting agricultural expansion exacerbates inequities and undermines federal reclamation objectives. This policy choice, if left uncorrected, may constitute arbitrary and capricious action under APA standards and expose agencies to litigation risk for failing to consider reasonable alternatives that protect irrigation interests. BOR Water Rights and ESA Compliance: The Bureau of Reclamation water rights held in the North Santiam Basin were established for irrigation purposes under federal reclamation law. SWCD does not support broad or permanent reallocation of these irrigation rights for other uses, as doing so would undermine the original purpose and reduce reliability for agricultural users who depend on these allocations for crop production and economic stability. The District is particularly concerned with adding or including operations that require stored water and would trigger a shared reduction related to our current contract language. However, SWCD recognizes that limited, temporary adjustments may be necessary to meet legal compliance obligations under the Endangered Species Act (ESA). Any such measures should be narrowly tailored, science-based, and transparent, with clear mitigation strategies to minimize adverse impacts on irrigation deliveries. USBR must lead this analysis and coordination, as delegating responsibility to USACE—whose mission does not include irrigation economics or water rights administration—creates a regulatory gap and exposes both agencies to potential legal liability under NEPA and the Administrative Procedure Act for failing to adequately analyze foreseeable impacts to irrigation users. SWCD commends the Corps for its efforts in preparing the SEIS and appreciates the opportunity to provide input. We request that the Final SEIS incorporate tributary-specific modeling and updated climate data, provide comprehensive analysis of contractual obligations and mitigation strategies, address water quality risks and outline robust contingency planning, ensure transparent communication and equitable water management, and engage USBR in a leadership role to avoid regulatory gaps and legal exposure. SWCD reserves all rights under NEPA, ESA, and APA to ensure compliance with applicable laws and regulations. Please contact our office at [phone/email] for any clarification or further discussion.	Bureau of Reclamation was a cooperating agency for the NEPA process and resulting SEIS. They had direct impact on how irrigation impacts were analyzed in the SEIS. Chapter 3 describes impacts on water supply and irrigation. The legal topics raised in this comment are beyond the scope of this SEIS and are focused on implementation of the Willamette Basin Review reallocation of storage space.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Jess Martin	Independent Citizen	Putting so much at risk because of fish that activists are using as an excuse is simply not fair. The risks are many but the ones that I'm most concerned about are negative impact on water quality downstream, impacts on the Detroit economy, killing of so many Kokanee and other local fish, as well as messing with water levels in an area that is prone to wild fires all while we already lost so much of our trees during the 2020 fires which is causing changes in the areas climate. 'Natives' are looking to destroy what was built and they will not stop at drawdowns, they want to blow up our aim, and you should know that. Activists like these messed with our logging industry not long ago, which still has a negative impact on our States economy, and time showed that logging wasn't hurting the 'endangered species' that they were 'protecting', it was actually a predator that still thrives. Activists need to get a job, and work like we do over here and stop wasting our time and money. Leave our Reservoir alone.	Thank you for your comments. They will be taken under consideration.
Scott Covington	USFWS	The USFWS has reviewed sections of the dSEIS for the WVS Operations and Maintenance (dated November 2025) as they pertain to authorities and responsibilities of the USFWS. We provide general and specific comments on the following pages. Thank you for the opportunity to provide these comments.	Thank you for your comments. They will be taken under consideration.
Scott Covington	USFWS	GENERAL The USFWS remains concerned that the measures and alternatives considered, included and analyzed were unnecessarily constrained; limiting the scope of potential opportunities to improve fish passage conditions at specific dams while still meeting the authorized purposes of those projects. We provided this feedback to USACE in USFWS Comments on Willamette Valley Operations and Maintenance SEIS Scoping dated June 6, 2025. The statements, "Though downstream fish passage conditions are similar to Alternative 5, downstream passage survival would be negatively impacted due to the installation of cone-valves and in-line orifices which have more adverse effects on fish than turbines. Fish would also experience higher total dissolved gas due to installation of energy dissipation devices in the penstocks," are great examples of why additional measures to improve fish passage should be considered, included and analyzed in this SEIS (Sec. 5.1.9.9, p. 252). The end of hydropower production cannot be done in a vacuum without consideration for and taking necessary actions to maintain the other authorized purposes of the dams. To do so, without considering those authorized purposes, may not allow this alternative to be feasible. • We recommend that USACE recognize this shortcoming of the SEIS if additional measures are not considered, included and analyzed.	Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. Estimates for fish survival through cone valves and in-line orifices are based on conceptual designs. If Congress deauthorizes hydropower, a future design process could consider specific designs for cone valves and in-line orifices which reduce risks of fish injuries or mortality. The long-range plan proposed under Alternative 6 includes measures to improve downstream fish passage at WVS dams using structures or operations to increase passage through spillways and regulating outlets, instead of through penstocks with cone valves and in-line orifices. Alternative 6 looked at how deauthorizing hydropower would impact other purposes. The breadth of alternatives considered but dismissed before fully analyzing a reasonable range of nine alternatives are detailed in Appendix A.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Covington	USFWS	The USFWS remains significantly concerned with the Implementation Timeline (Appendix N, Chapter 2) as we stated in USFWS Comments on the USACE 2022 Willamette Valley System Operations and Maintenance Draft Programmatic Environmental Impact Statement (dPEIS) dated February 21, 2023. Planned construction of fish passage solutions needed immediately are spread across the next 20 years; and that may be a best-case scenario. Fish need both upstream and downstream passage solutions at all Federal projects. Providing upstream and downstream passage at projects provides the opportunity for bull trout and other species to reduce the risk from local threats that may be present both upstream and downstream of the project through connectivity that allows individuals to move away from the threat. This is the solution that provides the most flexibility for bull trout and other species. The USFWS appreciates the USACE support in completing a Fish and Wildlife Coordination Act Report (FWCAR) in included in Appendix Q. This report analyzes the impacts and benefits of the alternatives presented in the final EIS to the broader ecosystem species and habitats. This information should prove useful to management of the WVS going forward. Appendix Q was missing from the report available for public review. We expect it, inclusive of the USFWS FWCAR, to be a part of the final SEIS.	USACE included the USFWS FWCAR in Appendix Q of the final SEIS.
Scott Covington	USFWS	COMMENTS ON AUTHORIZED PURPOSES Throughout the dSEIS, the general statement is made that Congress authorized eight purposes for the WVS. While this is true, the statement suggests that all purposes are for all dams. According to "Authorized and Operating Purposes of Corps of Engineers Reservoirs" (USACE1992), there are multiple and varying purposes for each dam. This should be transparent to best understand and creatively develop all current and future alternative solutions for operation and maintenance of the WVS in accordance with the authorized purposes. •We recommend reference to this report be included and a table or Appendix that lists authorized purposes for each dam. Big Cliff Dam has just two operating and authorized purposes: Hydroelectric power and reregulation under the authorizing law PL-80-858. Dexter has those two same operating and authorized purposes under authorizing law PL-81-516 in addition to recreation under authorizing law PL 78-534. With deauthorization of hydropower at these projects, the authorities for those projects are eliminated or greatly reduced •It is important to be transparent that these are not flood control structures and to provide the potential for a greater variety of actions should the authority for hydropower be eliminated.	Appendix S, Table 4-1 lists the different authorized purposes by dam. Big Cliff and Dexter dams are authorized for hydropower, recreation, and water supply. They are not listed as flood control projects.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Covington	USFWS	Dam removal example of 'alternatives considered but eliminated from further review' due to existing authorities may not be the best example anymore (Sec 2.9, p. 20). A dam removal measure could be coupled with the new measures in Alternative 6 under the same interpretation of the WRDA 24 language. •Consider another example of an alternative considered but eliminated from further review. •Reconsider all measures previously eliminated due to hydropower authority and integrate those into the current analyses. If they are not integrated, provide rationale that is measure specific and transparent as to why they are not included in the SEIS analyses. •As part of our request that USACE consider other alternatives, we ask for an assessment of alternate Cougar Dam operations to enhance fish passage. Utilization 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, would help provide safer, year-round downstream passage. We recognize this will also lead to deauthorization of other purposes (other than flood risk management), and recommend further analysis be included in the final SEIS.	All the WV dams have multiple authorized purposes (Appendix S, Table 4-1). Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. USACE did not consider dam removal as that would require eliminating all authorized purposes at a dam, not just hydropower,
Scott Covington	USFWS	There is an inherent environmental impact that accompanies the existence of a dam. That should be addressed in an EIS when the need for that dam ceases. •We recommend that language be included in the SEIS that recognizes the existing environmental impact of these two projects (Big Cliff and Dexter) specifically and the need that no longer exists if hydropower is removed from the WVS.	Dexter and Big Cliff dams are operated for recreation and water supply in addition to hydropower. Dam removal was not evaluated because WRDA 24 required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects. This was a clear directive to analyze a single alternative that ends hydropower operations, not operations for all other purposes or the removal of the WVS projects. Under NEPA USACE could have fully analyzed an alternative that included dam removal but instead developed reasoned screening criteria that removed those alternatives from a more robust analysis. The breadth of alternatives considered but dismissed before fully analyzing a reasonable range of nine alternatives, are detailed in Appendix A.
Scott Covington	USFWS	We understand the rationale for incorporating information from the Final EIS (FEIS) by reference. The absence of those sections are confusing when no direction is provided on where that information can be found. In some cases, the information in the parallel section of the FEIS has been moved to an appendix. For example, Sections 5.3 and 5.4 have been incorporated by reference in the dSEIS. Chapter 5 of the FEIS references Appendix A of the FEIS. The information in those specific sections, however, can be found in Appendix N of both the FEIS and the dSEIS. •We recommend that reference be provided to specific locations in the FEIS and SEIS where the information can be found.	USACE regulations direct the agency to incorporate by reference to the maximum extent possible. 33 C.F.R. 230.26(b). We acknowledge that in doing so the structure of the SEIS with references to the FEIS can be challenging to follow. To help the reader the document starts with a How to Use This Document, tables were reproduced with all the alternatives for easier comparison and cross references were provided.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Covington	USFWS	Section 1.10 has been 'Incorporated by reference.' The approach to this section should be reconsidered. In the FEIS, USACE did not consider potential alternatives or measures inconsistent with the purpose and need for the Proposed Action, meaning measures could not prevent or eliminate operations for any authorized purpose and needed to improve conditions for ESA listed species. However, WRDA 24 requires USACE to evaluate a new alternative that ceases Federal hydropower operations. Therefore, we need a clear understanding of what projects are authorized for what purposes. • We recommend reference to USACE 1992 and a table in this section or Appendix be included that lists authorized purposes for each dam. • Section 1.11.2.2 discusses operational considerations for hydropower at each project. This would be another place to reference the limited authorized purposes for a few of these projects (e.g., Big Cliff and Dexter).	USACE regulations direct the agency to incorporate by reference to the maximum extent possible (33 C.F.R. 230.26(b)). A lengthy and detailed description of the authorized purposes is in Chapter 1 of the FEIS which was incorporated by reference into the SEIS. USACE included more detail on the hydropower purpose to aid the reader in understanding the addition of Alternative 6. The breadth of alternatives considered but dismissed before fully analyzing a reasonable range of nine alternatives are detailed in Appendix A. Appendix S, Table 4-1 lists the authorized purposes by dam.
Scott Covington	USFWS	COMMENTS ON CLIMATE CHANGE Climate change analyses include no reference to species' climate change vulnerability assessments for bull trout (Dunham 2015) or Pacific lamprey (Wang et al. 2020). An adequate assessment of climate impacts on species addressed in the EIS is challenging without referencing information available from existing climate change vulnerability assessments. Given the qualitative nature of the climate change assessment, this statement is rather definitive: "The EIS actions will not exacerbate climate change impact or adversely affect the WVS and its environment." The summary and conclusions do a good job qualifying the relationships between climate change, the EIS actions and related uncertainty. This statement should also be qualified by framing it relative to uncertainty and the NAA.	Executive Order 14154: Unleashing American Energy rescinded all previous E.O.s and guidance requirements for Federal Agencies when considering climate change in NEPA documents. The FEIS that was completed prior to this and other relevant E.O.s. USACE did attempt to quantify and analyze how climate change would impact the alternatives and environmental conditions. As stated in the SEIS analysis were not updated or removed from the FEIS and SEIS for efficiency. The analysis in the FEIS relied on a qualitative climate change vulnerability assessment framework by Crozier et al. (2019) which was used to score vulnerability of UWR Chinook salmon under each alternative resulting from climate change effects (Appendix E, Fish and Aquatic Habitat Analyses). UWR Chinook salmon scores were considered representative for all cold-water-adapted, sensitive status fish species in the analysis area (e.g., UWR steelhead, bull trout, and Pacific lamprey). The cumulative vulnerability was rated as high to very high among all the alternatives, with the NAA operations rated the highest. As noted, the overall Assessment of Climate Change Impacts (Appendix F1) is careful to account for uncertainty and the qualitative nature of the assessment, and this should be considered when interpreting the purpose of this statement.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Covington	USFWS	COMMENTS ON BULL TROUT The USFWS maintains that bull trout in the Willamette Basin are adfluvial only because they are not afforded passage, and this forced adfluvial life history does not benefit the recovery of bull trout in the Willamette Basin. This comment was provided previously. •We recommend that the sentence in Appendix E, middle of p. E1-3-1, "Currently local bull trout populations above WVS dams primarily exhibit an adfluvial life history, relying on reservoirs for rearing and forage," be amended to read, "Currently local bull trout populations above WVS dams primarily exhibit an adfluvial life history, using reservoirs for rearing and forage." The USFWS also maintains that restoration of passage within the Middle Fork Willamette and the McKenzie Basins is critical to bull trout and that the benefits of safe and effective passage outweigh the stated risks (i.e., increased exposure to recreational fisheries and predatory fish, loss of reservoir habitat, exposure to warmer habitats below dams). Providing and maintaining connectivity is one of the more important climate adaptation actions that can be taken (e.g., https://www.sciencedirect.com/science/article/pii/S0006320720307369 (and references within)).	USACE believes connectivity should be considered in context with the life history patterns, habitat conditions and land use practices in today's environment. Available information shows some bull trout chose to remain upstream of dams while others will move downstream of WVS dams to forage, with the potential to spawn with other populations for those migrating below Cougar Dam. The creation and operations of WVS reservoirs provides bull trout habitat in which they forage and experience higher growth rates than those solely rearing and foraging in streams. The rate of downstream passage of bull trout with improved passage where reservoirs still exist is unknown and may not change from existing conditions. Available genetic data suggests historically there was limited interaction among local bull trout populations in the Willamette. In today's environment, due to the limited spawning habitat below WVS dams, most moving downstream will need to move back upstream of dams to spawn. Up and downstream passage at dams poses increased risks of injury or death, even with improved fish passage conditions. The most intact high-quality habitat for native fishes occurs above dams, Fishing regulations and habitat conditions below WVS dams degrades with distance downstream, also increasing risk of mortality compared to those remaining above dams. Diversity of life history is critical for persistence over time, however in a regulated system some population structures and life history patterns may no longer be productive. NMFS has prioritized access to above dam habitat for Chinook and steelhead to the quality and expected resilience of this habitat under future variability.
Scott Covington	USFWS	In Section 3.8.3.2, p. 130, we have concern with the statement in first paragraph, "Few Bull trout are expected to move downstream due to warmer water temperature conditions…." We are unsure how many bull trout may move downstream. Timing of movement downstream to Lookout Point may vary by time of year and life stage. Any bull trout that move through Hills Creek dam may move downstream in fall or winter (when temperatures are cooler) and return upstream in spring and summer. •We recommend the sentence be changed to, "Any bull trout that move downstream through Hills Creek Dam to Lookout Point Dam will be collected using a floating screen structure and either passed downstream of Dexter Dam or back upstream as directed by State and Federal fish managers."	The recommended change has been made.
Scott Covington	USFWS	In Section 5.1.9.6, p. 249, it is unclear why there would be no habitat gains for bull trout. Alternative 3A indicates that there would be habitat gains for bull trout. With Alternative 3B and deep drawdowns at Cougar (using the diversion tunnel) and Hills Creek, it seems that there should be at least the same habitat gains as Alternative 3A. • We recommend clarifying/correcting the language.	Under Alternative 3B, the spring and fall drawdowns would target the Cougar Dam diversion tunnel resulting in a much lower drawdown than Alternative 3A, whereas under Alternative 3A the spring and fall drawdowns at Cougar are to the regulating outlet. In both alternatives bull trout gain access to river habitat below Cougar Dam, however under Alternative 3B there is a significant reduction in reservoir habitat. Therefore, there were no net gains in habitat for bull trout under Alternative 3B.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Covington	USFWS	In Section 5.1.9.6, p. 250, there is too much emphasis on the negative effects of access to below-dam habitat for bull trout. There is considerable nuance to the statement regarding increased demographic risks to bull trout from providing passage downstream of dams. For example, emphasis is put on the risks especially below Hills Creek Dam. That is true in some cases and places. However, providing that passage downstream also provides access for bull trout into a lot of other tributaries that do not have any greater human disturbance in upper reaches than Hills Creek above the dam (e.g., Salt Creek, Salmon Creek, NF Middle Fork Willamette). There is a balance in management actions that could be emphasized more in this section. • We recommend softening the language and expanding on balance here and elsewhere regarding bull trout response to management actions.	These details are not included in the SEIS Section 5.1.9.6. This comment may refer to the DEIS, where additional details on the effects of bull trout were included in Chapter 5.

Scott Covington	USFWS	COMMENTS ON PACIFIC LAMPREY Pacific lamprey are both culturally and ecologically important. Lamprey are a Tribal Trust species and have a high cultural significance to Native American tribes throughout the Columbia River Basin. Currently, Pacific lamprey are extirpated above the WVS dams, with the exception of Fall Creek Dam (which is discussed later). Consideration of Pacific lamprey passage at the WVS is important because their abundance and distribution has significantly declined throughout its range over the past three decades, and efforts to reverse this decline are needed (USFWS 2019; ODFW 2020). ODFW, in its Coastal, Columbia, and Snake Conservation Plan for Lampreys in Oregon (ODFW 2020, p. 35, 38) identified habitat access (up- and downstream passage) as a primary limiting factor in the Willamette Basin, identifying the 13 dams of the WVS. Lampreys likely provide substantial benefits to ecosystem health and water quality on which ESA-listed fish rely. Lamprey have been documented as prey by many different animal species, including 20 species of fish (both native and non-native), 11 species of birds, and 9 marine mammals (ODFW, 2020, p.119; Table A3.4). Because the caloric content of Pacific Lamprey is significantly higher than salmon (Close et al. 2002; Clemens et al. 2019 as cited in ODFW 2020), lampreys may serve as important "predation buffers" for ESA-listed salmonids and distract predators away from feeding upon salmon at times. ODFW (2020, p. 116) summarized ecological benefits into three categories: 1)'ecosystem engineers;' 2)nutrient suppliers to freshwater ecosystems and recyclers of nutrients within these systems; and 3)prey sources for other animals / predation buffers to salmonid species." ODFW, in its Coastal, Columbia, and Snake Conservation Plan for Lampreys in Oregon (ODFW 2020, p. 116) further describes these categories as follows: "As 'ecosystem engineers' lampreys benefit the surrounding habitat in freshwater streams in ways that differ by life stage. For example, as adults, lampreys construct redds in which they spawn. Construction of these redds alters the streambed in ways that favor aggregations of aquatic insects that process stream nutrients and feed juvenile fishes (Hogg et al. 2014). In addition, the burrowing behavior of larval lamprey has been associated with increased water exchange between the stream and substrate in the streambed, increased oxygen in the substrate, and an increase in fine particulate matter on the surface of the substrate (Shirakawa et al. 2013; Boeker and Geist 2016). "Anadromous lampreys provide marine-derived nutrients to freshwater ecosystems (Close et al. 2002; Nislow and Kynard 2009). Their spawned-out carcasses decay and release nutrients into the surrounding water (Weaver et al. 2015). These nutrients are assimilated by aquatic insects (Weaver et al. 2016), which may be consumed by juvenile salmonids. As nutrient recyclers, larval lamprey feed on detritus and algae and convert these food sources into energy stored as animal (larval lamprey) tissue (Close et al. 2002) that is then available to larger predators that eat them. Lampreys are a prey source for humans (see below) and many different animals (Table A3.4). "Larval and juvenile lampreys migrating downstream may focus the attention of predatory fishes and birds, thereby potentially offering a predation reprieve for juvenile salmon and steelhead. Similarly, the high caloric content, ease of capture (relative to salmonids), and the tendency to migrate in schools may make Pacific Lamprey desirable prey sources for pinnipeds, thereby buffering adult salmon and steelhead from predation (Close et al. 2002)."	Thank you for these comments. They will be taken into consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Covington	USFWS	In the USFWS Fish and Wildlife Coordination Act Report, developed for the USACE's use in this EIS, the USFWS included Recommendations for Pacific lamprey passage, including 1) Complete an upstream lamprey trap and haul for passage Fall Creek Dam to sustain the recently reintroduced population of Pacific lamprey, and 2) Create and implement a prioritization framework for Pacific lamprey conservation and reintroduction of lamprey into historical habitats above the USACE dams in collaboration with the USFWS and other partners in the Willamette Basin, aka the WVS Lamprey Passage Plan. USFWS believes these two items are important commitments the USACE should include in its proposed action, which covers the WVS for the next 30 years. The current preferred alternative only indicates that lamprey passage features (not effective passage) would occur at the Green Peter Dam upstream passage facility. There continues to be no mention of completing passage at Fall Creek Dam, despite effective passage is needed at Fall Creek within five years to maintain the successful reintroduction of Pacific lamprey above Fall Creek Dam.	Thank you for these comments. They will be taken into consideration.
Scott Covington	USFWS	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. 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. We recognized that this will also lead to deauthorization of other purposes (other than flood risk management), and hope that would be part of the final SEIS. Despite the purpose and need of the proposed action is to provide fish passage for the next 30 years and specifically names Pacific lamprey, none of the alternatives results in passage at any of the 13 WVS dams. A commitment by the USACE to collaboratively develop a WVS Lamprey Passage Plan is needed within the proposed action to address the lack of access to historical habitats for over 60 years and benefit this species in decline.	The sufficiency of the BA is outside of the scope of the NEPA document as it is not subject to 42 U.S.C. 4331 et. seq. What action an agency takes for ESA can be informed by analysis contained in a NEPA document but ultimately they are separate legal processes. The Corps described how it scoped and screened alternatives in Appendix A. In the SEIS USACE analyzed how it could make facilities for ESA species more conducive to lamprey and analyzed the effects of the alternatives on lamprey as required under NEPA.
Scott Covington	USFWS	In the Executive Summary, Section 7.2.2, p. ES-10, the last paragraph of 'Effects of Detroit Drawdown' on top of page speaks to the adverse effects to sport fishing but does not explicitly discuss the same effects on native resident fish. Adverse effects to sportfishing due to changes in the reservoir habitat conditions and food availability affecting growth and survival are stated. But this is not explicitly state for native resident fish not part of the sportfish community (e.g., suckers). Increased entrainment is recognized, but not other effects. • We recommend including language addressing native resident fish impacts due to changes in reservoir conditions here and elsewhere in the document.	The executive summary and Section 3.8.4 have been edited to reference effects for native fishes in Detroit Reservoir from the proposed deep drawdown.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Scott Covington	USFWS	There is confusing and/or conflicting language in the second and third paragraphs of the introduction regarding criteria for supplementation in Section 2.1 on page 12. The second paragraph states that the criteria for supplementation have not been met. The third paragraph indicates that supplementing the FEIS would be in furtherance of NEPA, which according to paragraph two is a criterion for supplementation. • We recommend clarifying this language.	The language in the SEIS is correct. The legal criteria requiring an agency to supplement an EIS have not been met instead USACE chose to supplement with the additional analysis required by WRDA 24, in furtherance of NEPA.
Scott Covington	USFWS	Chapters 3 and 4 of Appendix E are not updated to incorporate analysis for Alternative 6. •We recommend adding analysis or reference to Alternative 6 and the existing analyses that are surrogates for that alternative.	Due to similarities in habitat and access to habitat under Alternative 6, analyses in Appendix E Chapter 3 and 4 were not updated. Previous quantitative analysis completed for other alternatives were used for assessing the effect of Alternative 6 which was discussed in Appendix E.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Rachel Dibble, Dorothy Welch	BPA	Bonneville submits the following comments on the Willamette Valley System Operations and Maintenance Draft Supplemental Environmental Impact Statement (DSEIS). Since 2020, Bonneville has been a Cooperating Agency supporting the development of the National Environmental Policy Act (NEPA) analysis. As the Cooperating Agency with special expertise in power and transmission, and the only federal agency entrusted by Congress to market federal power from the Willamette dams, Bonneville recommends important corrections and clarifications to incorporate into the Final SEIS. This letter also reiterates our significant concerns regarding the process used to develop the DSEIS and the resulting analysis of the non-hydropower alternative (Alternative 6). Given our concerns, Bonneville elected not to provide power and transmission analysis during the DSEIS drafting and analysis of Alternative 6 due to a fundamental disagreement with the process that the US Army Corps of Engineers (Corps) followed in preparing the DSEIS and in carrying forward an unfeasible non-hydropower alternative for detailed study. Bonneville's comments center on the misdirected alternative-development process and the lack of viable solutions in the non-hydropower alternative. This DSEIS does not identify a realistic or implementable path to address uneconomic hydropower or adequately respond to Congress's directive authority to formally analyze an alternative that ceases hydropower operation.[1] Bonneville renews its request for a full reset of the current analytical approach by focusing on a dam-by-dam analysis and meeting the still-outstanding deliverables from the Water Resources Development Act (WRDA) of 2022 to complete the disposition studies at each of the Willamette dams. It is critical that this reset occurs through a meaningful collaborative process with all interested stakeholders. [1] *Water Resources Development Act of 2024, Pub. L. 118-272, § 1326, Jan. 4, 2025, 138 Stat. 3143-4.*	USACE assessed hydropower deauthorization and submitted the WRDA 22 deliverable to the Assistant Secretary of the Army for Civil Works in June 2024. The current Administration is reviewing the report and will release it to Congress when the review is complete. The WRDA 22 report informed the alternative formulation and screening for ceasing hydropower operations. USACE consulted BPA extensively throughout the WRDA 22 report process, providing ample opportunities for input on non-hydropower concepts prior to the draft alternative in the SEIS. USACE is retaining Alternative 6, as written in the draft DSEIS, based on its reading of the plain language of Section 1326 of WRDA 2024 for the Final SEIS. Congress directed USACE to analyze "an alternative" that "ceases hydropower operations" at the projects. The Act does not require USACE to analyze numerous alternatives when a reasonable range were developed as part of the original EIS. The Act did not instruct USACE to analyze ceasing operations for other authorized purposes in addition to hydropower, change the amount of hydropower generated at the projects, or select a subset of dams for deauthorization. This was a clear directive to analyze ceasing hydropower operations at all the WVS projects. Appendix A and Chapter 2.6 of the SEIS describe how alternatives were developed dam-by-dam including the non-hydropower measures developed for Alternatives 6. BPA's concerns regarding deficient alternative formulation reflect a disagreement on how many alternatives to analyze. Adding more alternatives to the nine detailed in the SEIS would further drag out the NEPA process. Because NEPA is a procedural statute the Record of Decision cannot deauthorize hydropower at the dams. Congress has the sole power to deauthorize Federal hydropower or remove BPA's responsibility to market power from USACE dams. It is unfortunate that BPA withdrew its analysis for only Alternative 6. As the holding in *Seven Counties v. Eagle Mountain* clarified, USACE may limit its analysis to the reasonably foreseeable effects of the actions for which it has sufficient jurisdiction and control. Alternative 6 analyzes the effects of ceasing hydropower generation at all projects. The reasonably foreseeable effect is the reduction of power generated at USACE projects. However, as BPA states, it is "the only federal agency entrusted by Congress to market federal power from the Willamette dams." USACE is not a power marketer, thus is not required to speculate as to how other power producers or marketers would make up for the loss, as it is outside USACE's jurisdiction and control and is too attenuated for USACE to speculate on. Nor is USACE required to analyze an alternative asking Congress for power marketing authority or find another power marketer. USACE provided a qualitative analysis that describes the impact of the power generation loss and describes the existing sources that power users have at their disposal, as informed by the analysis in the other alternatives. BPA could have provided a market analysis for this loss and a list of other sources to meet this need and impact on the stability of the grid. As stated in this comment BPA chose not to. That does not make the USACE analysis inherently deficient because the effects of not generating power are different than the effects of transmitting power. Therefore, the scope of analysis for Alternative 6 is appropriate.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Rachel Dibble, Dorothy Welch	BPA	It has been five years since Congress first directed the Secretary of the Army to perform an initial analysis on removing power from Cougar and Detroit, and three years since Congress directed the Secretary to perform a disposition study on the removal of the power purpose on the Willamette Valley System as a whole. In that time, no public draft of either report was shared. The Corps has presented outcomes in their formulation of Alternative 6, but only downstream from opaque policy choices and deliberations. Bonneville respectfully requests that the Corps adhere to Congress' direction and perform a collaborative, dam-by-dam examination of a non-power alternative with all stakeholders to achieve a more thorough and useful exploration of potential uneconomic hydropower solutions and less costly passage solutions.	USACE met these requests from Congress with reports prepared outside of this NEPA effort. USACE assessed removing hydropower from Cougar and Detroit dams and submitted the WRDA 20 report to the Assistant Secretary of the Army for Civil Works. The ASA(CW) submitted the WRDA 20 report for Administrative Review in 2022. USACE assessed hydropower deauthorization and submitted the WRDA 22 Report to the Assistant Secretary of the Army for Civil Works in June 2024. The Administration is reviewing these reports and will release them to Congress when the review is complete. The WRDA 22 report informed the alternative formulation and screening for measures developed relating to ceasing hydropower operations. USACE consulted BPA extensively throughout the WRDA report processes and this NEPA process, providing ample opportunities for input on non-hydropower concepts, measures, and ultimately the alternative. USACE retains its reading of Section 1326 of WRDA 2024 for the Final SEIS. Congress directed USACE to analyze "an alternative" that "ceases hydropower operations" at the projects. The Act did not require USACE to analyze numerous alternatives when a reasonable range were developed as part of the original EIS. The Act did not instruct USACE to analyze ceasing operations for any other authorized purpose in addition to hydropower, change the amount of hydropower generated at the projects, or select a subset of dams for continued generation. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. Therefore, other alternatives that would continue hydropower operations in any form were not included in the SEIS. Appendix A and Chapter 2.6 of the SEIS include a dam-by-dam evaluation of non-hydropower measures developed for Alternatives 6. In developing Alternative 6, USACE took a reasoned approach in formulating Alternative 6 based on this language (Appendix A) and the need to safely operate the dams for the remaining authorized purposes. SEIS Table 23. Alternative 6 Measures and Locations list the measures in Alternative 6 dam by dam.
Rachel Dibble, Dorothy Welch	BPA	Bonneville must maintain an economical and reliable power supply.[2] Escalating costs due to diminished power generation resulting from current and ongoing interim operations, coupled with Bonneville's likely funding of capital-intensive fish infrastructure under the DSEIS, substantially erodes the economic benefits to the Pacific Northwest of hydropower generated at the Willamette dams. In addition, hydropower generation at Willamette dams already takes a backseat to all other authorized purposes. In most cases, hydropower generation is a byproduct of the need convey water to dissipate energy and meet fish operational objectives; therefore, it cannot consistently provide reliable baseload generation that efficiently responds to regional power demands. Taken together, the declining cost-effectiveness and ongoing limited flexibility that would occur under most alternatives, including Alternative 6 in the DSEIS, calls into question whether hydropower production at the Willamette Valley System dams delivers acceptable outcomes for the region, as envisioned when first authorized by Congress. [2] *Pacific Northwest Electric Power Planning and Conservation Act (Northwest Power Act), 16 U.S.C. § 839(2).*	USACE recognizes that the Northwest Power Act requires BPA to maintain an economical and reliable power supply and to protect, mitigate and enhance the fish and wildlife, including related spawning grounds and habitat, of the Columbia River and its tributaries. USACE defers to Congress to determine if the Willamette Valley System dams continue to meet Congressional intent. As with all Federal Agencies, USACE must comply with the ESA and started this NEPA process with that objective. USACE assessed hydropower deauthorization and submitted the WRDA 22 Report to the Assistant Secretary of the Army for Civil Works. The report is still under review by the Administration but it will be provided to Congress as soon as that concludes. The SEIS further analyzes the effects of ceasing hydropower at the Willamette Valley Projects as directed by WRDA 24.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Rachel Dibble, Dorothy Welch	BPA	This DSEIS process lacks the necessary degree of transparency and collaboration to develop a feasible non-hydropower alternative. The Corps has rejected Bonneville's multiple requests to collaborate with the Cooperating Agencies and interested stakeholders to transparently develop an alternative that considers reasonable non-hydropower measures on a dam-by-dam basis. In Bonneville's judgment, the Preferred Alternative (Alternative 5) is not technically and economically feasible because it requires considerable unproven and costly modification of existing dams. The Corps did not utilize the Congressional guidance to fully evaluate alternative designs that would not be constrained by the need to continue hydropower operations. Instead, the Corps unilaterally constructed Alternative 6 as a hypothetical scenario unconnected to the biological objectives of the DSEIS. Bonneville believes that the collaborative consideration of reasonable alternatives evaluating non-hydropower measures on a dam-by-dam basis would provide a more technical and economically feasible alternative. Bonneville is concerned that the lack of a feasible non-hydropower alternative risks the DSEIS falling short of carrying forward for detailed study the reasonable range of alternatives that NEPA requires.	USACE consulted BPA extensively throughout the WRDA report processes and this NEPA process, providing ample opportunities for input on non-hydropower concepts, measures, and ultimately the alternative. USACE submitted the WRDA 22 Report to the Assistant Secretary of the Army for Civil Works in June 2024. The current Administration is reviewing this report and will release it to Congress when the review is complete. USACE is retaining its reading of the language of Section 1326 of WRDA 2024 for the Final SEIS. Congress directed USACE to analyze "an alternative" that "ceases hydropower operations" at the projects. The plain meaning of the Act did not require USACE to analyze numerous additional alternatives when a reasonable range were developed as part of the original EIS. The Act did not instruct USACE to analyze ceasing operations for any other purpose in addition to hydropower, change the amount of hydropower generated at the projects, or select a subset of dams for continued generation. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. Therefore, other options with hydropower removed were not included in the SEIS. Appendix A and Chapter 2.6 of the SEIS include a dam-by-dam evaluation of non-hydropower measures developed for Alternatives 6. In developing Alternative 6, USACE took a reasoned approach in formulating Alternative 6 based on this language and the need to safely operate the dams for the remaining authorized purposes (Appendix A).

Commenter Name	Commenter Affiliation	Comment	USACE Response
Rachel Dibble, Dorothy Welch	BPA	Alternative 6 is not the DSEIS alternative that Congress or the region envisioned. The Corps' narrow reading of language in WRDA 2024 was unhelpful because it resulted in a lack of nuanced or creative dam-specific non-hydropower scenarios. This is a missed opportunity to work with the region to holistically evaluate faster, more cost-effective means to safer passage for ESA-listed fish. The Corps declined to pursue Bonneville's requests to consider realistic dam-specific scenarios, including one that would leave hydropower turbines in place and reclassify hydropower generation from an authorized power operation to an incidental byproduct of the remaining authorized purposes (e.g., fish passage). The Corps considered a partial deauthorization scenario that would maintain generation sufficient for each project's needs and "right sizing" turbines to meet at-project needs while eliminating commercial hydropower production. That approach is neither necessary nor cost-effective. Bonneville questioned the technical merits of these scoping assumptions during previous processes to respond to WRDA 2022, and the DSEIS process did not allow for additional examination of these assumptions during the NEPA analysis process. It is also concerning that Corps staff make public representations about having analyzed the very passage concepts Bonneville sought to evaluate in this DSEIS and determined them infeasible without any documentation or public input. The Corps presented their draft Alternative 6 to cooperators without previously consulting Bonneville, an agency with special hydropower expertise, before screening non-hydropower concepts from further consideration. For example, Bonneville and other stakeholders have not had the opportunity to fully explore the durability of the dam-safety justification appearing in the Corps' description of its DSEIS alternative development process (DSEIS Appendix A, A-28 to A-30).	Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects. USACE used the "plain meaning rule" for statutory interpretation of the text of SEC. 1326 of WRDA 24. Congress directed USACE to analyze "an alternative" that "ceases hydropower operations" at the projects. The plain meaning of the Act did not require USACE to analyze numerous alternatives when a reasonable range was developed as part of the original EIS. This language is a primary driver for the supplement and is discussed numerous places throughout the document including in 2.9. Appendix A provides greater detail and clarity on how Alternative 6 was developed. An alternative "that would leave hydropower turbines in place and reclassify hydropower generation from an authorized power operation to an incidental byproduct of the remaining authorized purposes (e.g., fish passage)" would continue generating hydropower. Under the plain language interpretation of the text of Sec 1326 of WRDA 24, "analyzes an alternative that ceases hydropower operations" means USACE stops generating hydropower and carrying out operations that supported generation. See Section 2.9 Alternatives Considered but Eliminated from Further Review. The comment references a previous study, the WRDA 22 Report to Congress, written outside the WVS SEIS process. Although USACE completed that report and submitted it to the Secretary in 2024, it has not been released to Congress and made publicly available. USACE consulted Bonneville extensively as a part of the report's development because of their role in hydropower transmission and joint funding of the WVS hydropower dams. In the WRDA 22 report, USACE analyzed a "partial deauthorization" scenario that proposed "right sizing" turbines, this scenario was screened from further analysis. Appendix A Section 1.1.4 was updated to clarify these screening justifications. USACE formulated the alternative and provided it the Cooperating Agencies during the preparation of the draft SEIS. This consultation early in the draft SEIS process provided all cooperators with an opportunity to share their special expertise. USACE took input from cooperators into consideration prior to releasing the draft SEIS for public review. Additionally, as the alternative formulation and screening was informed by the prior WRDA 22 Report, USACE consulted Bonneville extensively throughout that process, providing ample opportunities for input on non-hydropower concepts prior to the draft alternative being shared with the other cooperators. Regarding the statement that USACE has not provided stakeholders with "the opportunity to fully explore the durability of the dam-safety justification," USACE provided all Cooperating Agencies with a Preliminary Draft of the Supplemental EIS and all appendices on September 2, 2025, for a 30 day review prior to publication of the Draft Supplemental EIS on November 14. USACE has the jurisdictional purview and subject matter expertise required to perform the dam safety analysis. Scenarios for ceasing hydropower were screen based on a dam safety analysis completed using USACE Engineering Regulation 1110-2-1156: Safety of Dams - Policy and Procedures. The analysis and screening process is described in Section 1.1.4 of Appendix A. The justification was presented of public review.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Rachel Dibble, Dorothy Welch	BPA	Bonneville also reiterates its longstanding concern that the DSEIS continues a problematic pattern of under-representing the impacts on power from EIS alternatives in light of the ongoing interim operations. Interim operations began with the U.S. District Court for the District of Oregon's injunction in the fall of 2021 and immediately reduced generation by as much as 40% on an average annual basis. On short notice and without sufficient consultation with Bonneville or the region, the Corps embedded these operations to be implemented in parallel with the alternatives, including Alternative 6. This approach effectively cements these interim operations into place for decades. The operations have already dramatically reduced the economic viability of Willamette hydropower, now and into the future. The DSEIS assumes these interim operations as a given and because of that, doesn't include them in the characterizations of hydropower impacts within the alternatives. This approach results in an under-representation of the amounts and value of any residual hydropower within the alternatives over the study period.	The SEIS compares all alternatives to the No Action Alternative described in Section 2.10.3. The No Action Alternative is USACE's 2019 operations, representing conditions prior to the 2021 injunction requirements. Figures 3.12.6 - 3.12.12 Monthly Average Generation (aMW) under Alternative 6 and the No-action Alternative in the SEIS depict the differences in power generation between the No-action Alternative (2019 generation), each alternative, and the interim operations. The interim operations are included in the 24 BiOp that was issued to BPA, USACE and BOR. The SEIS Section 3.12.3.2 compares the No-action Alternative (generation in 2019), Alternative 6, and the interim operations. The Draft SEIS Chapter 5 compares all alternatives to the No Action Alternative. Table 5-1. Alternatives Criteria Comparison to NAA represents the impacts to generation as compared to the 2019, pre-injunction conditions.
Rachel Dibble, Dorothy Welch	BPA	In addition to this fundamental disagreement over the Corps' process for developing Alternative 6, Bonneville also believes that several specific DSEIS power and transmission characterizations and analysis areas need to be corrected or clarified for the Final SEIS. Bonneville thus requests the following changes before a Final SEIS is issued: •Bonneville requests that the Corps explicitly summarize in the Executive Summary, Chapter 2, and Appendix A all the concerns that Bonneville has raised regarding the SEIS alternative development process and more thoroughly explain why an alternative that would leave hydropower turbines in place was not carried forward for detailed study in the SEIS.***3*** ***3*** *The 2020 Cooperating Agency Memorandum of Understanding provides, in relevant part, that "the lead agency will summarize any areas of controversy, including issues raised by the Cooperator, in the summaries of the Draft EIS and Final EIS . . . or other appropriate portions of the draft and final EIS."*	USACE updated the Executive Summary to more clearly indicate areas of concern expressed by cooperating agencies throughout the process.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Rachel Dibble, Dorothy Welch	BPA	The DSEIS incorrectly analyzes and characterizes transmission reliability impacts, including "islanding" impacts, which are Bonneville's area of expertise. Bonneville recommends the following changes: o In the executive summary and environmental consequences discussions (Chapter 3), the Corps should add a disclaimer that transmission is beyond the Corps authority, control and responsibility for all transmission impact areas as it has with all the DSEIS's power analysis areas. o In the executive summary on page 8, the Corps should remove the mention of islanding as a primary consequence of Alternative 6. Islanding is also impacted under interim operations and in other alternatives and highlighting islanding as a primary consequence of Alternative 6 above other impacts is inappropriate and misleading. Indeed, the Corps has excluded interim operations from the no-action analytical baseline despite interim operations already limiting islanding capability. o To the extent the Final SEIS retains islanding characterizations, it needs to better clarify that islanding capability is already severely restricted and, at times, physically impossible at present—especially at Cougar dam. Additionally, it must explain that any islanding benefits that occur are a product of circumstance on certain areas of the power system and that the federal government is not obligated to provide this back-up power capability for Blue River and Oakridge under the applicable electrical reliability standards. o Lastly, characterizations around impacts at Cougar and Hills Creek are further misleading because the DSEIS measures an alternative's effects against a No Action Alternative operational baseline frozen in time—before operations under the 2021 injunction, most of which will continue under the Corps' 2025 Record of Decision—and, therefore, the DSEIS overstates the actual nature of the long-term impact of choosing an alternative relative to Interim Operations.	USACE added language to several sections in Section 3.12 in the SEIS to clarify that this benefit is already limited due to current operations and is not a reliability requirement for BPA to meet.
Rachel Dibble, Dorothy Welch	BPA	The Corps should remove assertions related to capacity value and state that they do not have the expertise to fully assess capacity impacts at these regional projects, similar to the approach stated for transmission impacts. While Bonneville notes the Corps made some improvements to the previous characterizations that were in the preliminary DSEIS, the current characterizations still fall short, and it would be best to avoid providing misleading quantitative estimates based on a dated and generic national methodology. The Corps' national methodology significantly overstates the capacity value of these flood risk management projects. The Willamette dams have a limited, non-marketable capacity value that is only available on an ad hoc, case-by-case basis.	While the dependable capacity value of the WVS dams is not marketable due to the nature of the regional energy market and thus does not have a financial value to BPA, USACE maintains that dependable capacity of these dams does have an economic value from a National Economic Development standpoint and is estimated in this SEIS accordingly.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Rachel Dibble, Dorothy Welch	BPA	The Corps should clarify the characterizations of the WRDA language in Chapter 3.12.1 to state that the Congressional directive was to evaluate deauthorizing hydropower operations. The current characterizations conflate ceasing hydropower operations with the concept of ceasing hydropower production via physically reconfiguring the dam. Bonneville believes there is a distinction between deauthorizing hydropower as an authorized purpose (i.e., generation of hydropower for marketing would no longer be a factor in determining project operations) and removing existing hydropower equipment.	Section 3.12.1 now includes a sentence noting Congressional direction to prepare and analyze "an alternative that ceases hydropower operations at the projects." USACE acknowledges the distinction between ceasing hydropower operations and removing existing hydropower equipment. In developing Alternative 6 USACE looked at operational changes that could occur dam by dam, if hydropower operations ceased. However, because hydropower is produced as water moves through the dam for other the purposes there was not a meaningful change to operations not already considered under the other alternatives. Alternative 6, as with all other alternatives, considered life safety requirements and flood risk management as constraints. Appendix A explains why removing existing hydropower equipment is necessary to safely operate the dams for the remaining purposes.
Denver Pugh	Linn County Farm Bureau	Linn County Farm Bureau represents over 450 members who are farmers, ranchers, and agriculture supporters in Linn County. We appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement for the continued operations and maintenance of the Willamette Valley System, namely the late fall/early winter deep drawdown of Detroit Reservoir. We are very concerned the focus for the this drawdown is hyper focused on the wildlife preservation to facilitate juvenile fish passage and not for the preservation of water for agricultural use, fire suppression, or for securing reliable drinking water for many downstream. We feel there needs to be a larger scientific based study that takes into account the economic impact for the loss of acre feet of irrigation water in relation to yield loss due to the lack of water for irrigation. How the drawdown will effect the people relying on that water to filter down to the aquifers that fill many private wells. Research on how having much lower levels impacts the ability to suppress wildfires in the summer. As well as how this drawdown will effect the fish species currently residing in Detroit Reservoir. There are too many communities that reside downstream who rely on these waters and we urge the U.S. Army Corps of Engineers to take a step back and reconsider the assumptions made from the Draft Supplemental Environmental Impact Statement of Detroit Reservoir. Reengage with the stakeholder communities and come up with a better solution that all can benefit from. Thank you for the opportunity to provide comment on this matter.	The proposed Detroit Reservoir drawdown is included in the National Marine Fisheries Service 2024 Biological Opinion. That action is designed to improve passage and access to habitat above Detroit Reservoir to avoid causing irreversible harm to threatened salmon and steelhead populations, until the long-term proposed plan for a structural downstream fish passage system at Detroit Dam is funded and completed, which would trap the juveniles and smolts and truck or bypass them below Big Cliff Dam. Figure 3-1 in Section 3.2.2.3 shows potential effects to reservoir refill from the late fall/early winter drawdown at Detroit. This figure is based on model results and does not show how real-time water management can minimize negative effects to reservoir elevations. The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation. The drawdown operation would end about one month before the normal refill season. The drawdown is not expected to impact refill of the reservoir, except during very dry years as the WVS reservoirs depend on late winter and spring rainfall to refill.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	As cooperating agencies, the Oregon Department of Environmental Quality, Oregon Department of Fish and Wildlife, and the Oregon Water Resources Department appreciate the opportunity to review the draft Supplemental Environmental Impact Statement (SEIS), a document intended to address new Biological Opinion and Water Resources Development Act (WRDA) 2024 requirements following the publication of the Willamette Valley EIS in April 2025. We share the following comments for your consideration. Please consider these comments along with others provided during the cooperating agency review in 2025. General Comments Understanding what actions are included in the Preferred Alternative is challenging. We found it difficult to tease apart extended interim actions from the final actions or measures, despite the helpful inclusion of Table 2-2 listing the Interim Operations. Additionally, we have concerns about the duration of interim operations (Appendix N, Fig. 2-3) until long-term solutions are implemented. This extended timeline increases the need for and importance of adequate monitoring and evaluation, and data-informed adaptive management.	SEIS Section 2.10.4.9 Alternative 5—Preferred Alternative—Refined Integrated Water Management Flexibility and ESA-listed Fish Alternative describes the measures (final actions) for Alternative 5. SEIS Table 2.10-13. Alternative 5 Measures and Locations summarizes the measures, including the interim operations, by dam location.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	We appreciate the incorporation of lessons learned from previous Willamette reservoir deep drawdowns into the planned implementation of the Detroit Reservoir deep drawdown interim operation. Information from monitoring activities and communication and coordination with affected downstream drinking water facilities, year-round water users, and communities will continue to be important throughout the implementation of this interim operation. Figure 3-32 (p. 211) is very helpful for understanding the scale of the Detroit Reservoir deep drawdown compared to that at Green Peter Reservoir.	Thank you for your comments.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	We recommend that USACE include additional information in the SEIS to clarify planned communication, monitoring, and assessment of the deep drawdown operation. For example, the SEIS should detail, specifically, the types of information collected during the Green Peter and Lookout Point drawdowns that were used to inform the proposed approach to implementation of the Detroit drawdown. The SEIS should also identify what types of data will be collected during the Detroit operation and how data and information will be used to inform adaptive management in future years. We look forward to continuing the collaboration with USACE and other entities to implement the deep drawdown operations while minimizing associated impacts.	USACE evaluated elevation data (depth below minimum conservation pool elevation) against turbidity levels along with reservoir temperature data in helping shape the Detroit drawdown operation. The turbidity data gathered and reported in the Biannual status reports was also used to support the water quality analysis in Section 3.5 of the SEIS. This data and the lessons learned from the previous drawdowns at Fall Creek, Cougar, Green Peter and Lookout Point informed USACE's proposal to take a step-wise approach at Detroit. USACE developed an Emergency Response and Communications Plan and would coordinate with North Santiam communities to include them in this plan. This effort is separate from the SEIS process. USACE would use real-time hydrology and turbidity data to modify the operation to improve conditions for fish and reduce adverse impact

Commenter Name	Commenter Affiliation	Comment	USACE Response
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Fish Passage Considerations 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). 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. • The SEIS Preferred Alternative for fish passage at Detroit Dam includes interim operational fish passage via a deep drawdown until a structural solution can be implemented. Any interim and long-term fish passage solution should be evaluated and adaptively managed to ensure effectiveness and to minimize negative effects. *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.*	Thank you for these comments. They will be taken into consideration.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Alternative 6 includes a new adult upstream fish passage facility at Green Peter Dam (section 2.10.4.10). This section should also reference the NMFS 2024 Biological Opinion Reasonable and Prudent Alternative 4.6.2 which includes an evaluation of separating fish at the Foster Adult Fish Facility for release above Green Peter Dam to reduce fish handling.	USACE will address the NMFS Biological Opinion RPA 4.6.2 for an evaluation of separating fish at Foster Dam instead of an additional adult fish facility at Green Peter through the adaptive management process and will do additional NEPA for the action as appropriate.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Please include additional text in the main document to explain why Hills Creek Dam Chinook salmon downstream passage survival estimates provided in Table 3-19 (p. 128) are listed as “N/A”.	Alternative 6 does not include fish passage for Chinook salmon at Hills Creek Dam. Winter steelhead are not present in the Middle Fork Subbasin above or below Hills Creek Dam.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Ceasing Federal Hydropower Operations Ultimately, we would like USACE to have flexibility for how the Willamette Valley System’s dams and reservoirs are managed to provide safe and effective volitional passage and other benefits for fish, to provide a reliable water supply for multiple purposes, and to benefit downstream water quality. The best solution for fish may not preclude 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 and Foster Dam day/night operations). • In addition to the “all or nothing” approach to ceasing federal hydropower operations (or “deauthorization”) in the Willamette basin, a dam-by-dam analysis should be included.	Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. Appendix A and Chapter 2.6 of the SEIS include a dam-by-dam evaluation of non-hydropower measures developed for Alternatives 6.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	This analysis should provide information about costs and benefits of deauthorization at each dam (for fish passage, water quality, water supply, flow management flexibility, short-term and long-term project economic costs, etc.). This is consistent with WRDA 2022 (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.”	USACE assessed hydropower deauthorization and submitted the WRDA 22 Report to the Assistant Secretary of the Army for Civil Works in June 2024 for Congressional consideration. USACE developed Alternative 6 in the draft SEIS based on three scenarios assessed in the WRDA 22 Report to Congress (Appendix A Section 1.1.4).

Commenter Name	Commenter Affiliation	Comment	USACE Response
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Flow Management & Water Supply • Given state expertise and water management authority, we continue to request involvement in the development of new flow management objectives required by the 2024 Biological Opinion.	The new flow management objectives are not part of the SEIS and will be done through a subsequent process.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	The SEIS frequently uses an 80 percent exceedance probability to describe reservoir storage (e.g., Tables 3-38 and 3-39 in the main document). It is unclear why this metric was selected; for example, it would be helpful to clarify if USACE intends to utilize this probability for future water supply agreements or whether the goal is to achieve this level of reliability when filling the reservoirs under the preferred alternative.	USACE selected this value to match the OWRD 80% threshold for issuing water rights.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Clarify whether the peak stored water amounts listed in Table 3-38 (Ch. 3, p. 197) include storage volumes from the power pool. If not, it would be useful to include an additional column to show available acre-feet of power pool storage that is unique to Alternative 6 for comparison to other alternatives.	The storage volumes in Table 3-38 are the volumes in the conservation pool and do not include the volume of the hydropower pools. Section 1.11.2.2 lists the volumes of the hydropower pools.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Comparing changes in water supply and storage between the No-Action Alternative, Interim Operations, the preferred Alternative 5, and Alternative 6 is very challenging, especially within the context of this SEIS. The No-Action Alternative includes the 2008 Biological Opinion flow objectives, as does Alternative 5, Alternative 6, and the Interim Operations, making it difficult to pinpoint the reason for changes in overall storage. For example, the document should include the probability of refill and how it may be impacted by an additional deep drawdown operation at Detroit, comparing that probability to other interim operations, and quantify any potential benefits of using the power pool volumes for other authorized purposes.	The 2008 Biological Opinion flow targets are part of the No Action Alternative, Alternative 6, and Interim Operations (bookended with Measure 30b flow targets). Alternative 5 includes the Integrated Flow Objectives (Measure 30b). It is difficult to pinpoint the exact reason for differences between alternatives as storage is a result of the whole suite of measures in each alternative, including flow objectives.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Detroit deep drawdown operation – Table 3-1 (p. 72) summarizes hydrologic processes for each alternative and notes that Detroit elevations will be lower in the winter because of the deep drawdown and spring refill "may be impeded in years with exceedingly low inflow in late winter and spring." Expanding upon this general statement with some level of probability of refilling Detroit would be helpful for understanding risks and tradeoffs and would also inform goals and objectives for the Forecast Informed Reservoir Operations project.	Non-exceedance graphs for reservoirs and downstream river control points are in Section 3.2.2 of the SEIS. These show the probability of reservoir elevation or river flow in cfs, respectively, on every day of the year. Additionally, Table 3-39 in Section 3.13 lists how full each reservoir fills with an 80% probability, meaning an 80% probability the reservoir would be at least that full.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Interim Operations (Appendix J-Water Supply, p. 86) mentions that the delayed refill at Cougar, fish passage operation at Lookout Point, and the 2008 flow targets would affect available stored water. A statement about whether the Detroit deep drawdown would impact storage refill, and to what extent, would be helpful. As an interim operation and focus of this SEIS, one would expect to see a detailed discussion about the Detroit deep drawdown operation in the water supply analysis appendix.	The Detroit deep drawdown would affect refill of Detroit Reservoir, but only in very dry winters and springs. The SEIS evaluated effects at a programmatic level for a high level comparison of effects across alternatives.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Irrigation Estimates (Appendix J -Water Supply, p. 7) – the irrigation storage allocation discussion about newly converted instream water rights could be improved by mentioning the uncertainty with this irrigation estimate from the Willamette Basin Review study, which provides estimates of water rights that may be at risk. The study acknowledges the potential for regulation and how supplemental sources may come from other supplies beyond stored water. The SEIS discussion should note these as estimates with some uncertainty and some entities “may need” rather than “would need” a secondary source of water.	USACE updated Appendix J to note the uncertainty and changed "would" to "may".
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	In the Alternative 6 description of the Total Dissolved Gas (TDG) Modeling section (3.5.3.1), the document states, "Alternative 6 does not include specific measures to reduce TDG." Please include a brief explanation of any methods that were considered to reduce substantial projected increases to TDG, along with pros and cons of the different methods.	Methods to reduce TDG are discussed in Appendix D, 2.1.2, which includes spill deflectors, flip-lips, or other experimental designs. Additionally, interim operations include spreading spill across multiple spill bays to reduce TDG (Table 2.8-1).
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Section 2.8.6 – Interim Operations should include additional details regarding monitoring and implementation of deep drawdowns: o Include discussion of what chemical and physical sediment characteristics USACE plans to sample, and at what frequency, and discuss any plans to estimate sediment transport rates and volumes during deep drawdowns. o The SEIS should describe how operations during the deep drawdown may be altered during different hydrologic conditions (adequate, dry (deficit), and wet (abundant) water years) and the range of impacts of these operations on temperature, turbidity, harmful algal blooms (HABS), and TDG. o The SEIS should clarify what factors USACE may consider in determining the timing, duration, and stepwise implementation of the drawdown. o The SEIS should include the expected timing (month) and duration of the Detroit drawdown in Table 2-2. It would be helpful if the language and timing descriptions for all deep drawdown operations were consistent across reservoirs. Currently, different information is presented for Green Peter, Lookout Point, Detroit, and Cougar reservoirs.	USACE developed an Emergency Response and Communications Plan and would coordinate with North Santiam communities to include them in this plan. This effort is separate from the SEIS process. USACE would use real-time hydrology and turbidity data to modify the operation to improve conditions for fish and reduce adverse impact. USACE revised the description for Detroit Drawdown to match Lookout Point and Green Peter.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Section 7.2.2 – Effects of Detroit Drawdown should reference USACE plans to coordinate with state agencies and downstream drinking water providers during the implementation of the drawdown.	USACE updated Section 7.2.2 of the Executive Summary to reference the Emergency Response and Communications Plan.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Section 3.19.4.1 – Turbidity should describe the data that will be collected to assess potential impacts of the deep drawdown.	USACE will monitor turbidity levels before, during, and after the drawdown operation.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Appendix C mentions that there are no new hydraulic or sediment models run as a part of this analysis (Section 1.2 Analysis Metrics Summary, Page C-1-3). Are any additional sediment transport models being developed that would inform interim or long-term operations?	No, model development is not required under NEPA. Instead USACE relied on high quality information including the sediment data from the previous drawdowns at Fall Creek, Cougar, Lookout Point and Green Peter, modeling of Alternatives 3A and 3B, and its professional judgement to understand sediment transport and turbidity impacts, and how it could design operations to minimize downstream impacts.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Appendix C should include a written synthesis of the qualitative and quantitative metrics for sediment mobilization and transport, at a minimum comparing resulting values for the Preferred Alternative and Interim Operations to the No-Action Alternative. This synthesis should clarify how these analyses informed selection of a preferred alternative and elaborate on the potential expected impacts of different operations which are currently only presented in tables in this appendix.	Appendix C is a technical appendix and does not included evaluation of metrics. The metrics referenced in this comment are used in Water Quality Section 3.5. This section discusses these metrics in more detail, including comparison across all alternatives in the summary table. Metrics used to identify a preferred alternative are detailed in Chapter 5.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Dam modifications associated with deauthorization of hydropower and interim operations including deep drawdowns may affect mercury dynamics. The SEIS should include specific actions to assess the effects of operations and predict how they might be adaptively managed to reduce methylmercury production and bioaccumulation. Included strategies should align with the 2019 Willamette Mercury Water Quality Management Plan (WQMP) and should be implemented to meet assigned load allocations through control of existing sources of pollution or to offset predicted additional loading due to changes in operations and maintenance.	As stated in Oregon DEQ Willamette Basin Mercury Total Maximum Daily Loads, Section 5.1, "...methylation tends to occur in sediments and the stagnant waters in wetlands and thermally stratified lakes and reservoirs." Deep drawdowns occur in late November and December, a time at which reservoirs have already or are nearing destratification. When reservoirs are destratified, cooler temperatures and fully oxygenated waters are present which decreases the occurrence of mercury methylation by anaerobic bacteria. Further, the timing and forebay elevations of deep drawdowns proposed in the WVS EIS at Green Peter, Detroit, Lookout Point would not lead to reservoir water interacting with wetlands and are planned during periods when anoxic conditions are less likely to occur. The SEIS notes slightly more adverse effects related to mercury on the North Santiam, South Santiam, and Middle Fork Willamette as compared to the NAA. This would be due to deeper drawdown operations exposing bank shoreline and potential increased release of sediment below the dam. More information can be found in the USACE Willamette Basin Mercury TMDL Water Quality Implementation Plan (2025) that has been submitted to Oregon DEQ.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Proposed changes to structures and operations in Alternative 6 and the interim operations should compare potential temperature impacts to the 2024 Willamette Subbasins Temperature Replacement Total Maximum Daily Load (TMDL) load allocations.	Oregon water quality criteria related to temperature at the time of the WVS EIS study are referred to in the results and analysis. The 2024 TMDL was issued after the WVS EIS analysis, but the surrogate measures within that document match closely to the temperature targets that are included in the SEIS as they are both based on pre-dam, free-flowing temperature measurements. The following text was added to Section 3.5: "Between the time in which the Final EIS and this Supplemental EIS were finalized, EPA approved the State of Oregon approved Temperature Total Maximum Daily Loads for the Willamette Subbasins in May of 2025 (State of Oregon, 2025). The notable change for dam owners from the previous TMDL includes a "surrogate measure" to implement load allocations. This surrogate measure is based on the estimated free-flowing mixed temperature of what would exist if the dams were not in place. Temperature targets applied to CE-QUAL-W2 models in the WVS EIS were based on long-term water temperature data records above the dams, which matches the intent of the revised Oregon temperature TMDL surrogate measures. Thus, the updated temperature TMDL load allocations would not result in substantial changes to the relative effects of each alternative compared in this EIS."
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Table 3-8 (Section 3.5.3.1) – Please describe what being within 2 degrees F of the temperature target is intended to represent. Is there a justification for this metric that could be described and/or cited?	Temperature targets included in the 2008 and 2024 NMFS Willamette Biological Opinion are used by USACE for operational temperature management. Other targets based on pre-dam measurements are used and referred to within the WVS EIS. The metric of the numbers of days in which the model result is within 2 degrees F of the target represents the ability of a particular Alternative to meet that target year-round, given that dam releases can be below or above the target depending on time of year, physical constraints of the dam outlets, and other competing authorities governing the use of stored water.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Table 3-9 (Section 3.5.3.1) – This section heading is "Summer Extremes", but Table 3-9 provides yearly output. The table would be more informative and interpretable if it only included the summer months, where the temperature could potentially be exceeded.	The definition of the metric is stated in the table; the results in the table allow for a comparison of the number of days in which 18 degrees C is exceeded. The relative difference between alternatives would not change if the analysis was limited to summer months. This proposed change would not change the effects stated in the EIS.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Angling • Definitive statements regarding the effects of ODFW's kokanee releases into reservoirs are not warranted. Please change: o "…in Detroit reservoir would mitigate…" to "may mitigate." (Section 7.2.2, pg. ES-10) o "Releases of hatchery rainbow trout and kokanee would help maintain sport fishing opportunities..." to "Releases of hatchery rainbow trout and kokanee may help maintain sport fishing opportunities...". (Section 3.8.3.2, p. 132) o "…in Detroit reservoir will mitigate…" to "might mitigate." (Section 3.8.4.1, p. 135) o "Adverse effects…moderated….stocking of rainbow trout and kokanee…". Remove the word kokanee. We do not know whether stocking efforts will be successful or sustained. (Section 3.8.6, Table 3-24, p. 152. NAA column and Alternative 2A column) o "Adverse effects…moderated….stocking of rainbow trout and kokanee…". Remove the word kokanee. We do not know whether stocking efforts will be successful or sustained. (Section 3.8.6, Table 3-24, p. 155. NAA column) o "…in Detroit reservoir will mitigate…" to "might mitigate." (Section 3.11.4, p. 179) o "Future stocking…in Detroit reservoir would mitigate…" to "may mitigate." (Section 3.14.4, p. 203 last sentence in last paragraph).	USACE incorporated the changes except those recommend for Table 3.24 in the NAA column. The NAA represents continuing conditions reflecting recent stocking practices under operational conditions in 2019. Under these conditions stocking of kokanee and rainbow trout have maintained sizable location sport fisheries in WVS reservoirs where these fish are released. Under each alternative USACE recognizes stocking would not result in the same fishing opportunities due to effects on reservoir conditions and downstream fish passage and entrainment. USACE therefore states that deep drawdowns, where they are included in an alternative, would reduce stocking benefits.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Table 6-1 (Appendix E, Section 6.3.1, starting on p. E2-6-4) lacks the formatting of the original table cited in the HGMP which designates the waterbodies that do not include ESA-listed fish. Please update this table to clarify which waterbodies do not include ESA-listed fish.	USACE incorporated these changes for Table 6-1.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Appendix E, Section 6.3.2 Kokanee (starting on p. E2-6-6) should be updated to reflect that at least some kokanee that survived the Green Peter Reservoir deep drawdown returned as sockeye salmon in 2025. Following disease testing, ODFW transported some returning sockeye salmon above Green Peter Reservoir.	USACE updated this section to include the information.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Appendix E, p. E2-6-7. Kokanee are not present in Lookout Point Reservoir. Remove "Lookout Point Reservoir" from the last sentence of the second to last paragraph on this page.	USACE removed reference to Lookout Point.
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	Chapter 3, p. 130 and Appendix E, Chapter 8 – consider updating to reflect recent Pacific lamprey releases above USACE WVS dams.	ODFW and tribal partners released adult lamprey above several WVS reservoirs in 2025. There is no information available on if any spawned and produced offspring and therefore assessing effects of dam and reservoir operations continues to assume lamprey only above Fall Creek Dam for purposes of assessing the effects of the alternatives.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Doug Woodcock, Jennifer Wigal, Tom Stahl	ODFW, ODEQ, OWRD	The success of the actions identified in both the Final EIS and this SEIS will depend on the appropriate research, monitoring, evaluation (RME) and resulting adaptive management of these actions to benefit multiple authorized purposes. We request a role in determining and prioritizing RME associated with the implementation of the EIS and SEIS, and input into decisions affecting adaptive management. As cooperating agencies, we encourage USACE to coordinate with other state natural resource agencies, specifically, the Oregon Parks and Recreation Department, Oregon State Marine Board, and the Oregon Health Authority. These agencies manage state-owned facilities that may be impacted by operational changes at Detroit or may be aware of potential impacts to boating, recreation, and drinking water systems downstream. Thank you again for the opportunity to comment. We look forward to working with USACE and other partners to finalize the supplemental EIS and implement the preferred alternative.	Appendix N includes an adaptive management process with annual reporting as part of the draft SEIS. The State of Oregon, through regular participation by ODFW, OWRD and ODEQ, are part of this process and the ongoing Willamette Action Teams for Ecosystem Recovery (WATER) process. The multiple management and technical team meetings of WATER and the AM Team facilitate coordination and for the State of Oregon to provide recommendations on RME and identify issues important to the State of Oregon and its agencies.
Steve Elzinga	Marion County	On behalf of Marion County, we submit these additional comments regarding the Willamette Valley System Draft SEIS. Careful review and fidelity to federal law is important for protecting all aspects of the environment, especially water quality for Marion County residents. Under 42 U.S. Code § 4332(C), all environmental impact statements must include "a detailed statement" on "reasonably foreseeable environmental effects of the proposed agency action" among other things. The draft SEIS admits that the proposed deep drawdown of Detroit Lake will harm overall fish populations: "Sport fishing in Detroit Reservoir is expected to be adversely affected due to changes in the reservoir habitat conditions and food availability affecting fish growth and survival, and increasing rates of entrainment for resident fish downstream of the dam []. Many entrained resident fish will be injured or not survive passage through the dam. For some species, significant reductions in abundance are possible." SEIS pages 134-135. This is not just speculation: a massacre of over a million kokanee salmon occurred after a 2023 court-ordered deep drawdown at Green Peter Reservoir.***1*** The Army Corps recognized that the deep drawdown directly caused many kokanee salmon to die "from barotrauma, a condition caused by a rapid pressure reduction as fish pass from deep below the surface on one side of the dam to the other side near the surface level. Among divers, this decompression effect is known as 'the bends.'"***2*** ***1*** *An initial Army Corps' 2023 press release said over 8,000 had died. https://www.nwp.usace.army.mil/Media/News-Releases/Article/3553140/deep-reservoir-drawdown-at-green-peter-dam-causes-barotrauma-death-for-thousand/ By 2024, the Army Corps' Willamette Valley Project fisheries biologist was quoted at a public meeting as saying more than one million Kokanee died. https://www.sweethomenews.com/aggressive-deep-drawdown-begins-this-week/* ***2*** *https://www.nwp.usace.army.mil/Media/News-Releases/Article/3553140/deep-reservoir-drawdown-at-green-peterdam-causes-barotrauma-death-for-thousand/*	Under the Endangered Species Act and the 2024 Biological Opinion, USACE is required to take action to improve fish passage for ESA-listed species not sport fish. The drawdown operations are designed to improve downstream fish passage to meet this legal requirement. Studies have shown survival of juvenile salmon and steelhead is higher through spillways and regulating outlets at WVS dams compared to through turbine penstocks. The drawdown is designed to facilitate passage through the regulating outlets. As described in the SEIS, the deeper drawdowns will impact resident fish in the reservoir with significant reductions in some species expected. These reductions would reduce fishing opportunities. However, juvenile kokanee salmon that have passed the other dams during drawdown operations have returned as adult sockeye salmon after foraging in the ocean. The drawdown at Fall Creek has been an effective operation for ensuring juvenile salmon survive their downstream migration, and results demonstrate that this operation has increased adult salmon returns over time compared to pre-drawdown conditions. While this has unfortunately come at the cost of the local fishery for resident fish in Fall Creek Reservoir, the proposed drawdown at Detroit dam is a partial drawdown instead of a stream-bed drawdown like Fall Creek. While substantial impacts to resident fish are expected, they will be less extreme than those observed at Fall Creek or Green Peter due to the size of the residual pool. Section 3.5 also evaluates the amount of TDG that the operation will produce and the effect of that TDG on fish is analyzed in Section 3.8. The analysis in Chapter 3.8 of the SEIS estimates improved downstream passage for juvenile Chinook salmon and winter steelhead from a deeper drawdown in fall of Detroit Reservoir and impacts to the sport fishery.

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Steve Elzinga	Marion County	Above is a screenshot excerpt of a picture from the Army Corps' own press release showing some of the many kokanee salmon killed by the 2023 deep drawdown.***3*** The draft SEIS does not comply with federal law because it fails to sufficiently assess how the proposed action will impact ESA-listed species, including how the admitted harm to overall fish populations will effect ESA-listed species who would otherwise consume those fish. For example, the Grey Wolf is listed as endangered, and the U.S. Fish & Wildlife Service says their range (shown in dark green below) includes the Detroit Lake area:***4*** Multiple studies have shown that Grey Wolves "are opportunistic-generalist carnivores and exhibit considerable dietary plasticity both among and within populations. Previous studies have documented extensive use of a wide variety of foods including birds . . . [and] fish."***5*** Impacts on the endangered Grey Wolf are not analyzed in the SEIS as required by federal law. As such, the SEIS fails to comply with federal law and must be revised. Once this revision occurs, the public should have another opportunity to comment. ***3*** *Id.* ***4*** *https://www.fws.gov/species/gray-wolf-canis-lupus* ***5*** *See, e.g., Watts, et al., The Ilnik wolf Canis lupus pack: use of marine mammals and offshore sea ice, Wildlife Biology, 16(2):144-149 (2010), available at https://bioone.org/journals/wildlife-biology/volume-16/issue-2/09-040/The-Ilnik-wolf-Canis-lupus-pack--use-of-marine/10.2981/09-040.full*	Impacts to ESA listed fish are described in Section 3.5. Impacts to wildlife including ESA species or species of concern in the area of analysis are described in Section 3.9. Observations and studies of Fall Creek Reservoir, where an annual drawdown of the reservoir to streambed occurs, indicated food availability and growth rates for juvenile salmon did not decrease because of the drawdowns. Growth rates observed for juvenile salmonids in recent years after deep drawdowns of Green Peter Reservoir remain relatively high. This data informed the analysis of the Detroit drawdown on food availability for these species. Additionally the lack of listed species as a food source for other fish wildlife are analyzed in Sections 3.8 and 3.9. Gray wolves are not present in the action area, and therefore not included in the SEIS or WVS EIS.
Steve Elzinga	Marion County	On behalf of Marion County, we submit these additional comments regarding the Willamette Valley System Draft SEIS. Careful review and fidelity to federal law is important for protecting all aspects of the environment, especially water quality for Marion County residents. Under 42 U.S. Code § 4332(2)(C), all environmental impact statements must include "a detailed statement" on "reasonably foreseeable environmental effects of the proposed agency action" among other things. The draft SEIS is deficient for many reasons.	Thank you for your comment, it will be considered.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Steve Elzinga	Marion County	1. Insufficient Prioritization of Water Quality and Human Environment The federal Environmental Protection Agency (EPA) recognizes that high turbidity is "often associated with higher levels of disease-causing microorganisms such as viruses, parasites and some bacteria. These organisms can cause symptoms such as nausea, cramps, diarrhea, and associated headaches."***1*** The "action" alternatives fail to adequality address turbidity concerns for hundreds of thousands of Marion County residents. ***2*** The SEIS does not adequately analyze nor prioritize the needs for water quality and protecting the human environment, as required by 42 USC § 4321. Multiple jurisdictions in Marion County use slow sand filtration, which is highly impacted by turbidity. Such slow sand filters would be damaged by the deep drawdown proposal, especially since the fine silt of a deep drawdown is more damaging to slow sand filters than the larger particles of storm-created turbidity. The total collective cost to local governments in Marion County is expected to be millions of dollars to repair, replace, or find alternative water sources, plus preparations will take more time than proposed in the SEIS. A deep drawdown anytime in 2026 or 2027 would be catastrophic. Yet, the SEIS does not even mention impacts on slow sand filters, let alone analyze or weigh such impacts sufficiently. For example, the City of Stayton has a slow sand filter that can be temporarily closed during storm events with high turbidity because it usually has around three days of water storage. However, extended deep drawdowns lasting longer than a few days could not be handled with reserve water and would force the city to either spend significant funds that it does not have or turn off municipal water. That is not acceptable. Further, the SEIS does not include any assurance of monitoring for turbidity at a location far enough upstream from municipal water uses that a drawdown could be paused for unacceptable turbidity (i.e. in pool monitoring). Failure of any of the North Santiam potable water systems can be and must be avoided – recovery of damaged water systems takes months, at extreme costs, and must be part of the SEIS impacts analysis. The SEIS also fails to analyze potential impacts on nearby wells (both public and private) that could be affected by fine sediment in the same river whose water is also going into the aquifer from which the wells draw water. Of the limited alternatives analyzed, only the "no action" alternative protects water quality needs. If the Army Corp believes that some action is needed, additional alternatives must be developed and considered with additional public input opportunity. ***1*** *https://www.epa.gov/ground-water-and-drinking-water/national-primary-drinking-water-regulations* ***2*** *For this reason and all those raised by Marion County, the Army Corps risks violating APA prohibitions against decision-making that is arbitrary, capricious, an abuse of discretion, or inconsistent with the law. 5 U.S.C. § 706(2).*	NEPA is a procedural statute that does not drive the selection of a particular outcome. Water quality impacts including turbidity are detailed in Section 3.5. This analysis is formed by available high-quality information including but not limited to numerous public comments including comments from drinking water facilities; data from the previous drawdowns at Fall Creek, Cougar, Green Peter, and Lookout Point; sediment sampling to analyze cleanliness of the sediment in Detroit Reservoir; and USACE's professional judgment as water managers. The SEIS Section 3.19.4.1 Turbidity was updated in the Final SEIS to discuss impacts to and the limitations of downstream water systems. USACE has engaged with the drinking water providers to better understand potential impacts to downstream drinking water systems. USACE would use real-time hydrology and tubidity data to modify, pause, or cease the operation to improve conditions for fish and reduce adverse impacts downstream. Impacts to water supply are Section 3.13 and Appendix K, Section 3.11 Socioeconomics of the SEIS has been updated to expand on the reasonably foreseeable effects to communities in the North Santiam canyon.

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Steve Elzinga	Marion County	2. Insufficient Analysis of Unique Differences of North Santiam Sub-Basin While the Army Corps can and must learn from the mistakes in other nearby sub-basins like the issues caused by the recent Green Peter Lake deep drawdown, it is problematic to overly rely on information and analysis from other sub-basins without accounting for differences. The North Santiam is a very different sub-basin than all others in the Willamette System. Infrastructure on the system is unique and exponentially less resilient to the impacts of turbidity and sedimentation when compared to other sub-basins. The SEIS fails to properly analyze the unique differences of a deep drawdown in the North Santiam sub-basin.	The SEIS was updated with additional analysis of effects on the North Santiam drinking water facilities (Section 3.19.4.1 Turbidity). USACE modeled the specific hydrologic impacts to Detroit reservoir, and the SEIS analyzed the specific hydrology at Detroit Dam in Section 3.2, that modeling then informed the effects analysis in the remaining sections of Chapter 3 including the water quality section, Section 3.5, the water supply section, Section 3.13, and Section 3.19 Public Health and Safety- Drinking Water.
Steve Elzinga	Marion County	3. Failure to Analyze Sufficient Reasonably Prudent Alternatives There are numerous possible alternatives that would represent potential compromises between the "no action" alternative and the alternatives actually analyzed. Compromise alternatives could, for example, better protect water quality and downstream water uses with: (1) a smaller drawdown delayed and phased in over a longer period of time and (2) a Nephelometric Turbidity Unit (NTU) turbidity cap with NTU levels monitored at multiple locations (including both inpool and at reasonable distances upstream from municipal water intakes) and an immediate pause in drawdowns immediately upon NTU levels exceeding scientific best practice levels.***3*** Municipal water uses are working to align funding and adapt infrastructure to become more resilient but such improvements take time, and communities need time to adjust to potential impacts. Delay or other mitigation is warranted. Any changes must be very incremental, should involve written action plans for real-time collaboration with local governments, utilities, and the Oregon Health Authority, with clear, pre-impact anticipatory "off-ramps" objectively defined to avoid damages. Failure to fully analyze and consider such compromise alternatives and allow public input on more alternatives makes the entire SEIS deficient. ***3*** *Notably, the Army Corps should consult EPA turbidity research and rules on turbidity limits for public water systems. See, e.g., 40 CFR 141.71-141.73 and https://www.epa.gov/dwreginfo/turbidity-provisions.*	The SEIS analyzes a reasonable range of nine alternatives. Chapter 2 and Appendix A describe the development of the range of reasonable alternatives. The Detroit drawdown proposed in the SEIS takes a slower approach with additional mitigative measures for downstream communities. The SEIS has been updated to include additional analysis of effects on the North Santiam drinking water facilities (Section 3.19.4.1 Turbidity). USACE will use real-time hydrology and turbidity data to modify, pause or cease the operation to improve conditions for fish and reduce adverse impacts downstream. Additionally, the SEIS has been updated to expand on the reasonably foreseeable socioeconomic effects to communities in the North Santiam canyon (Section 3.11 Socio-economics). USACE developed an Emergency Response and Communications Plan which will lay out the process for real time collaboration with North Santiam communities, ODEQ, and OHA. This effort is separate from the SEIS but the process was disclosed for public comment.

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Steve Elzinga	Marion County	4. Failure to Coordinate with Local Governments The development of the draft SEIS does not meet the requirements for coordination with local governments under 42 USC §§ 4331 and 4332, 40 C.F.R. §§ 1501.1, 1501.2(4)(ii), and 1501.7(a)(1),***4*** as well as under other rules, laws, and the federalism principles in the Tenth Amendment to the US Constitution. The Army Corps did not sufficiently consult with local governments along Detroit Lake and the Santiam River, such as Marion***5*** and Linn Counties, the Cities of Salem, Stayton, Sublimity, Turner, Jefferson, Mill City, Gates, and Detroit, and water districts. Each local government should have been specifically invited to be coordinating agencies at each stage of the SEIS development process and provided a draft of the SEIS for preliminary comment prior to finalizing the draft for public release. It is similarly insufficient for the SEIS Section 1.6 to simply incorporate by reference the coordination section from the EIS since the coordination needs are different for the different purpose of the SEIS. Additional consultation would have flagged that alternatives like those above needed to be analyzed. ***4*** *Although the statutes are still in effect, the CFRs were repealed in April 2025. Since this SEIS and the EIS it modifies were started prior to CFR repeals, these rules are still relevant to this SIES.* ***5*** *Marion County is substantially affected by not being properly consulted on the SEIS and, if it was not already abundantly clear based on multiple comment letters and informal outreach, Marion County hereby requests substantive consultation under NEPA and all applicable rules and laws. Marion County also specifically requests to be provided a copy of the preliminary final SEIS for review before it is finalized and publicly released.*	42 USC § 4336a(a)(3) states that a Federal Agency may designate a local agency as a cooperating agency. Further, 42 USC §§4331 and 4332 do not require that each local government be consulted individually as part of the NEPA process. Instead, it requires that if a local agency responsible for developing and enforcing environmental standards provides comments, then those comments will be made available and accompany the document through the agency review process. Chapter 6 details the outreach related to the NEPA process including how it publicly notified those impacted and solicited their input. It will consider and include all 3 comment letters from Marion County in the SEIS along with any comments submitted by other local communities for the decision maker to consider. Since the 2024 Biological Opinion was released and throughout the NEPA process, USACE has met with several of the named local governments at several levels of its organization, Portland District staff and USACE Headquarters have met numerous times with Marion County to hear their ideas and concerns and will continue to do so even after the NEPA process ends. The SEIS commenced on May 16, 2025.
Steve Elzinga	Marion County	5. Failure to Sufficiently Analyze Recreation Impacts The Army Corps tracks and reports data about value of recreation specific to Detroit Lake. See attached Army Corps report pulled from the Army Corps website just last week with data from 2023. The SEIS fails to adequately analyze the recreation impacts of a deep drawdown and does not even fully consider the data that the Army Corps itself collects and reports. Further, the SEIS fails to recognize the massively different recreational impacts between the proposals in the EIS and the SEIS.	A detailed analysis of recreation impacts can be found in Appendix K. The values of recreational opportunities at USACE projects are calculated using enterprise-wide recreational Unit Day Values (UDVs). Analyses in Appendix K use fiscal year 2025 UDVs, these values are the same across all USACE projects – including Detroit Reservoir. UDVs are assigned based on a system that scores recreational opportunity. Scores are calculated between 0-100. Appendix K analyzes changes in visitation under each alternative compared to the no action alternative, and changes in the value of recreational opportunities under each action alternative compared to the no action alternative. Data on visitations to each project come from the USACE Visitor Estimation and Reporting System (VERS) database and are supplemented with non-USACE campground visitation data. Available data is not specific enough to analyze individual recreational activities at each reservoir year-round, so the analysis assumes that boat ramp access is the sole factor influencing changes in recreational usage of each project. In this way, data constraints are compensated for. Each of the Action Alternatives 1-6, the No Action Alternative, and the Interim Operations plan (NTOM) are fully analyzed in Appendix K.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Steve Elzinga	Marion County	6. Inconsistency with Army Corps Mission All the alternatives other than the “no action” alternative do not respect the core principles of the Army Corps’ mission and goals: statutory, regulatory, and otherwise, such as “maintaining America’s infrastructure,” “energizing the economy,” and “providing recreation opportunities.”***6*** ***6*** *https://www.usace.army.mil/About/CampaignPlan.aspx*	Thank you for your comments. They will be taken under consideration.
Alan Hanson	Oregon State Marine Board	The Oregon State Marine Board is charged with regulating and promoting recreational boating in Oregon for a safe and enjoyable experience. We serve the recreational boating public through the watercraft regulation process, education programs, financial and engineering assistance to access providers, coordination with marine law enforcement, and several environmental programs. We also develop and evaluate boating rules to promote safe operation and impacts to other waterway users, aquatic shoreline environment, cultural resources, and other social concerns are minimized. Detroit Reservoir is a popular destination for year-round recreational boating. On cool summer morning the lake is filled with fisherman looking to catch the abundant rainbow trout and kokanee. As the day warm up the fishermen leave to clean their catch as the day cruisers and towed water sport enthusiast start their day on the lake. As families return to the shore for diner, the evening crowd will enter the lake to watch the sunset and take the final run of the day or catch the last fish. During this time, the marinas and campgrounds are fully to capacity. The nearby communities are busy pumping gas, bagging groceries and serving meals. The is a time of abundance that the local communities rely on the influx of visitors. This is a community that once thrived on the logging industry but now rely on recreational tourism. This community has been hit hard in past years when the lake was unable to fill and wildfires wiped out large portions of the community. The deep drawdowns threaten to create a new hardship for the community. Each spring the surrounding communities hold their breaths waiting to see if the lake will fill and the tourist will return. As the weather patterns change, they have to hold their breaths a little longer. With an additional 55 feet of drawdown, the reality is that each year, it will become more challenging to fill the lake. This will cause hardship for working families that rely on the prosperity of summer and a full lake. While the deep drawdown at nearby Green Peter Reservoir has been good for this community in the short term, it rings alarm bells knowing the devastation that befell the South Santiam communities as a result of the drawdowns.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Alan Hanson	Oregon State Marine Board	While summer is a boon for the North Santiam communities, the winter is a favorite for fishermen. Detroit is an outstanding fishing opportunity for kokanee. With the loss of the kokanee population in Green Peter, Detroit is the mecca for Kokanee fishermen. Most days of the week, the winter boat ramp will always have 2 to 20 trailers parked. There is always chatter on social media to see where the fish are and if the winter ram is accessible. The proposed deep drawdown will make that ramp inaccessible for a substantial portion of time. The Corps is relying on traditional weather patterns to quickly fill in the lake after the draw downs, but again, weather patterns are changing and historic weather patterns should not be an indication of the future. The winter boat ramp was built in partnership with several state and local agencies to invest with in its installation, with the support that the Army Corps. would continue to manage the lake so that the ramp would be accessible. If the Army Corps wants to change its management, they need to develop a plan to provide alternate access to the lake and be prepared to implement it at the first drawdown to mitigate the recreational opportunities that it is proposing to remove.	Appendix K evaluates impacts to recreation. A detailed analysis of water levels and how they could affect boat ramp access and recreation opportunities under each alternative are there. Figures 1-2 through 1-6 in Appendix K show the predicted range of water levels under different precipitation scenarios across the entire year at Detroit reservoir under each action alternative, the no action alternative, and interim operations. The elevations of each boat ramp at Detroit Reservoir are included in these graphs. Under interim operations during the median expected water year, the Mongold boat ramp would be unavailable from approximately the beginning of December through early/mid-January. This period is the least busy fishing period at Detroit Reservoir according to analyzed data. Only in extremely dry years (the bottom 5% of water years) is it expected that the interim operations plan would significantly impact boat ramp access during the remaining 10-11 months out of the year. In these years, access would be severely diminished across all alternatives considered and the impact would not be uniquely caused by the deep drawdown. A phased, gradual implementation of the proposed deeper drawdown of Detroit with constant water quality monitoring would reduce the risk of releasing high turbidity water downstream. Although there could still be significant impacts to the kokanee fishery, a late-fall drawdown schedule would help reduce impacts on both the kokanee fishery and the peak summer recreation season, thereby reducing economic disruption. Taking action to improve fish passage at Detroit is not discretionary but a legal requirement under the Endangered Species Act. The proposed Detroit drawdown operation was included in NMFS 2024 Biological Opinion as an operation to improve downstream passage for juvenile salmon until a long-term proposed structure for downstream fish passage is funded and completed.
Robyn Roark Morley	Independent Citizen	Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for continued operations and maintenance of the Willamette Valley System (WVS). As full-time residents of Salem, Oregon, and property owners in Detroit, Oregon, we have carefully reviewed the Draft SEIS and are deeply troubled by the significant negative impacts it may cause. The potential consequences described in the Statement are alarming and warrant serious consideration, as they will affect many individuals and communities in the region. We write to express strong opposition to the proposed alternatives, including the Preferred Alternative (Alternative 5), and in particular the inclusion of the late fall/early winter deep drawdown of Detroit Reservoir to elevation 1395 feet, which will have serious adverse consequences for drinking water systems, recreation, the Kokanee fishery, and the broader Santiam Canyon economy. The SEIS fails to adequately characterize these and does not demonstrate that the Preferred Alternative will meaningfully benefit ESA-listed fish populations. Our concerns are outlined below.	Taking action to improve fish passage at Detroit is not discretionary but a legal requirement under the Endangered Species Act. The proposed Detroit drawdown operation was included in NMFS 2024 Biological Opinion as an operation to improve downstream passage for juvenile salmon until a long-term proposed structure for downstream fish passage is funded and completed.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Judith Marshall	Independent Citizen	GENERAL COMMENTS Execution of the National Environmental Policy Act (NEPA) -My comments to the Willamette Valley System Draft Programmatic Environmental Impact Statement (WVS PEIS) (Corps, 2022) are the same as submitted on February 23, 2023. Section 1.12.8 2024 Water Resource Development Act ... , wants an alternative that ceases hydropower operations at the projects	Congress directed USACE to analyze an alternative that ceases hydropower operations at the projects. Section 1326 of WRDA 24 does not include Congressional reasoning or intent for this provision.
Judith Marshall	Independent Citizen	Section 2.4 Purpose and Need The purpose and need seems a bit dated. "The purpose and need for the continued operations and maintenance of the WVS is to operate the system in accordance with the eight Congressionally authorized purposes and in compliance with the ESA and all other applicable treaties, laws, and regulations ... " I think it would be more relevant to discuss why or if these eight Congressionally authorized purposes are needed.	The continued operation and maintenance of the WVS is the Federal action, which is predicated on the continued existence of the Congressionally authorized purposes though operating outside of current authorities was considered in detail. A different effort like a planning study would allow Congress to reevaluate all purposes which is a different effort than a compliance effort like NEPA for the continued operation and maintenance of the WVS.
Judith Marshall	Independent Citizen	I am having trouble understanding the effects of Power Generation and Transmission later in Section 3.12. Is there a need for hydropower generation & transmission on the WVS, and how would this be affected with implementing Alternative 6?	There is existing hydropower generation and transmission on the WVS. Alternative 6 would eliminate all generation at these dams, which would need to be replaced with additional generation at a different generating resource. Additionally, the dams would need a replacement source of power, as they currently run off the hydropower generated by the dam. The estimated generation loss is shown in Table3-34.
Judith Marshall	Independent Citizen	Section 2.8.6 Interim Measures This SEIS states, "The Detroit drawdown operation was developed based on lessons learned from previous drawdowns at Green Petroleum and Lookout Point reservoirs ... " Please state what these lessons are.	USACE updated Section 2.8.6 to clarify this statement.
Judith Marshall	Independent Citizen	2.10 Alternatives Considered in Detail and the Preferred Alternative "This section is incorporated by reference with the following clarification related to Alternative 6: Alternative 6 does not meet the purpose and need for this statement because it formally analyzes eliminating hydropower, eliminating the hydropower authorization at the projects (Section 2.4)." The purpose and need does not give the why of each of the authorized uses and why Congress wants an evaluation of the WVS operating without hydro power.	The purpose and need is related to the purpose and need of the EIS, not to the authorized purposes of the dams. Congress did not include the reason for its direction to analyze ceasing hydropower operations but not including operations for the other purposes listed in WRDA 24.
Judith Marshall	Independent Citizen	3.5.3.1 Methodology for Total Dissolved Gas Modeling It is not clear to me why Alternative 6 result in significant increases to TDG levels although, “Alternative 6 does not include specific measures to reduce TDG.” Why are there no specific measures to reduce TDG?	TDG measures were not included as they are not required for ESA compliance.
Judith Marshall	Independent Citizen	3.5.3.2 Alternatives Analyses - Alternative 6 Table 3-10 shows that the WVS cannot operate without exceeding the water quality limits for TDG for all the alternatives.	Thank you for your comment. It will be taken into consideration.
Judith Marshall	Independent Citizen	Review - The review of the SEIS is a real burden to the public who wants to understand the deep drawdown at Detroit and Alternative 6 - ceasing hydropower generation. It required so much back-referencing that it was very cumbersome and really requires a desktop computer with several screens.	Thank you for your comment. It will be taken into consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Judith Marshall	Independent Citizen	Turbidity Downstream of Detroit with Deep Drawdown. What I could not find however, is the downstream turbidity effects of the deep drawdown at Detroit and the Corps' status of obtaining approval from the Oregon Department of Environmental Quality (ODEQ) under the Clean Water Act. I understand that ODEQ plans to "…penalize the Corps for violating environmental law." ***1*** Does the Corps anticipate approval from ODEQ for TDG, temperature and turbidity exceedances by the proposed action. I also could not find in text or appendices the status of compliance under the Clean Water Act per Corps Regulatory Guidance Letter, No. 05-4, August 19, 2005. The SUBJECT of this guidance letter is: Guidance on the Discharge of Sediments From or Through a Dam and the Breaching of Dams for Purposes of Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899. ***1*** *Per the article from the Capital Press on February 29, 2024, "Muddying the Waters:…"*	Turbidity data and analysis related to the Detroit Drawdown is in Chapter 3 Section 5 Subsection 3 (3.5.3). Compliance with applicable laws will be detailed in the ROD. USACE does not issue permits to itself via the Regulatory Program if Section 404 of the CWA is triggered.
Judith Marshall	Independent Citizen	Please be Aware of 40 CFR 1506.1 (c) (c) While work on a required programmatic environmental review is in progress and the action is not covered by an existing programmatic review, agencies shall not undertake in the interim any major Federal action covered by the program that 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 review; and (3) Will not prejudice the ultimate decision on the program. Interim action prejudices the ultimate decision on the program when it tends to determine subsequent development or limit alternatives. This is important because I am not sure what is the baseline, the NAA with the interim measures or just the NAA or how the placement of cobbles at Big Cliff Dam are baseline or about to happen. Why not include it all?	The Council on Environmental Quality's regulations were removed prior to the start of the Supplemental EIS. USACE complied with the National Environmental Policy Act and USACE's implementing regulations at 33 C.F.R. Part 230 in preparing this Supplemental EIS. The No Action Alternative is defined in Chapter 2. See Chapter 2 Section 10 Subpart 4 for the measures analyzed as part of the No Action Alternative (NAA). The NAA does not include the interim operations or the Big Cliff TDG abatement structure because they weren't part of the conditions or operations in 2019 when the EIS began.
Judith Marshall	Independent Citizen	effects discussion of implementing Alternative 6. This is still needed.	NEPA requires federal agencies to consider reasonably foreseeable environmental effects. 42 USC 4432(C)(i). These effects are identified and described in Chapter 3 of the SEIS.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Judith Marshall	Independent Citizen	I support de-authorization of hydropower in the Willamette Valley hydropower project (WVP). The economics don't support it, traditional operations of turbines in the eight of the thirteen dams on the Willamette result in water pollution; incidental oil spills; increased water temperatures downstream, and increased adverse effects to UWR spring Chinook and winter steelhead. The Corps culture does not value the natural and cultural environment or laws for their protection. This culture prevents the Corps doing from what is required of them or what they should do to help recover these imperiled species. This has included repeated violations of the ESA and NEPA in the WVP I think by de-authorizing hydropower on the WVS, the Corps would not be able to claim need to do actions that are causing extinction to these imperiled UWR spring Chinook and winter steelhead. The public has not been notified of the change in effects of Corp operations since 2000 with the ESA listing of the UWR salmon and steelhead and in 2008 with the NMFS' established requirements in their biological opinion to the Corps with conditions to avoid jeopardizing the continued existence of these two anadromous species as is required under ESA. Implementing the BiOp The Corps did not give the general public to comment on NMFS' effect determination to ESA-listed UWR Chinook salmon and winter steelhead with the Willamette Basin Review (WBR) as is required under NEPA. This was the most significant issue and resulted in another no-jeopardy opinion on top of the 2008 determination for the WVP, the Corps analyzed a new preferred alternative and gave only a selected portion of the general public the opportunity to review it. Only the stakeholders, not the whole general public, were given opportunity to comment on these new significant changes. This violates NEPA regulations at the time WBR This lack of transparency and protection of federally-recognized significant resources reduces my trust in the Corps to do the right thing under these laws and seeking public input. Therefore, I support de-authorizing hydropower and stopping the Corps from using exorbitant amounts of taxpayers' money to build another engineering solution that creates more environmental problems. I think the species that are listed as protected under ESA would receive greater protection as they deserve.	Thank you for your comments. Willamette Basin Review had a separate NEPA process from this effort. However the outcome of Willamette Basin Review was incorporated in the operations in the alternatives so the public could comment on the effects of Basin Review on operations like flows.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	Please consider the following comments from Willamette Riverkeeper and Cascadia Wildlands concerning the U.S. Army Corps of Engineers' (Corps) Draft Supplemental Environmental Impact Statement (SEIS) for the Willamette Valley System (WVS). More than one million Chinook salmon and steelhead once returned to the Willamette River Basin, and there once was a robust population of bull trout. Over the last hundred years, with the 1938 authorization of the Willamette Valley System,***1*** the effects of flood control and hydropower operations and resulting loss of habitat have driven steep declines in these fish populations in the Willamette Basin.***2*** These collective pressures contributed to the listing of bull trout under the Endangered Species Act in 1998, and the listing of Upper Willamette River spring Chinook salmon and steelhead under the Endangered Species Act in 1999, as explained in our February 2023 comment letter on the WVS Draft Programmatic Environmental Impact Statement.***3*** In 1980, the Corps created the first programmatic EIS for the Willamette Valley System. Soon after, Upper Willamette River Chinook Salmon, Upper Willamette River steelhead, and bull trout were listed as federally threatened species under the Endangered Species Act. In the twenty-seven years since these species were listed, the Corps has neglected to prioritize the survival of these threatened species, and the continued operation of the Willamette Valley System has put them at greater risk of extinction each year. According to NMFS's 2024 Status Report on Upper Willamette River Chinook salmon and steelhead, "[c]limate change modeling predicts that in the absence of passage to colder headwater areas, some populations would be at a high risk of extinction by 2040." ***1*** *The primary purpose of the Willamette Valley Project dams is flood control. According to the USACE Portland District website, "Portland District's highest priority is ensuring the Corps' dams are fully able to reduce flood damage to downstream communities on the Willamette and Rogue rivers, and that the Columbia River dams continue to safely function as designed."* ***2*** *See NOAA Fisheries, Upper Willamette River Chinook Salmon Recovery Plan, https://www.fisheries.noaa.gov/west-coast/endangered-species-conservation/upper-willamette-river- chinooksalmon#:~: text=The%20Upper%20Willamette%20River%20Chinook,under%20the%20Endangered%20Species%20Act.* ***3*** *Commenters incorporate by reference the comment letter Willamette Riverkeeper, Cascadia Wildlands, Center for Biological Diversity, and Oregon Wild submitted to the U.S. Army Corps of Engineers on February 23, 2023, on the Willamette Valley System Draft Programmatic Environmental Impact Statement.* **4** *2024 5-Year Review: Summary & Evaluation of Upper Willamette River Steelhead and Upper Willamette River Chinook Salmon, NMFS West Coast Region (2024), at pg 20.*	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	Willamette Riverkeeper and Cascadia Wildlands (Commenters) have concerns about the Corps' draft SEIS and the Corps continued preference for Alternative 5. Alternative 6 does not reflect a genuine effort by the Corps to truly consider decommissioning hydropower at the Willamette Valley Project (WVP) dams, and the instance of continuing with Alternative 5 does not meet the Corps' statutory obligations under the Endangered Species Act to ensure that the Willamette Valley System does not jeopardize listed species. Commenters strongly urge the Corps to conduct a more thorough analysis of decommissioning hydropower at the dams and to truly consider this as a viable option that will make the Willamette River more resilient in the face of climate change.	Alternative 5 was USACE's preferred alternative in the Draft SEIS, however, USACE may select to implement any action in the SEIS that has been sufficiently analyzed. NEPA does not require a specific outcome because it is a procedural statute. Alternative 6 is a genuine effort to analyze how to safely operate the Willamette Valley Projects if USACE stopped operating for hydropower. Congress passed a provision in WRDA 24 that required USACE to formally analyze an alternative that ceases hydropower operations at the WVS projects. USACE used the plain language of Section 1326 of WRDA 24 and public comment to scope the additional alternative include the Final SEIS. Congress directed USACE to analyze "an alternative" that "ceases hydropower operations" at the projects. The plain meaning of the Act did not require USACE to analyze numerous alternatives when a reasonable range had already been developed and analyzed.
Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	Alternative 6 does not reflect a genuine effort by the Corps to evaluate the end of hydropower at the Willamette Valley Project dams. Congress was clear in the Water Resources Development Act of 2022 and again in 2024, directing the Corps to "carry out 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, of the Willamette Valley hydropower project."***5*** Yet the Draft Environmental Impact Statement failed to analyze what decommissioning hydropower would entail. That omission is exactly why this Supplemental Environmental Impact Statement is necessary. It is clear, Alternative 6 is the Corps begrudgingly going through the motions to appease Congress, with no openness or intent to actually end hydropower as requested. The Corps purposefully wrote Alternative 6 to make Alternative 5 seem like the only reasonable option but failed to consider the many benefits that can come from decommissioning hydropower at the dams. Unlike other policy areas, there is a unique consensus on decommissioning hydropower at the dams: the State of Oregon, the Bonneville Power Administration, utilities, environmental nonprofits, and tribal nations all agree that this is the best solution to meet the Corps' ESA obligations. A spokesperson for the Eugene Water and Electric Board explained, "[w]e already know that the Willamette Basin projects are the least efficient hydropower resources in Bonneville Power Administration's portfolio… Changing how they operate will have benefits for fish and wildlife, while saving money for publicly owned utilities."***6*** Despite this, the Corps continues to insist that hydropower generation is needed at the dams and refuses to genuinely consider decommissioning hydropower at the Willamette Valley Project. The Corps needs to go back to the drawing board and write additional, more robust, alternatives that include decommissioning hydropower at the dams. ***5*** *(WRDA 2022, Section 8220).* ***6*** *Army Corps misses key deadline to report to Congress on ending Willamette hydropower to save salmon, Oregon Capital Chronicle (July 12, 2024), https://oregoncapitalchronicle.com/2024/07/12/army-corps-misses-key-deadlineto- report-to-congress-on-ending-willamette-hydropower-to-savesalmon/#:~: text=Instead%20of%20ending%20hydropower%20and,money%20for%20publicly%20owned %20utilities.%E2%80%9D.*	USACE respectfully disagrees with the characterization that "Alternative 6 is the Corps begrudgingly going through the motions to appease Congress, with no openness or intent to actually end hydropower as requested." Congress asked USACE to analyze the impacts of ending hydropower operations from the Willamette Valley System. Congress has the sole authority to deauthorize (end) hydropower. USACE assessed hydropower deauthorization and submitted the WRDA 22 Report to the Assistant Secretary of the Army for Civil Works in June 2024 for Congressional consideration. USACE developed Alternative 6 in the draft SEIS based on three scenarios assessed in the WRDA 22 Report to Congress (Appendix A Section 1.1.4) and used the "plain meaning rule" for statutory interpretation of the text of SEC. 1326 of WRDA 24. Under the plain language interpretation of the text of Section 1326 of WRDA 24, "analyzes an alternative that ceases hydropower operations" means USACE would stop generating hydropower and operations that specifically supported generation. This language is a primary driver for the supplement and as such is discussed throughout the document, including in Section 2.9 of the SEIS. Chapter 2 describes why the nine alternatives analyzed in the SEIS represent a reasonable range of alternatives and references the reader to Appendix A for greater detail and clarity on how Alternative 6 was developed (Section 2.9 Alternatives Considered but Eliminated from Further Review). USACE added language to clarify why hydropower deauthorization would not provide greater flexibility to operate for fish passage (Section 2.9 and Appendix A).

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	I. The SEIS does not reflect a good faith effort by the Corps to consider decommissioning hydropower at the dams. Alternative 6 failed to consider all the benefits that could come from decommissioning hydropower at the dams and instead looked only at potential negatives, making them seem larger than they are. For example, the SEIS states, “Alternative 6 is expected to have adverse effects on hydropower generation and increase construction costs.” The Corps did not consider the construction costs associated with maintaining the hydropower infrastructure or the cost of power generated by these dams, which operate at a loss annually. The SEIS also fails to meaningfully evaluate cumulative, basin-wide ecological impacts of operating the Willamette Valley Project as an integrated system rather than as a collection of individual facilities. Water temperature, sediment transport, and floodplain connectivity are affected by the combined operation of all dams, yet the SEIS does not assess whether incremental improvements at one site are negated by continued barriers, altered flows, and thermal loading elsewhere in the basin. Without a system-level ecological analysis, the Corps cannot determine whether its preferred alternative will actually avoid jeopardy to listed species or meaningfully improve long-term watershed resilience. The Corps an unknown amount every year to keep the hydropower infrastructure running. As seen in documents received by Willamette Riverkeeper in response to a 2021 FOIA request, the Corps regularly needs to repair turbines and other hydropower infrastructure as these dams age. These costs are not small. Considering only one dam decommissioning alternative is a failure by the Corps to consider all possible options to help fish, improve ecosystems, and maintain the main purpose: flood control. Alternative 6 includes the complete removal of hydropower infrastructure and then goes on to replicate the Corps’ preferred alternative, Alternative 5, which includes “proposed structural changes [that] are both massively expensive and speculative in their biological benefits for endangered species.”***7*** This utterly fails to meet the intent of Congress when it directed the Corps to study ending hydropower in the Willamette Valley System. We need the Corps to conduct a dam-by-dam analysis that includes options such as leaving hydropower infrastructure in place without generating commercial hydropower. Each dam has different power output, retrofit costs, purposes, and species that may be impeded by these structures. There is no one-size-fits-all option; every dam is different. This analysis is needed to ensure that fish recovery happens as quickly and efficiently as possible. The Corps needs to go back and consider other dam decommissioning alternatives in order to make a good faith effort to follow Congress’s directives. *U.S. Army Corps of Engineers November 13, 2023, listening session, https://wholecommunity.news/2023/11/21/bpa-ppc-residents-discuss-future-of-willamette-valley-hydropower/ (hereinafter “Listening Session”).*	Alternative 6 has more expensive construction costs because it requires the decommissioning of hydropower equipment. The construction costs associated with maintaining the hydropower infrastructure were considered in the net present value calculations included in the FEIS which were incorporated by reference into the SEIS. The SEIS considers the impact of decommissioning hydropower, while also implementing the preferred alternative. NEPA requires agencies to consider reasonably foreseeable effects which are described in Chapter 3 of the SEIS. 42 USC 4332. This includes system wide impacts on water quality and vegetation. USACE is retaining its reading of the plain language of Section 1326 of WRDA 2024 for the Final SEIS. Congress directed USACE to analyze "an" alternative that "ceases hydropower operations" at the projects. The plain meaning of the Act did not require USACE to analyze numerous additional alternatives when a reasonable range had already been developed as part of the original EIS. The Act also did not instruct USACE to analyze ceasing operations for any other purpose in addition to hydropower, change the amount of hydropower generated at the projects, or select a subset of dams for continued generation. This was a clear directive to analyze a single alternative that ceases hydropower operations at all the WVS projects. Therefore, other options with hydropower removed were not included in the SEIS. Appendix A and Chapter 2.6 of the SEIS includes a dam by dam evaluation of non-hydropower measures developed for Alternatives 6.

Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	II. The Willamette Valley Project hydropower is too costly to continue to operate. Willamette Riverkeeper currently has a FOIA request pending with the Corps requesting economic analyses and other documents related to any actions and studies the Corps has conducted regarding decommissioning hydropower at the Willamette Valley Project. After much back and forth, this request was perfected on June 23, 2025. Six months later, and the Corps has not even come up with an estimated timeline for getting this information to . The Corps' lack of transparency around this is concerning, and without this information, Commenters cannot be thorough in our analysis of the proposed alternative, but can confidently say, based on publicly available documents, that continuing hydropower at these dams will create a net loss financially.The total maximum generating capacity at the Willamette Valley Project is 495 megawatts, but "due to variations in water supply the annual energy output of these dams is lower, averaging 184.4 MW of hydropower for an average water year, or enough power for about 138,000 homes."***8*** This is in direct conflict with the Corps' own claims that the WVP dams "generate hydroelectric power, enough for approximately 300,000 homes."***9*** The eight dams that generate hydroelectricity contribute "less than 4% to the average power generation for the entire Federal Columbia River Power System."***10*** With the proposed drawdowns and other fish passage measures, the Willamette Valley Project will likely generate even less power over the coming years.The WVP dams produce power at a huge cost, with BPA estimating the cost to be $30,83 per MWh over the next 30 years "before any additional fish mitigation measures are constructed or implemented."***11*** BPA noted that "[a]ny additional fish mitigation measures would drive the cost to generate power from the Willamette dams even higher."***12*** The cost of this hydropower means that there is less capital for BPA to spend on grid hardening, wildfire resilience, and transmission upgrades for renewables. The Corps has no way of lowering these costs, and instead, the costs continue to increase. BPA states that to remain cost competitive, the levelized cost of generation must remain "at or near $11 per MWh." At a public hearing, the Public Power Council (PPC) explained that it "has long expressed concerns about the economic vitality or viability of power generation at the Willamette Valley hydro projects…"***13*** The PPC went on to state "[t]he cost outlook of the projects, already among the most expensive on the federal system, is further threatened by the proposed structural measures in the proposed alternative of the [EIS]." The degradation of power production from both interim operations and the operations in the preferred alternative needs to be included in any economic analysis that the Corps creates when considering decommissioning hydropower at the dams. In addition to the already extremely high cost of this hydroelectricity is the concern that drought will make hydropower even more unpredictable and costly. Between 2003 and 2020, the hydroelectricity sector in Oregon is estimated to have lost more than $1.5 billion in revenue due to drought.***14*** Oregon generated 20% less hydropower in 2023 than in 2021 due to low precipitation during the fall and winter and the summer "heat dome."***15*** WVP hydropower is not climate resilient and will remain unpredictable as the climate continues to change. If the Corps did a thorough analysis of the costs tied to generating hydropower at the WVP dams, it would come to the same conclusion most others have: the WVP power is too expensive to continue using, and with no way of lowering the costs, the price is just too high to pay. ***8*** *Fact Sheet: Power from the Willamette Basin dams, Bonneville Power Administration (2019),*	Thank you for your comment the Freedom of Information Act is a separate legal process. The SEIS, including its detailed appendices, contains significant amounts of information relating to the reasonably foreseeable effects of the alternatives considered in detail including socioeconomic effects. While it is true that hydropower generated at Willamette Valley facilities is expensive in terms of cost per MWh relative to the rest of the FCRPS and the region; however, from a National Economic Development (NED) or total cost perspective, removing hydropower from the Willamette Valley facilities increases the overall cost, regardless of whether the taxpayer (if BPA is relieved of cost sharing obligations) or the regional ratepayer (if BPA is not relieved of cost sharing obligations) pays for the removal of the hydropower facilities as the additive costs for fish passage to comply with the ESA are still a requirement. If hydropower is removed from the Willamette Valley facilities, the total implementation cost would increase by an estimated $500 to $800 million dollars. The energy-resource constrained region would also lose a source of generation. Due to the way the dams were designed, removal of hydropower does not allow for a significantly different operation that would benefit ESA species. Removal of hydropower in the Willamette Valley facilities would relieve BPA of an expensive cost-sharing obligation that results in a high cost per MWh; but that impact is outweighed by the determination it does not benefit the species. It would significantly increase the construction cost and it would remove a source of generation for the region.

Commenter Name	Commenter Affiliation	Comment	USACE Response
		https://www.bpa.gov/-/media/Aep/about/publications/fact-sheets/fs-201908-Power-from-the-Willamette-Basindams.pdf (hereinafter "BPA Fact Sheet"). ***9*** *About the Willamette Valley, U.S. Army Corps of Engineers Portland District, https://www.nwp.usace.army.mil/Locations/Willamette-Valley/.* ***10*** *BPA Fact Sheet.* ***11*** *Id.* ***12*** *Id.* ***13*** *Listening Session.* ***14*** *Alex Baumhardt, Drought has cost the hydropower industry billions in losses in two decades, analysis finds, Oregon Public Broadcasting (Aug. 16, 2024), https://www.opb.org/article/2024/08/16/hydropower-oregonwashington-drought/.* ***15*** *Id.*	
Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	III. Commenters support the annual deep drawdown at Detroit Reservoir. While Commenters have major concerns related to the Corps' the lack of robust analysis related to Alternative 6, we do support the Corps conducting a deeper drawdown at Detroit Dam and Reservoir to aid fish passage. For salmon and steelhead, drawdowns allow juvenile fish to migrate successfully through the dams by temporarily lowering the water level closer to the passage routes far down on the dams. Without these drawdowns, very few juvenile salmon survive the trip through the power turbines on their journey to the ocean. Drawdowns have been effective over the past decade at Fall Creek, where there is a 98-99% survival rate for out-migrating juvenile Chinook salmon and an approximately ten-fold increase in returning adult salmon. Drawing down Detroit Reservoir each fall to improve downstream fish passage for juvenile fish is one of the most effective operational tools available to help Upper Willamette River spring Chinook salmon and winter steelhead survive their migration to the ocean. The Corps' plan to phase the drawdown over three years to reduce the impact on downstream water quality is scientifically sound and well thought out. While Commenters acknowledge that drawdown turbidity and temperature issues require mitigation planning, deep drawdowns are cost effective, maintain flood control, and allow our rivers to return to a more natural flow.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	IV. Decommissioning hydropower at the WVP dams and considering less costly fish passage measures would reduce the length of time interim measures are needed. The Corps' preferred alternative will take many years, if not decades, to implement and during that time, interim measures will be in place. These interim measures do not do enough to protect the fish, and relying on these measures for years is unacceptable. WRDA 2024 states that the Corps "may not complete its review of, and consultation with other Federal agencies on, the operation and maintenance of the projects for flood control, navigation, and other purposes….until the [Corps] prepares and formally analyzes an alternative that ceases hydropower operations at the projects…"***16*** The two structures will require extensive planning, time, and money, and even when built, may not work. Relying on large structural projects is both risky and speculative, considering permitting, contractor availability, seismic design complexity, and cost overruns. If the Corps took Congress's directives seriously, it would understand that decommissioning hydropower at the dams would allow for deep drawdowns that would create more natural flow and would save time and money as well as require far less planning, as drawdowns are already taking place at some of the dams. Interim measures are supposed to be short-term and should have a set timeline. These measures do not, and the Corps needs to choose an alternative that limits the amount of time interim measures are needed and needs to choose an alternative that is cost effective and has a higher certainty of being successful in protecting the fish. Alternative 5 should not be that choice. ***16*** *H.R8812 § 334.*	USACE takes Congress's directive seriously. The hydropower pool is not the limiting factor in allowing deep drawdowns. The hydropower pool represents a small portion of the water stored at several reservoirs, most of the water is stored for conservation purposes, such as water quality and fish and wildlife (Section 1.11.2.2 Operational Considerations for Hydropower; Appendix A Figure 1-2). Congress would have to deauthorize several purposes to allow for greater operational flexibility.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	V. The Willamette Valley Project can still meet its authorized purposes and tribal obligations if hydropower is decommissioned and additional drawdowns are used for fish passage. The Corps pushes back on drawdowns because they say that doing so would lower the reservoirs in a way where it would no longer meet its authorized purpose of recreation. It has gone so far that it has stated "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."***17*** While Commenters think the Corps should consider removing some of the dams, we understand that is a bigger leap than the Corps is willing to take at this time. However, the Corps must recognize that recreation is not synonymous with reservoirs. Flowing rivers support a broader and more resilient spectrum of recreational opportunities, and restoring fisheries would significantly expand angling, wildlife viewing, and river-based tourism, while also reducing public exposure to harmful algal blooms, low-oxygen conditions, and other water quality hazards that disproportionately affect Tribal members, subsistence anglers, and rural communities who rely most directly on these waters for food, livelihood, and cultural practices. Economic studies, particularly those focused on dam removal and river restoration, suggest restored free-flowing rivers often generate significantly higher recreation values than the lost reservoir recreation, with Oregon research highlighting major economic contributions of outdoor recreation overall, indicating strong potential for river-based activities. While specific Oregon studies directly comparing river vs. reservoir recreation values over time are complex, models show gains in river recreation benefits (e.g., fishing, rafting) can surpass lost reservoir benefits, especially as climate change impacts reservoirs, bolstering the case for river-based recreation.***18*** Drawdowns are not always in effect—meaning these communities would continue to have reservoirs during certain seasons, and at other times, would experience a more free-flowing, natural river. Both conditions support recreation, and both continue to contribute to local economies. The Corps should be evaluating alternatives that reimagine what recreation looks like in a changing system, rather than dismissing options outright. Recreation is not lost under these alternatives—it evolves, and in many cases, becomes healthier, more sustainable, and more aligned with the region's ecological and economic future. Economic opportunities that come from decommissioning hydropower include reducing ratepayer burdens, freeing BPA capital for grid resilience, and aligning with regional clean energy planning. ***17*** *Willamette River Basin Feasability Study, U.S. Army Corps of Engineers, https://www.nwp.usace.army.mil/willamette/basin-review/.* ***18*** *John Loomis, Quantifying recreation use values from removing dams and restoring free-flowing rivers: A contingent behavior travel cost demand model for the Lower Snake River, Water Resources Research, Vol. 38, No. 6,1066 (2002).*	USACE agrees that recreation can occur on rivers, reservoirs, and uplands. However, the driver for refilling the reservoir is not recreation it is the other purposes that are met by stored water in the conservation pool including fish and wildlife, water supply, and water quality. The Hydropower pool is generally very small when compared to the amount of water stored for the other conservation purposes. The SEIS considered alternatives with drastic impacts to conservation storage and the water stored in the power pool in alternatives 2B, 3A, 3B, 5 and 6.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	Additionally, the Corps must evaluate how altered flow regimes and improved salmon passage intersect with Tribal treaty-protected fishing rights, which include access to healthy, harvestable fish populations and the ecological conditions required to sustain them. Ignoring alternatives that meaningfully improve fisheries risks perpetuating long-standing violations of federal trust responsibilities. Article 6 of the U.S. Constitution states that "all treaties made, or which shall be made, under the authority of the United States, shall be the supreme law of the land…" Many of the tribes in Oregon have fishing treaty rights as established by 19th-century treaties and court cases like U.S. v. Oregon which guaranteed indigenous tribes the right to fish at their usual and accustomed places on the Columbia River and its tributaries, the Willamette River being one of them, and their fair share of the fish.***19*** In this case, the court held that the state may only regulate when reasonable and necessary for conservation. The WVP dams, as they are currently operated, harm fisheries and put salmon and steelhead at great risk of extinction. Allowing the dams to be operated this way is in direct violation of the federal government's tribal treaty obligations. As the supreme law of the land, these obligations should be prioritized over any authorized purposes that may harm these obligations. Decommissioning hydropower gives the Corps the flexibility needed to improve fish passage at the dams while still allowing other authorized purposes to continue. These decisions carry implications for Tribal Nations, rural communities, and populations who depend on subsistence fishing, who disproportionately bear the ecological and economic burdens of degraded river systems. Incorporating treaty rights is not optional—it is central to determining whether the project fulfills its legal and moral obligations. ***19*** *See United States v. Oregon, 302 F. Supp. 899 (1969).*	The scope of the Proposed Action is to continue the operations and maintenance of the USACE Willamette Valley System for Congressionally authorized purposes while meeting ESA requirements put forth in the Biological Opinion issued by the National Marine Fisheries Service. SEIS Section 3.24 summarizes the Federal Government's legal tribal trust responsibility which includes treaty and reserved rights. This section describes the effects of alternatives on tribal resources, a term that encompasses all resources for which effects are analyzed in the SEIS. A summary of Environmental Consequences for resources is in SEIS Section 3.25 and SEIS Table 31. Appendix O: Tribal Coordination and Perspectives details USACE's consultation and coordination with Federally recognized Tribes throughout the NEPA process.
Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	CONCLUSION The Corps must develop a new SEIS, develop multiple good-faith hydropower cessation alternatives, conduct dam-specific economic and biological analyses, and work with the National Marine Fisheries Service and U.S. Fish & Wildlife Service to redevelop alternatives, providing a clear and legally sufficient path forward. For more than two decades after the listing of Upper Willamette River spring Chinook salmon, steelhead, and bull trout, the Corps has continued to operate the Willamette Valley Project in a manner that places these species at ongoing risk of extinction. The Draft SEIS fails to demonstrate that the Corps has satisfied its affirmative duty under the Endangered Species Act to ensure its actions are not likely to jeopardize the continued existence of listed species or destroy or adversely modify critical habitat. By advancing a preferred alternative that delays effective fish passage for years or decades, relies on interim measures with low certainty of success, and minimizes meaningful consideration of ending hydropower operations, the Corps perpetuates the very conditions that drove these species to listing in the first place.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	The Draft SEIS also fails to meaningfully consider alternatives that would reduce biological harm while maintaining the Project's primary authorized purpose of flood risk management. Decommissioning hydropower—whether systemwide or on a dam-by-dam basis—would allow for deeper and more flexible drawdowns, restore more natural flow regimes, reduce operational costs, and accelerate recovery timelines for imperiled fish. These benefits are particularly critical in the face of climate change, which is already reducing hydropower reliability while increasing thermal stress and migration barriers for cold-water species. Continuing to invest in increasingly expensive and uncertain structural fixes, rather than addressing the root cause of harm, is neither fiscally responsible nor biologically defensible. The Corps' approach also raises serious environmental justice concerns. Tribal Nations with treaty-reserved fishing rights and deep cultural connections to salmon have borne disproportionate harm from the loss of these fish and continue to face barriers to meaningful recovery. Downstream communities, subsistence anglers, and rural economies dependent on healthy rivers and fisheries are similarly affected by prolonged delays and ineffective interim measures. A course of action that knowingly prolongs species decline while prioritizing one of the least efficient and most costly hydropower resources in the federal system fails to equitably balance public benefits and burdens.	The elimination of hydropower alone does not necessarily create an opportunity for more flexible operations. In developing Alternative 6, USACE took a reasoned approach based on the language in WRDA24 and the need to safely operate the dams for the remaining authorized purposes (Appendix A). USACE did look at the operational flexibility ceasing hydropower operations would provide, including using the hydropower pool for other purposes or not storing water in the hydropower pool, in Alternatives 3A and 3B. USACE realized that removal of the hydropower pool provided limited operational flexibility because of the size of the hydropower pool in comparison to amount of water USACE stores for other purposes. For example, not filling the hydropower pool at Detroit Dam and storing water for irrigation and municipal and industrial water supply, means the top of the reservoir would rest below the spillway, a successful route for fish passage in the summer, but above the 25-50 feet the species need to find the next available outlet. Additionally, several measures use the hydropower pool for other purposes than hydropower generation. For example, the proposed drawdowns, including the interim operation at Detroit Reservoir, impact hydropower pools and cease generation operations temporarily as does Measure 304 Augment Instream Flows By Using the Power Pool.
Michelle Emmons, Heather King, Grace Brahler	Willamette River Keeper, Cascadia Wildlands	We strongly urge the Corps to correct these deficiencies by developing a new SEIS and conducting a good-faith analysis of alternatives that fully evaluate ending hydropower operations at the Willamette Valley Project dams. This should include, at a minimum, evaluation of systemwide hydropower cessation as well as dam-specific alternatives tailored to the unique operational, structural, and ecological conditions at each facility, rather than applying a uniform approach across the system, together with climate-adjusted hydrology modeling, clear biological performance metrics, and a cumulative impacts analysis across the full Willamette Valley Project. The Corps must select an alternative that provides the greatest certainty of avoiding jeopardy, accelerates fish recovery, reduces long-term costs, and aligns Project operations with both Congressional direction and the realities of a changing climate. Anything less risks continued legal noncompliance, ongoing ecological harm, and the further erosion of trust with Tribal Nations, communities, and the public the Corps is obligated to serve.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
K Rogers	Independent Citizen	My testimony is short concerning the Detroit Reservoir Drawdown; I support: 1. A slow drawdown 2. Mitigation of any potential flooding issues #1 3. Clean drinking water #2 4. Protect the small fish #3 5. Consider recreation last. In my opinion, People are most important, fish are second and recreation is last. I have lived in Salem for over 25 years and my drinking water comes from the reservoir water. Yes, we have had some issues some years and we survivde it. I trust the Army Corps will do the best they can.	Thank you for your comments. They will be taken under consideration.
Melanie Klym	American Rivers	American Rivers appreciates the opportunity to provide comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Willamette Valley System (WVS). We value the Corps' efforts in evaluating interim operations, addressing hydropower considerations, and responding to the requirements of the Thomas R. Carper Water Resources Development Act of 2024. American Rivers is a national conservation organization working to make every river clean and healthy for people and wildlife. We combine evidence-based solutions with enduring partnerships to safeguard the 4.4 million miles of rivers and streams that are essential to our nation's clean drinking water, extraordinary wildlife, and the strength of our communities. For more than 50 years, our staff, supporters, and partners have been driven by a common belief: Life Depends on Rivers. We respectfully submit the following comments for consideration in the Final Supplemental Environmental Impact Statement (FSEIS).	Thank you for your comments. They will be taken under consideration.
Melanie Klym	American Rivers	1 Interim Operations We acknowledge and support the detailed descriptions of interim and non-hydropower operations provided in Appendix A (Sections 2.6 and 2.9.2). In particular, we support the deep drawdowns at Detroit Dam and the phased operational approach designed to protect downstream water quality (Appendix A, Section 2.9.3). We also appreciate the recognition that sediment conditions at Detroit differ notably from those at Green Peter and Foster. We recommend expanding the analysis to address effects on all native fish species***1***—not only migratory species—and to include discussion of how riverine conditions during deep drawdowns may influence non-native warmwater species. ***1*** *https://seagrant.oregonstate.edu/WRF/Native-Fishes*	The SEIS affected environment and environmental consequences section includes effects on resident native and non-native fish, both in reservoirs and below dams (Chapter 3.8 Fish and Aquatic Habitat and Appendix E - Fish and Aquatic Habitat Analyses).

Commenter Name	Commenter Affiliation	Comment	USACE Response
Melanie Klym	American Rivers	2 Ceasing Federal Hydropower Operations 2.1 Completeness of Alternative Development Alternative 6 is not developed to a level sufficient for full environmental evaluation. The analysis focuses primarily on structural decommissioning rather than on the enhanced operational flexibility that would result from removal of the hydropower pool requirement. Eliminating this constraint directly supports Objective 1, yet Appendix A, Table 1-3 identifies Alternative 6 as meeting only Objectives 2, 4, 5, 6, and 7. The Corps should revise this scoring to accurately reflect the operational benefits provided by alternative 6. Additionally, Appendix C (Section 3.3.1.1) recognizes that hydropower regulation reduces annual peak flows, but the DSEIS does not evaluate the geomorphic or ecological benefits of restoring variability in peak flows under Alternative 6. This analysis is necessary for a complete environmental review as required by the National Environmental Protection Act (NEPA).	Ceasing hydropower operations does not provide USACE with significant operational flexibility, as the WVS must continue to operate for the other authorized purposes, including fish and wildlife, irrigation, water supply, and water quality which require stored water moving fish above passage outlets.
Melanie Klym	American Rivers	2.2 Total Dissolved Gas and Penstock-Related Mortality The DSEIS notes potential challenges related to total dissolved gas (TDG) and fish mortality following removal of turbines but does not evaluate available mitigation measures. Studies conducted by The Bureau of Reclamation***2*** and the Oregon Department of Fish and Wildlife***3*** on cone valve performance at the Arthur R. Bowman Dam and Prineville Reservoir on the Crooked River should inform TDG mitigation measures for WVS facilities. Furthermore, Appendix A, Section 2.6.2 acknowledges that in-line orifices may produce TDG levels comparable to turbines and that fish screens would likely be required to reduce mortality. Appendix A, Section 2.6.2 also recognizes that screens would likely be required to exclude fish from the penstocks which would reduce mortality and that the reduced maintenance of the cone valves and in-line orifices (compared to turbines) could offset the increased maintenance required for screens. These factors should be reflected in the evaluation metrics and scoring for Alternative 6. ***2*** *https://www.usbr.gov/tsc/techreferences/hydraulics_lab/pubs/HL/HL-2009-01.pdf* ***3*** *https://www.dfw.state.or.us/fish/passage/docs/wavers/Bowman_Dam/BOR%202018.pdf*	USACE updated the FSEIS and Appendix A with additional information. Future design efforts would involve features to address TDG levels if this alternative is selected. As there are no designs developed, USACE assumed discharge and TDG levels under Alternative 6 would be similar to Alternative 5. Appendix A has been updated to include text to account for these assumptions and point out uncertainty in the ultimate performance of the current conceptual design. USACE revised the SEIS in effects analysis chapters for consistency with these revised assumptions in Appendix A.
Melanie Klym	American Rivers	2.3 Economic Analysis The economic presentation for Alternative 6 requires clarification. Section 3.12.3.2 identifies a –$569 million net loss associated with continuing to operate sub-market hydropower over the 30-year period. However, Table 3-35 presents results in a manner that implies hydropower production offers a net economic benefit. Furthermore, the description of hydropower as a “non-emitting source of energy” is inconsistent with research documenting methane emissions from hydropower reservoirs***4.*** The economic analysis should be revised to accurately reflect these considerations using the best available science as required by NEPA. ***4*** *https://hydroreform.org/reservoir-emissions/*	Further clarifying language has been added to the section. While the hydropower may operate at a loss under the proposed alternatives due to the cost of implementation, the overall effect of Alternative 6 as proposed is a net national economic development loss. This is due to the increased cost of the proposed alternative and the loss of the value of the power. Additionally, while reservoirs have been shown to produce emissions which could be attributed to single purpose hydropower reservoirs, since the proposed conditions and alternatives do not remove the reservoirs, the removal of hydropower from these projects would not change the methane emitting from the reservoir.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Melanie Klym	American Rivers	2.4 Structural Versus Operational Measures for Downstream Passage We recommend that the Corps replace structural downstream passage measures (Measure 392) with operational measures (Measures 40 and 720) within Alternative 6. Floating surface collection systems have not demonstrated consistent performance across reservoirs with large water-level fluctuations and have not achieved the 95% collection efficiency required by NOAA Fisheries. In contrast, deep drawdowns at Fall Creek have resulted in significantly higher reservoir survival rates of outmigrating salmonids. Section 4.5.7 of the 2024 Biological Opinion identified low passage rates from the head of the reservoir to the dams during spring spill operations at Green Peter dam and higher passage rates for the fall drawdowns at Green Peter and Foster dams. Section 4.2.3.1 determined reservoir survival rates ranging from 18% to 23% in the Lookout Point reservoir. Comparatively, the riverine conditions during deep drawdowns at Fall Creek reservoir have resulted in reservoir survival rates between 74% and 98%. Operational strategies combined with hydropower decommissioning would also reduce costs, enhance dam safety, and improve overall water quality. Section 5.1.1 of Appendix N (Implementation and Adaptive Management Plan) recognizes that the deep drawdown measures could potentially meet the long-term criteria for fish passage, flow, and water quality. Furthermore, the risks and uncertainties for the proposed floating surface structures include “risk of entrance attraction and rejection, passage rates, survival rates, [and] effectiveness given the scale of reservoir fluctuations” (Appendix N, Section 5.1.1). The risk and uncertainties for the deep drawdowns concern water management during dry years. Removing the requirement to maintain a power pool will increase the operational flexibility during dry years and would not conflict with the primary authorized purpose of flood risk management. Please see later comments on measure 392 (Section 8, Measure 392: Structural Downstream Fish Passage) for further concerns about the proposed structural downstream passage measures.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Melanie Klym	American Rivers	3 Dam Safety We commend the Corps for its focus on dam safety, recognizing that each WVS dam carries a high-hazard classification with the possible loss of life downstream if they fail (Appendix A, Section 1.1.4, Alternative 6 Development Process). Operational measures that reduce stored water directly reduce downstream consequences and should be prioritized over structural measures that increase inspection and monitoring requirements (Appendix H, Section 2.1). Deep drawdowns in particular merit discussion for their potential dam-safety benefits. The assumption that seismic events are unlikely during summer conservation pools should be reconsidered, as seismic hazards are not seasonal. We also support the acknowledgment in Appendix H (Section 3) that dam removal may be an appropriate long-term dam safety risk-reduction measure.	Section 2.1 acknowledges that reduction in quantity and duration of stored water results in increased flood storage and a dam safety risk reduction. However, deeper drawdowns would still require increased surveillance and monitoring as discussed in Table 2-1. Drawdowns would also increase dam outlet usage, which would increase fatigue and degradation of aging outlets and operating equipment over time, as described under Section 2 and in Table 2-1. Correct, seismic events are not seasonal. The statement in Section 3 means that the combined probability of a seismic event occurring while the reservoir is at maximum summer conservation level is unlikely in a given year, not that seismic events are less likely to occur in the summer. Since the proposed deep reservoir drawdowns are winter operations, when the reservoirs are normally at their lowest, drawdowns may not have an impact on the seismic risk at every dam. This is because USACE will continue to refill the projects to full conservation levels each summer as able, depending on seasonal precipitation. For projects with very deep reservoir drawdowns and a delayed refill period, the operation could reduce seismic-related risks. However, the drawdown may also introduce other project vulnerabilities. Because of this potential offset, deep drawdowns could not be considered a net benefit to dam safety. Section 3 has been revised to clarify this point.
Melanie Klym	American Rivers	4 Tribal Sovereignty and Decision-Making Authority Tribal nations should be co-equal with the U.S. Government in decision-making (Appendix N, Section 4.3), as their reserved treaty rights include co-management of fisheries. Tribal representatives should not be limited to participation within the WATER group for advisory purposes alone (Appendix N, Section 4.2). In addition, the FSEIS should note that Section 204(b) of the Unfunded Mandates Reform Act exempts Tribal–Federal consultations from Federal Advisory Committee Act (FACA) requirements, provided participation is limited to Tribal officials and federal representatives. This exemption allows for open exchange without FACA's strict requirements only if participation is limited to official tribal representatives and U.S. Government participation. Tribal representatives may participate in the WATER group to inform science-based management decisions while retaining the rights for decision-making co-equal with the U.S. Government.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Melanie Klym	American Rivers	5 River Mechanics and Geomorphology While the Executive Summary in Appendix C provides a clear overview of geomorphic conditions and trends influenced by WVS operations, these concepts are not carried through the full analysis. The assumption that geomorphic stability is inherently beneficial is inconsistent with natural river processes. The focus on "conveyance efficiency" is similarly misplaced for a geomorphic assessment. The 2024 Biological Opinion recognizes "degraded freshwater habitat, including floodplain connectivity and function, channel structure and complexity, incubation gravels, riparian areas, and gravel and large-wood recruitment" as limiting factors for listed species recovery. The analysis should incorporate the following: •evaluation of effective discharges rather than "near-bankfull flow" for sediment dynamics; •recognition that reduced sediment trapping and enhanced sediment transport may be ecologically beneficial; •discussion of potential channel and floodplain responses to revetment modification or removal; and •incorporation of relevant scientific literature, including the Wallick et al. studies referenced in the Executive Summary.	The SEIS is programmatic assessments of effects of alternative ways to operate and maintain the WVP. Site specific analyses would occur for projects when more detailed designs are available. SEIS proposes gravel augmentation to provide beneficial sediment downstream. Revetment modification is also analyzed. The relevant scientific literature has been incorporated in the SEIS.
Melanie Klym	American Rivers	6 Revision of the Evaluation Metrics (Appendix A, Table 1-5) We offer the following recommendations: •Objective 1: Incorporate allowable operational ranges and drawdown timing to reflect water-management flexibility. •Objective 3: Include metrics addressing net revenue generation or minimized losses. •Objectives 4 - 6: o Temperature effects should be an explicit metric. o Upstream and downstream passage rates should be directly measured, not solely used as model inputs. o Downstream habitat impacts related to water levels and sediment supply should be included. •Objective 7: Address ecological changes associated with transitions from reservoir to riverine conditions and how this affects competition and predation. •Cost: Reflect differences in operations and maintenance between cone valves/in-line orifices and turbines, as well as additional dam safety inspection requirements for structural measures. •Economic Effects: Include angling, riverine recreation, and other recreation activities which do not require boat ramps***5***. ***5*** *Economic Value of Visitation to Free-Flowing and Impounded Portions of the Ocklawha River in Florida: Implications for Management of River Flow*	In formulating alternatives, USACE used discretion and professional expertise to develop an appropriate range of metrics to evaluate the alternatives. While the recommended metrics may provide additional information on the differences between the alternatives, based on USACE staff expertise. USACE finds the metrics assessed in the Draft SEIS are sufficient to evaluate and compare the alternatives. No additional metrics will be formulated to assess how alternatives have met the stated objectives. Per NEPA, the lead agency may use its discretion and expertise in formulating alternatives. The lead agency is not required to produce new information or data and can depend solely on available information to analyze effects and identify a preferred alternative.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Melanie Klym	American Rivers	7. Specific Comments on Measures Included in the Alternative Analysis (Appendix A) •Measure 9 (Revetments): Support revetment removal or modification where ecological benefits are substantial, particularly for floodplain reconnection and rearing habitat. We appreciate the summary of past studies and strongly recommend the Corps include a timeline for implementing these projects. To reduce flood risk, the focus should be on reducing flood consequences rather than focusing solely on flood probabilities. Emphasis should be placed on more frequently occurring, lower-magnitude floods to provide ecosystem benefits. Appendix C discusses how extensive revetments combined with hydropower operations have limited floodplain connectivity. The FSEIS should also evaluate how Alternative 6 would influence floodplain dynamics under non-hydropower operations. •Measure 639 (Removal of Drop Structures on the Long Tom River): Strongly support removal for improved public safety, fish passage, and water quality benefits. We encourage the Corps to continue the removal of the Monroe dam and proceed with work upstream. •Measures 40 & 720 (Deep Drawdowns): We appreciate the per-dam discussion and recommend inclusion of these measures in Alternative 6 in place of structural passage systems (measure 392). •Measure 52 (Lamprey Passage): We strongly support inclusion of lamprey passage measures at all WVS dams, including Green Peter, Blue River, and Hills Creek. •Measure 174 (Total Dissolved Gas Abatement): Include designs identified in the Bowman Design studies to reduce total dissolved gas from cone valves. The statement that "little is known regarding the design and construction of riffles and debris jams" is inaccurate; these are common features in channel enhancement projects. See the Bowman Dam studies referenced earlier, the National Large Wood Manual***6*** (USACE, 2016), and the Stream Habitat Restoration Guidelines***7*** (WDFW, 2012) for some design and construction recommendations for these features. ***6*** *https://ewn.erdc.dren.mil/wp-content/uploads/2021/03/National_Large_Wood_Manual-USBR_USACE-January2016-FINAL2.pdf* ***7*** *https://wdfw.wa.gov/publications/01374*	Thank you for your comments. They will be taken under consideration.

Melanie Klym	American Rivers	8. Measure 392: Structural Downstream Fish Passage Recommend screening out this measure based on technical uncertainty and failure risk. Floating surface structures have not achieved required efficiency levels across comparable reservoirs and present significant operational uncertainty. Operational measures, especially when combined with hydropower decommissioning, offer a more reliable and cost-effective approach. This measure should be screened out because "Feasibility, design, cost and specific biological benefit of the structure will be determined during a future consideration design phase" (Appendix A, Section 2.4.4). Technical Screening Criteria (Appendix A, Table 1-2) require screening out measures where available information is not sufficient or demonstrates major risk of failure. The available information on floating surface structures is not sufficient to support implementation of the measure and demonstrates major risk of failure: •The Anadromous Salmonid Passage Facility Design Manual***8*** (NMFS, 2022) requires 95% collection efficiency. •To date, no floating surface collector (FSC) has consistently achieved 95% Fish Collection Efficiency (FCE) across all target species or been successful across the wide ranges of reservoir water levels in the Willamette Valley System: o Cougar Dam (OR): Failed pilot collector (<1% FCE) was removed***9***. o Swift No. 1 (WA): 100 ft fluctuation; initial FCE 20–35%***10***. o North Fork Dam (OR): High success (>90%), but only has a 27 ft fluctuation, unlike Willamette Vally System dams***11***. o Cushman No. 1 (WA): Struggling to meet FCE goals (30-40% initial)***12***. If a collector has a 30% efficiency, the other 70% of fish remain in the reservoir. Uncollected fish become residuals and may suffer predation and increased disease risk in the reservoir. Section 5.2.3.5 of Appendix N acknowledges that the risks and uncertainties of the proposed floating structures include "risks about entrance attraction and rejection, passage rates, survival rates, [and] effectiveness given the scale of reservoir fluctuations." These risks and uncertainties should result in this measure being screened out by the technical screening criteria. We recommend using operational measures combined with the flexibility provided by eliminating the power pool instead of downstream passage structural measures. Removing the structural measures from Alternative 6 would reduce total cost for the alternative (including dam safety inspections and monitoring beyond standard operations & maintenance costs), improve dam safety, and benefit water quality. ***8*** *https://www.fisheries.noaa.gov/resource/document/anadromous-salmonid-passage-facility-design-manual* ***9*** *Beeman, J.W., et al. (2016). Evaluation of the Biological and Hydraulic Performance of the Portable Floating Fish Collector at Cougar Reservoir and Dam. USGS Open-File Report 2016-1003.* ***10*** *USGS. (2018). Development of New Information to Inform Fish Passage Decisions at the Yale and Merwin Hydro Projects.* ***11*** *Smith, C.D., et al. (2018). Fish Behavior and Abundance Monitoring Near a Floating Surface Collector in North Fork Reservoir. U.S. Geological Survey (USGS) Open-File Report 2018-1182.* ***12*** *National Hydropower Association (NHA). (2016). Tacoma Power Cushman Floating Fish Collector Project Overview.*	There is uncertainty in achieving adequate reservoir and downstream passage survival for ESA listed migratory juvenile fish using partial drawdowns as proposed for Detroit and occurring at Green Peter and Lookout Point reservoirs and via structural modification. For structures collection rates are low for Chinook in structures at high head dams with fluctuating reservoirs, and survival rates are high. However, all these approaches require juveniles to navigate and survive in the reservoir prior to passing downstream Chinook emigrate into Fall Creek Reservoir in early spring and must survive until the reservoir is drawn down to stream bed in fall. Reservoir survival during spring to fall has not been directly measured in Fall Creek Reservoir. In Lookout Point Reservoir, survival estimates are low, and USACE expects they are also an important source of mortality above Detroit and Green Peter. Not refilling in spring could reduce the size of the reservoir's juveniles must navigate, as analyzed among the alternatives in the WVS EIS, however summer river flow augmentation and temperature management would be significantly impacted, negatively affecting ESA listed fish than originate either above or below the dams. Fish passing through modified penstocks would continue to have high mortality based on the assumptions applied in the SEIS. The SEIS also includes an adaptive management plan and process as you mentioned.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Trudy Spraker	Independent Citizen	I appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for continued operations and maintenance of the Willamette Valley System (WVS). I write to express strong opposition to the proposed alternatives, including the Preferred Alternative (Alternative 5), and in particular the inclusion of the late fall/early winter deep drawdown of Detroit Reservoir to elevation 1395 feet, which will have serious adverse consequences for drinking water systems, recreation, the Kokanee fishery, and the broader Santiam Canyon economy. The SEIS fails to adequately characterize these and does not demonstrate that the Preferred Alternative will meaningfully benefit ESA-listed fish populations. Our concerns are outlined below.	Thank you for your comments. They will be taken under consideration.
Dean Pollman; Melissa Pollman; David Veenedall	ConKraft Construction, Inc & Storage 4 Less; Independent Citizen	On behalf of myself, my family, and our business ConKraft Construction, Inc and Storage 4 Less, we appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for continued operations and maintenance of the Willamette Valley System (WVS). I write to express strong opposition to the proposed alternatives, including the Preferred Alternative (Alternative 5), and in particular the inclusion of the late fall/early winter deep drawdown of Detroit Reservoir to elevation 1395 feet, which will have serious adverse consequences for drinking water systems, recreation, the Kokanee fishery, and the broader Santiam Canyon economy. The SEIS fails to adequately characterize these and does not demonstrate that the Preferred Alternative will meaningfully benefit ESA-listed fish populations. Our concerns are outlined below.	Thank you for your comments. They will be taken under consideration.
Richard Teerman	Independent Citizen	I write this letter in opposition to a congressional decision to eliminate electrical production at several Willamette Valley dams. I believe that environmental concerns can be addressed successfully while maintaining electric production. I urge you to develop a river system that will continue to produce electricity and ensure environmental quality using all possible advances in technology. I believe that every dam sight should be assessed for the possible generation of electricity using wind power to supplement the energy created by hydro.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Garrett Olson	Independent Citizen	Whom It May Concern, I am writing to state unequivocal opposition to the proposed drawdown of Detroit Lake. This proposal is dangerously short-sighted and would create immediate and long-term harm to public safety, water security, regional infrastructure, and the economic stability of the Santiam Canyon. The risks are clear, predictable, and entirely avoidable. A drawdown will drastically increase turbidity in the North Santiam River. Downstream water treatment facilities—already operating near capacity—will not be able to handle the sudden influx of sediment. This is not speculative; it is a known consequence. The result will be widespread operational failures, boiled-water notices, and disruptions that place tens of thousands of residents at risk. The City of Salem relies on stable, clean water from Detroit Lake. This proposal jeopardizes the drinking water of one of Oregon's largest population centers. Compromising the water source for hundreds of thousands of residents is unacceptable and demonstrates a disregard for basic public health protections. The fill curve being relied upon is outdated and incompatible with current conditions. After the 2020 wildfires, the shade canopy is gone. Snow is melting earlier, runoff is more volatile, and the reservoir refills later—if it refills at all. Proceeding with a drawdown under these new hydrologic realities is irresponsible and increases the likelihood the reservoir will not recover to safe operational levels. Detroit Lake is a critical asset in regional wildfire response. A lowered reservoir severely restricts water availability for both aerial and ground-based firefighting. At a time when wildfire seasons are longer, more intense, and more destructive, reducing this resource is not just unwise—it is dangerous. This drawdown will directly undermine the region's ability to meet water needs for drinking water, agriculture, hydropower, recreation, and emergency response. The proposal guarantees shortages during peak demand months and destabilizes a watershed already stressed by climate change. Detroit, Idanha, and other canyon communities are still recovering from the 2020 Labor Day fires. Their economies depend on predictable lake levels and recreation-based tourism. A drawdown now would set back recovery efforts by years and cause irreversible harm to small businesses that cannot withstand another blow. Fish populations, especially kokanee, are already on the brink. A drawdown will cause another collapse similar to what occurred at Green Peter, with long-term ecological and economic consequences. This is a predictable and preventable outcome. The proposed drawdown of Detroit Lake is a threat to public safety, public health, and the long-term stability of the Santiam Canyon and the Willamette Valley. The risks far outweigh any claimed benefits, and moving forward with this plan would be a significant failure in environmental stewardship, emergency preparedness, and responsible water management. I strongly urge that this proposal be rejected immediately.	Thank you for your comments. They will be taken under consideration.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Lee Loving	North Santiam School District	We, the North Santiam School District 29J School Board and Superintendent, are writing to express our deep concern regarding the proposed Detroit Lake Reservoir drawdown and the severe consequences it poses for our water supply, community stability, and the North Santiam School District's school operations. This drawdown proposal threatens not only the environmental and economic well-being of our community but also the basic daily function of our local schools and essential public services. A reservoir drawdown would significantly increase turbidity levels, overwhelming water treatment facilities across the Santiam Canyon and the Willamette Valley. Salem's system is particularly vulnerable, and a failure upstream would cascade downstream. We have been advised that our city water system in Stayton could be shut down for up to two months due to poor water clarity. This would have an immediate, critical impact on our school district's operations. Without running water, schools cannot operate safely. To stay open, we would be forced to bring in a large number of porta-potties for every school site, assuming sufficient units could even be sourced. It is likely that statewide shortages would occur as multiple districts, including Salem-Keizer, compete for the same emergency supplies. Additionally, our schools would need to secure massive quantities of potable water every day for drinking, food service, and basic sanitation. This would be extremely costly and would present major logistical challenges. Students with health conditions requiring access to clean water would be placed at significant risk. Together, these porta-potties, hand-washing stations, potable water, and associated service and maintenance needs are anticipated to have limited vendor availability and are estimated to exceed $200,000 over a two-month period. If water service is interrupted, the district has been warned that we may be unable to operate schools for up to two months. Even if we attempted to remain open: ● Students in grades 9–12 may be required to shift to online learning, which would create significant instructional, scheduling, and access challenges. Students in grades K–8 do not have district-issued Chromebooks. Emergency distribution and securing portable Wi-Fi hotspots would be chaotic and time-consuming and would not address students' lack of access to running water at home. ● Students across Oregon, including those in the NSSD, experienced significant disruptions to their learning during the pandemic, particularly in reading and math. The shift to asynchronous, at-home instruction led to significant and measurable learning loss. Our students should never have to experience that level of interruption again. ● School meal service would be disrupted entirely; we cannot prepare food safely without potable water. ● The operational toll on staff , facilities, budgets, and student learning would be catastrophic. This level of disruption demands advance planning that is currently impossible without clear timelines and guarantees about water availability. The educational, financial, and public health consequences of this proposal are overwhelming.	USACE designed the proposed drawdown of Detroit Reservoir to minimize turbidity levels in the North Santiam downstream of Detroit and Big Cliff dams. Previous drawdowns at Cougar, Green Peter, Lookout Point, and Fall Creek dams released varying amounts of sediment eroded from cutting a new channel and newly exposed reservoir beds. USACE assessed the elevation of the drawdown and the sediment data patterns from past drawdowns and determined a step-down approach would slow the amount of mobilized sediment and expose less surface area each year, reducing the amount of sediment that could erode and pass downstream of the Detroit and Big Cliff dams. USACE developed an Emergency Response and Communications Plan for other drawdowns and would coordinate with North Santiam communities to update the plan to include Detroit Reservoir. This effort is separate from the SEIS. USACE would use real-time hydrology and turbidity data each year to modify the operation to improve conditions for fish and reduce adverse impacts that may occur.

Commenter Name	Commenter Affiliation	Comment	USACE Response
Lee Loving	North Santiam School District	A full reservoir is also critical for firefighting capability. With the loss of forest canopy following recent Canyon wildfires, snowpack is melting earlier, and runoff patterns have changed dramatically. The outdated reservoir fill curve does not reflect current hydrologic realities. Reducing reservoir storage will further destabilize a system already stressed by climate impacts. A drawdown leaves our NSSD communities with fewer resources during peak wildfire season—putting homes, infrastructure, and lives at heightened risk. Every reservoir in the Willamette system faces similar vulnerabilities. Reducing water storage increases costs, strains infrastructure, and puts entire communities at risk. Oregonians cannot absorb higher utility bills, weakened water reliability, school closures, or further loss of critical infrastructure. For the sake of public health, community safety, and educational stability, we respectfully request that decision-makers reject this Detroit Lake Reservoir Drawdown proposal and pursue solutions that protect both our water system and the communities that depend on it. Thank you for your attention to this urgent matter.	The drawdown would occur during the late fall and early winter, when the reservoir is at the minimum conservation pool elevation and outside of fire season. The drawdown operation would end about one month before the normal refill season. Even during the drawdown, a large pool will remain to assist with Firefighting efforts.
James Bruce	Independent Citizen, Kokanee Power of OR	Please don't allow them to kill all the Kokanee in Detroit Lake. Thank you for your time.	Thank you for your comments. They will be taken under consideration.
Gary Kintz	Independent Citizen	As a home owner of Detroit OR, I appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for continued operations and maintenance of the Willamette Valley System (WVS). I write to express strong opposition to the proposed alternatives, including the Preferred Alternative (Alternative 5), and in particular the inclusion of the late fall/early winter deep drawdown of Detroit Reservoir to elevation 1395 feet, which will have serious adverse consequences for drinking water systems, recreation, the Kokanee fishery, and the broader Santiam Canyon economy. The SEIS fails to adequately characterize these effects and does not demonstrate that the Preferred Alternative will meaningfully benefit ESA-listed fish populations. My concerns are outlined below.	Thank you for your comments. They will be taken under consideration.
Linda & Richard Ackerman	Independent Citizen	Being a lifelong resident of the Santiam Canyon, I urge you NOT to move forward with this flawed drawdown, The risk of damage to the downstream residents and cities is too large to offset the few smolts that will pass through the gates of the dam. For years the North Santiam river was world recognized as a stellar salmon and steelhead river. Which brought sportsmen and their families from across the globe to stay and visit our communities. Then along came the environmentalist that said only wild fish need to be in the river. They made up all sorts of reasons why hatchery fish are bad for this river. While in fact what they were calling wild fish were actually hatchery fish that have endured the decades of hatchery rearing and release. We are beyond shutting the door after the horse if out and should be concentrating on hatchery improvement and education of the public. The Corp said that they would replace and supplement the fish population that would be interrupted by the dams. The Corp let the public down by not keeping up with the fish stock and education of the public that Hatchery and Wild can coexist.	USACE continues to fund production of hatchery Chinook and trout to mitigate effects of the WVS dams and reservoirs.

PUBLIC COMMENT CORRESPONDENCE

From: [redacted]
To: Rep Diehl; CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Dam Drawdown - E;lectricity
Date: Wednesday, December 31, 2025 4:46:13 PM

Dear Jamie,

Happy New Year of the Horse to you and Rep. Diehl! Thank you for your answer on electricity. Here are more questions re this subject . I have addressed USACE too so that they may provide the right answers to both of us.

1. You said USACE said there will be electricity production. How is this possible when they are drawing water farther down past the 30 fee, where the electric outlets are, to about 55 feet?
2. Is there a special method they use that we are not aware of? If so please explain.
3. Do we get minimal electric power?
4. Will there be shortages?
5. As you are aware, we use more electricity in the winter months. Will there be a huge supply of electricity for all of Salem, Stayton, Detroit City and other surrounding cities that rely on Detroit dam for electricity?

Thank you for your response. I hope you and Rep. Diehl will have a very happy new year of he fire horse.

Kaethe

From: Rep Diehl <Rep.EdDiehl@oregonlegislature.gov>
Sent: Tuesday, December 23, 2025 12:12 PM
To: Kaethe Mentrum <celaandgany@hotmail.com>
Subject: RE: Detroit Dam Drawdown Update

Hi Kaethe,

Rep. Diehl has spoken to the BPA about the electricity. They said it will still be producing electricity and that the output will be reduced but by a very small amount. BPA also told him that the Willamette Hydropower electric system produces just 1% of all the BPA hydropower.

Best Regards,

Jamie Diehl
Chief of Staff
Representative Ed Diehl

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Dam proposed drawdown
Date: Saturday, December 27, 2025 12:20:50 PM

Hello : After I have spent many hours researching the seemingly misguided drawdown proposal that had the intent of saving endangered salmon
The items below are suggestions and concerns :

1,. The regulating outlets were built too low for small fish to use and if the army corp. lowers the water level too low much sediment will not only kill the fish but also destroy the drinking water as in the Green Peter dam fiasco. Currently the sediment levels are vey high due to the heavy rainfall .
2. If the CORP. Lowers the water in 10-20 foot stages and runs into sediment it may not be low enough for smalls to reach the much lower outlets so that would not save the fish as was intended.
3. If the draw down goes too low the electric charging station will reduce power.
4. Instead of taking a chance on killing fish and destroying the region water quality why not gather the fish into an area where they can be netted or siphoned into tubes
and carried down stream to spawn. Even though this system is not the most efficient it would safer in the end overall.
Bayard Mentrum, Chairman of Northgate Neighborhood association in Salem

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Deep Drawdowns
Date: Monday, December 22, 2025 4:20:34 PM

To Whom this may concern:
I have been a resident of Stayton, Oregon for 13 years. Life is enjoyable here.
Stayton enjoys clean, clear water, one of the finest in our state. This water **meets or surpasses all state and federal water quality requirements**. It was even recognized for its taste, winning "Best Tasting Surface Water in Oregon" for two consecutive years in the past.
The city uses a reliable slow sand filtration process, which employs naturally occurring biological activity to remove contaminants. This is a key factor in its high quality.

This means that the systems used to filter this water are much simpler and less sophisticated than the elaborate filtering systems used in other cities.
Any elevation in the turbidity would destroy Stayton's filtering systems and cause extensive damage, making the system hard and very expensive, long and difficult to replace.
Stayton's water may take a very long time to recover from this, and possibly never completely recover to its present state.

The drawdowns are planned over several years, making any repairs futile, as new assaults of increased turbidity caused by even progressively more severe drawdowns would come each successive year.

This is a prospect all inhabitants of our region are extremely apprehensive about. We feel the price to pay for the salvation of a protected fish species -- which is doubted by some scientists and criticized by some is disproportionate to the result that is only hopefully for.
Please cancel all plans for such deep drawdowns in Detroit Lake, and consider dredging upstream instead, assisted by transportation of the fish by truck.
Thank you for your consideration.

Michael Mullejans
Stayton, Oregon

Yahoo Mail: Search, Organize, Conquer

From: [redacted]
[redacted] CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit drain-down
Date: Monday, December 22, 2025 8:29:22 PM

My name is Roger Lemons and have been a resident up here for 30+ years. This town is just now coming out the fire damage, and water quality issues, and the power being off for days on end and mostly in the winter time. In fact we just made it through 6 days without water and a week prior, we had no power.

I know we are not fish but we have rights just the same. Please figure out another solution or the SOL group will be more powerful than the COE group.
Get Outlook foriOS

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Draw down
Date: Tuesday, January 13, 2026 11:41:16 AM

Army Corps of engineers, To Whom it may concern,

I am submitting six comments in regard to the proposed drawdown of Detroit Lake, which I believe have not been discussed .

1.There has not been open discussion or data released of original native populations of salmon that were able to travel above Willamette falls prior to 1885. The populations were very limited, how do they compare to today? The first augmentation occurred in 1885 and again in 1893. After these man made improvements in the Willamette falls , fish migration and populations in the main stem Willamette basin increased drastically. Without man made improvements to the Willamette falls would fish even migrate past the falls?
Will the future plans to "re -wild "the Willamette Falls include removing the man- made augmentation of the falls to enhancing fish migration. Why would you spend millions more dollars on the Willamettte Basin Salmon if the "re-wilding" of the falls is going to remove the salmon's ability to travel above the Falls?

2. There has not been any discussion of utilization of off Channel habitat and spawning channels in the Willamette river system to enhance opportunities for fish. These have been very successful in British Columbia fisheries in many locations. The off channel site I have personally visited is 900 river miles from the ocean and has a
successful salmon spawning population for 30 years. These off channel spawning beds should be on every salmon river in the Willamette system. Very low cost to construct, and maintain. No mention that this program has been looked at.

3. There has been no mention of the effect of the Salmon migration by drug pollution in river water by anti anxiety medication in urban sewage water disposal. These
compounds have been shown to have a large affect on migrating young salmon. there are many urban sewage systems utilizing the Willamette system that have not been identified and tested for this potential issue.

4. In summer of 2025 the roadside herbicide spraying on Highway 22 from Gates to Marion Forks, at times the application less than 5 yards from the Santiam river,a designated salmon stream. Most noted above the city of Idahna. Few ,if any herbicides are labeled for this type of application close to running water. Made on both sides of the highway.

5.Chemical residue, leachate from tire wear. Tire wear chemical 6PPD- quinone significantly affects salmon populations. Most, if not all rivers in the Willamette Basin have major highways next to them. Resulting in possible significant leaching of 6PPD -quinone, not mentioned by Corps of Engineers. large urban rain water discharge from shopping center parking lots eventually flows to streams as well.

6. The Corps of Engineers has already admitted to the release of invasive apex salmon predator fish into the Willamette River. Walleye. Reminiscent of the Spotted Owl
activities of the 1990's. when Federal forest officials shut down all forest activities ,harvest etc, over protection of the spotted owls. As it turned out the spotted owl decline has been due

to an invasive Barred owl species feasting on the spotted owl all along. Now it is planned to kill
500,000 Barred owls as a "possible" control.
In the meantime over 1,000,000 acres of prime protected forest have burned in Oregon, the owls population have declined. Essentially nothing was accomplished in 35 years by these policies. The generation has lost the revenue from the forest. The communities that relied on the forest have diminished.
There has been no data released that the massive Draw down technique of reservoirs has any real success. There are many options available to the management agencies for fish that have not been tried. There are many contributing factors effecting the fish populations . The draw down will effect hundreds of thousands of people in the Willamette Valley and cost municipalities millions of dollars. Again, with no supportive data.
It appears the process is incomplete. And the drawdown is not the answer . Effecting to many people and costing to much .

Submitted by
Joel Myers
Detroit Oregon

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: Rep.EdDiehl@public.govdelivery.com
Subject: [Non-DoD Source] Detroit Lake Deep Drawdown Impact
Date: Wednesday, December 24, 2025 3:11:31 PM

Hello, I am a 75 year old female who has grown up and lived in the North Santiam Canyon area, specifically in Stayton, Oregon, my entire life. And, I am deeply concerned about the Corp's planned deep drawdown of Detroit Lake and the resulting impact to my drinking water.

I understand the planned slow step down is being driven by the Endangered Species Act, a federal court injunction, and a 2024 Biological Opinion issued by NOAA Fisheries, which you did not challenge. However, my concern is with my drinking water, which is the best tasting water in the State of Oregon having been voted this distinction from the State's Wastewater Treatment Professionals in a blind taste test for many years running.

Stayton uses a slow sand filtration system of treatment and the planned drawdown of the North Santiam River will cause turbidity that our system is not designed to handle. Slow sand filtration systems used to treat water for human consumption have been in use for centuries and work especially well with clear mountain streams, such as the North Santiam River. However, they can not handle high sediment loads, like what you will create with the deep draw down of the river. Fine powder like sediment, which is what you will create in a deep draw down of the North Santiam River, will **permanently damage** slow sand filtration systems, like Stayton's! You will leave our city of over 8,000 people without usable water for weeks if not months or years.

If the Corp **cannot guarantee** Stayton will not lose our drinking water, then I demand that you must pause the planned draw down and work with Congress to either re-evaluate the drawdown requirement, modernize the Environmental Species Act, or fully fund a redundant water treatment system for my hometown. Anything less will be disastrous to the many people who depend on the clean clear water of the North Santiam River.

Sincerely,
Wendy Stone

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Downdraft Concerns
Date: Monday, December 29, 2025 12:36:41 PM

Hi USACE
I am writing as a resident home owner in the city of Salem. I have heard that the proposed drawdowns are to support the Chinook Salmon which are possible endangered as a species, however I understand that this is no longer true.

I also have good reason to suppose that the increased turbidity of waters in the lake will be too risky and expensive due to requiring alternative water filtration systems and may affect our water quality and supply, not to mention sources of hydropower. This will affect my quality of life and my property value.

Furthermore, I don't believe the tiny young Chinook can swim deep enough to exit and accomplish your purpose.

Please re-assess these important aspects of your plan.

Thank you for listening
Laura Jamieson

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit lake draw down. public input.
Date: Tuesday, December 23, 2025 8:53:55 AM

Hello, to whom it may concern. The idea of a deep draw down of Detroit lake is a TERRIBLE IDEA! You will NOT get the kind of results you think you will. What you will do is ruin one very strong fish population of Kokanee salmon in the thousands by attempting to save a few hundred Chinook salmon with a long shot wild guess!

The Lake does provide economic activity all year. Even in winter now at low levels. Detroit and the Santiam canyon area has struggles enough from changes in logging, lack of hatchery fish program from ODFW and recent wild fires.

The lack of planning for fish passages many years ago when the Dam was built was a poor decision. Making a SECOND poor decision will not correct the first one!

Find a way to “stock” the Chinook salmon into the upper river. Develop a method to trap the smolts and truck them below BOTH reservoirs. (Detroit and Big Cliff). This would not be simple but would be less disruptive to all other parties involved for the entire surrounding community.

You need to find other ways to address the fish passage. Do NOT attempt a deep draw down of Detroit Lake.

Joe Dula.

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Draw down
Date: Monday, December 22, 2025 3:33:49 PM

Please stop with the drawdown of that lake. Those People and all of us have been endangered species acted to death. Between this and the IMTS / Forest service leter rip fire policies and the repercusions of road closures due to fire and landslides From the fires we have had about enough. We need solutions and this is an unacceptable solution. These are our public lands build fish ladders and leave the lake alone we need the forest service to scrap the endangered species act and open up our roads and put fires out and build a stinkin fish ladder.
Thanks for listening
Dianna Lamb

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Drawdown Attn: CENWP-PME-E/Willamette EIS
Date: Friday, January 9, 2026 11:07:06 AM

Date: Jan 9th, 2026
To: U.S. Army Corps of Engineers, Portland District
Attn: Liz Oliver, Project Manager
Willamette Valley System Draft Supplemental EIS
333 SW 1st Avenue
Portland, OR 97204

Re: Comments on the *Willamette Valley System Operations and Maintenance – Draft Supplemental Environmental Impact Statement (November 2025)*

Dear Ms. Oliver:

On behalf of the **Detroit Lake Foundation**, we appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for continued operations and maintenance of the Willamette Valley System (WVS). Our organization represents residents, recreational users, and community stakeholders who rely on Detroit Lake, the North Santiam River, and the surrounding watershed for drinking water, recreation, ecological health, and economic stability.

We write to express **strong opposition to the Preferred Alternative (Alternative 5)**, and in particular the inclusion of the **late fall/early winter deep drawdown of Detroit Reservoir to elevation 1395 feet**, which will have **serious adverse consequences for drinking water systems, recreation, the Kokanee fishery, and the broader Santiam Canyon economy**. The SEIS **fails to adequately characterize these effects** and does not demonstrate that the Preferred Alternative will meaningfully benefit ESA-listed fish populations.

Our concerns are outlined below.

1. Detroit Drawdown Impacts Are Significantly Understated

The SEIS acknowledges that the Detroit deep drawdown will adversely affect water supply, drinking water operations, and recreation (Executive Summary §7.2.2). However, the analysis **minimizes the true severity** of these impacts:

1.1. Water supply and turbidity impacts

Detroit Reservoir provides and supports municipal and community water supply needs in the region. A deep drawdown invariably reduces available storage volume and may lower reservoir elevations at a time when water demand for downstream communities still remains. Downstream communities—including Salem, Stayton, Turner, Jefferson, and rural water districts—serve **over 200,000 Oregonians** who

rely on the North Santiam River for drinking water. The SEIS does not provide credible analysis that these systems can withstand prolonged or repeated turbidity spikes. The SEIS states that the drawdown will cause "moderate" increases in sediment and turbidity. This conclusion is **not supported by recent empirical evidence**:

- The 2023–2024 Green Peter drawdown—conducted for the same purpose and referenced repeatedly in the SEIS—caused catastrophic turbidity levels and an estimated **$37–40 million in damage to municipal drinking water systems downstream**, particularly for the City of Lebanon and others. Despite this new information, it is absent from the SEIS turbidity analysis and NMFS's 2024 Biological Opinion did not incorporate this data, triggering ESA reinitiation requirements (50 CFR ¬ß402.16(a)(2)).
- The SEIS claims Detroit impacts will be lower due to reservoir morphology, but provides **no quantitative sediment modeling**, **no turbidity projections**, **no treatment threshold analysis**, and **no emergency planning framework**.

This is insufficient under NEPA's requirement for "high-quality information and accurate scientific analysis" (40 CFR 1500.1(b)). The SEIS should provide turbidity predictions, sediment load modeling, drawdown-specific geotechnical analyses, and evaluations against Oregon Drinking Water Services turbidity treatment thresholds. We urge USACE to ensure the SEIS clearly assesses:

- The specific reduction in available storage volume resulting from each proposed drawdown scenario (feet of drawdown / acre-feet of loss) and the corresponding reduction in yield available for municipal water supply.
- The timing of drawdown relative to municipal refill needs, hydrologic variability (drought years or low inflow years), and how that could compromise municipal supply reliability.
- Whether municipal supply agreements or commitments are guaranteed or prioritized in the revised operational regime.
- The potential need for emergency water-supply interventions in downstream communities if reservoir elevation remains low through the season.

Without this assessment, proceeding with a deeper drawdown risks placing undue burden on local municipalities and water-users, contrary to the statutory authorized purpose of water supply.

Moreover, the Corps did not include an evaluation of suction dredging to mitigate the impacts of sediment on municipal water systems. As reservoir levels fall, increased turbidity can overwhelm drinking water treatment systems downstream, particularly those that were not designed for continuous high-sediment loads. The SEIS should analyze the feasibility and effectiveness of this concept to ensure that public health and drinking water reliability would be safeguarded.

1.2. Failure to assess public health risks

The SEIS acknowledges potential threats to drinking water reliability (Chapter 3.19) but does not:

- Analyze public health risks should treatment systems become overwhelmed
- Evaluate cyanotoxin mobilization from sediment
- Require contingency plans for emergency water supply

Given that Salem's 2018 algal toxin crisis required statewide emergency action, **failure to robustly analyze drinking water vulnerabilities is a significant deficiency**.

Without this analysis, NEPA's requirement to evaluate "public health and safety" impacts (40 CFR 1502.16) is not met.

2. Severe Recreational and Economic Impacts Are Not Fully Disclosed

As stated by the SEIS in Chapter 3.14, Detroit Lake is one of the most heavily visited waterbodies in the Willamette Basin. Detroit Reservoir is used heavily for recreation—boating, fishing, camping and tourism—which contributes substantially to the regional economy and quality of life. This is especially important for the rural communities of the North Santiam Canyon, which have struggled to identify areas of economic growth following the decline of the timber industry and are still working to recover from the devastation of 2020's catastrophic wildfires.

A deep fall drawdown would expose larger shoreline areas, reduce boat ramp access, shorten the effective recreation season, diminish reservoir aesthetics, and could destroy the Kokanee fishery. The SEIS acknowledges low summer levels "may" occur in dry years—but this is an understatement:

- The drawdown releases **over 150,000 acre-feet of water late in the year**, reducing the probability of refill even in average winters.
- The SEIS provides **no hydrologic modeling** of refill likelihood following the deep drawdown sequence.
- The likelihood of **boat ramp inaccessibility**, **marina closures**, **cancellation of recreation seasons**, and **loss of regional tourism revenue** is understated.

Again, Detroit and Idanha—already devastated by the 2020 wildfires—depend on recreation for survival. The socioeconomic section of the SEIS relies on **regional economic models that mask severe local impacts**, failing to capture:

- Business closures
- Loss of tourism-dependent jobs
- Impacts on public services and tax revenue

Chapter 3.14 acknowledges potential recreation loss, but:

- The SEIS does **not model refill probability** following a 1395' drawdown,

despite disclosing that dry years may prevent refill (Executive Summary §7.2.2).

- Socioeconomic modeling uses **MSA-level** data (Table 3-29), obscuring acute impacts to Detroit, Idanha, and the Santiam Canyon.
- NEPA requires the evaluation of **localized effects** where impacts are severe (40 CFR 1508.27(b)(3), intensity factor).

Failure to disaggregate economic impact results in an incomplete effects analysis.

The drawdown threatens to prolong and deepen already fragile post-fire community recovery. We recommend that the SEIS include:

- A comparative analysis of recreation access under the current operational regime vs. the deeper drawdown alternative: e.g., number of days shorter the season, number of boat ramps unavailable, shoreline reduction in usable recreation area.
- An estimate of lost economic revenue (in dollars) to recreation-dependent businesses (marinas, lodging, campgrounds, bait/tackle shops) for each drawdown scenario versus the no-drawdown baseline.
- Mitigation measures or compensatory strategies (e.g., improved ramp infrastructure, seasonal coordination, visitor information) to reduce recreation loss.
- A transparent stakeholder engagement plan involving local businesses, tourism agencies, and recreation users in shaping mitigation.

3. Devastation of the Kokanee Fishery Is Not Adequately Analyzed

The local kokanee (land-locked sockeye) fishery is an important ecological, recreational and economic resource. Lower reservoir levels in the fall and winter will degrade kokanee spawning habitat, reduce refuge areas, increase temperature variability, concentrate predators, and alter food-web dynamics unfavorably. While the draft SEIS emphasizes ESA-listed salmon and steelhead, it gives little attention to kokanee and other fish species that provide an invaluable economic attraction for the North Santiam Canyon.

The SEIS acknowledges that the drawdown will increase entrainment, injury, and mortality of resident fish species—including stocked Kokanee and trout—stating that “significant reductions in abundance” are possible (Executive Summary §7.2.2), however:

- The SEIS minimizes the recreational and economic importance of the Kokanee fishery.
- No population modeling is provided.
- No mitigation measures are proposed.
- No stocking adjustments or survival targets are included.

This does not meet NEPA's requirement for evaluating ecological consequences at a sufficient level of detail (40 CFR 1502.2). The Green Peter drawdown wiped out its Kokanee fishery entirely. The SEIS offers no evidence that Detroit would fare differently.

We urge USACE to:

- Include in the SEIS a focused assessment of the kokanee population dynamics under deeper drawdown conditions (e.g., spawning redd exposure, altered shoreline habitat, cold-water refugia).
- Compare impacts not only to anadromous fish but to resident fisheries whose value is measured locally and regionally.
- Identify monitoring protocols and trigger-points (e.g., kokanee population decline beyond threshold) that would prompt adaptive management.
- Propose mitigation measures (e.g., artificial spawning habitat, refuge water releases, timing of refills) to protect the kokanee fishery alongside the anadromous species goals.

4. The SEIS Does Not Demonstrate That the Preferred Alternative Will Benefit ESA-Listed Fish

The purpose of the Detroit drawdown is to improve volitional downstream passage for juvenile Chinook and steelhead. However, the SEIS:

- Provides **no Detroit-specific survival modeling**
- Does not analyze effects on egg-to-smolt survival basin-wide
- Acknowledges that downstream passage benefits are **limited**, **seasonal**, and involve **tradeoffs harmful to other life stages**

Additionally, NMFS's own Biological Opinion (2024) was completed **without incorporating the massive new information** from the Green Peter drawdown disaster, which has thus far show no measurable benefit to endangered fish populations.

- New information invalidates key assumptions of the RPA
- NMFS is obligated under ESA §7(d) to **reinitiate consultation** when new information reveals effects not previously considered
- The SEIS cannot rely on a flawed Biological Opinion to justify the Preferred Alternative

The SEIS fails to show that the Detroit drawdown meaningfully contributes to salmon recovery, especially given the absence of modeled survival improvements and the lack of long-term passage infrastructure.

We recommend that the Corps significantly expand sediment sampling downstream of existing drawdowns, which havemobilized large volumes of fine sediment. This information is critical because high suspended-sediment loads can smother redds,

impair gill function in juvenile salmonids, and reduce aquatic insect production. Without a more comprehensive understanding of how mobilized sediment affects downstream fish habitat and population health, decision-makers and the public cannot fully evaluate the ecological consequences of the proposed operations.

The USACE should not implement a deep drawdown at Detroit Reservoir until it can provide empirical data demonstrating that similar drawdowns—such as the recent operations at Green Peter and other Willamette Basin projects—have produced measurable, biologically meaningful benefits for endangered fish populations. At present, no evidence shows that these actions have definitively improved downstream survival, increased adult returns, or contributed to population recovery goals, while the documented harms to water quality, resident fish, and community water systems are substantial. Before proceeding with another high-risk drawdown, the Corps must present clear, site-specific data proving that these measures are effective and necessary for ESA-listed species recovery.

5. The SEIS Fails to Analyze Reasonable Alternatives

The National Environmental Policy Act requires evaluation of alternatives that avoid or minimize environmental harm. The SEIS should have evaluated:

- **Less severe drawdowns**
- **Modified timing** that avoids conflict with drinking water demand cycles
- **Fish passage improvements that do not rely on deep drawdowns**
- **Revised Guide Curve (WCM) optimization**, which our organization strongly supports
- **Accelerated structural fish passage solutions** rather than repeated interim measures

Because these alternatives were not fully considered, the SEIS does not meet NEPA's requirements for a "rigorous and objective evaluation" of alternatives. Given the potential adverse consequences described above, the SEIS should thoroughly evaluate alternative operational regimes that balance fish-passage objectives with water-supply, recreation and resident-fish protections. Specifically:

- Consider less aggressive drawdown alternatives (e.g., reduced depth of drawdown, shorter duration, timing shifts) that yield fish-passage benefit while limiting downstream impacts.
- Incorporate a robust adaptive management framework with defined monitoring, performance metrics, stakeholder review periods and the ability to revert or modify drawdown operations if unacceptable impacts occur.
- Provide for contingency plans for drought years or when municipal supply levels or recreation season viability is already compromised.
- Clarify who bears risk and cost for recreation loss or water-supply shortfall (USACE, state/local agencies, municipalities, water-users).

6. Requests

Within the SEIS, the U.S. Army Corps of Engineers seems to acknowledge the shortcomings of the proposed drawdown by stating, "…the deep drawdown at Detroit Reservoir is expected to adversely affect water supply, water quality, drinking water (facility operation), and recreation. The effects of the drawdown on fish are mixed…"

Given the deficiencies of the SEIS and the risks of the actions it proposes, we urge the U.S. Army Corps of Engineers tos**uspend implementation of the Detroit deep drawdown, until the agency can:**

1. **Request that the Department of Commerce and NMFS rescind and reinitiate the 2024 Biological Opinion**, incorporating new information from Green Peter impacts.
2. **Prepare a new SEIS that**
    1. **Conducts full quantitative modeling** of sediment, turbidity, refill probability, fish survival, and socioeconomic impacts.
    2. **Evaluates less harmful operational alternatives**, including adjustments to the Guide Curve.
    3. **Integrates community-level economic analysis**, not just regional modeling.
3. **Ensure the availability of financial mitigation assistance** to compensate local economies and businesses that could be undermined by the drawdown before implementing such a drastic measure.
4. **Complete the study on turbidity** mandated by Congress in 2024 WRDA legislation, before moving forward with a drawdown.
5. **Engage directly with downstream drinking water providers** to evaluate infrastructure risks and protective measures and ensure water systems are prepared for increased turbidity levels.

Conclusion

In closing, while the **Detroit Lake Foundation** supports the fundamental goal of improving passage for ESA-listed anadromous fish species in the Willamette Basin, we believe the proposed deeper fall drawdown at Detroit Reservoir carries significant risks for municipal water supply reliability, recreation access, and kokanee fishery that together threaten to undermine public health and economic wellbeing of communities throughout the region. The SEIS should not only analyze these impacts thoroughly but also provide concrete mitigation, alternative operational options, ongoing monitoring and stakeholder protections

before proceeding.

As outlined above, the SEIS does not sufficiently analyze or disclose the serious risks associated with the Detroit deep drawdown and does not demonstrate that the Preferred Alternative would provide measurable benefits to ESA-listed fish populations. The consequences for municipal water systems, public health, recreation, fishery resources, and the already fragile Santiam Canyon communities are severe and unacceptable.

We respectfully request that USACE withdraw or modify the Preferred Alternative and undertake a more comprehensive, scientifically grounded evaluation of impacts and alternatives.We look forward to continuing engagement in this process and working collaboratively to ensure balanced outcomes.

Thank you for your consideration of these comments.

Sincerely,

Tracie Evenson
Lake Level Chair
Detroit Lake Foundation
[redacted]

Sent from my iPhone

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake drawdown on Santiam River
Date: Monday, December 22, 2025 9:34:30 PM

The proposed experimental drawdown of Detroit Lake to benefit salmon and steelhead populations. The experiment will have many serious and expensive negative consequences for the residents in the Willamette Valley but also for the fish. The plain fact is, if we don't mitigate climate change there won't be any fish. The power from Detroit Dam is an important component in the response to climate change, particularly given the current back pedaling in Washington DC.

Given the strong returns of hatchery fish and reasonably stable returns of wild fish in the North Santiam, the improvements being made in hatchery breeding programs, the available spawning grounds below Detroit Dam and the need for base load power it makes no sense to sacrifice Detroit lake on an experiment. If we want to further help fish, we already know what works; Improving existing habitat with shading, erosion and nutrient control, timing the release of reservoir water, better selective breeding at hatcheries and control of excessive predators at Dams.

Dan Keeley
[redacted]

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Drawdown Public Comment
Date: Thursday, January 8, 2026 3:01:56 PM

U.S. Army Corps of Engineers,

Hello there, my name is Logan Ellis. Recent Fisheries and Wildlife degree graduate from OSU and Owner of Chicken Little's Guide Service. I am one of the few forest service permitted fishing guides on Detroit Lake. I am very concerned with the proposed drawdown for Detroit Lake for several reasons. After seeing the tragic events that happened at Green Peter, I do not want the same thing to happen to Detroit.

To start, I am most concerned about the kokanee population in Detroit Lake if this drawdown were to happen. After seeing the entire Green Peter kokanee population get wiped out completely, this absolutely cannot happen to Detroit. I make a living guiding the lake for kokanee between the months of April, May, June and July. Most of the kokanee in Detroit are that of wild stock and only a small percentage are hatchery planted. It would be devastating to the population to wipe the wild strain of kokanee out completely. It has taken so many years to get the kokanee population healthy, stable and that of strong numbers to what it is today. It will also affect me financially and the other guides on the lake as that is how we make our money during the spring and summer.

Secondly, when Green Peter was drained, there has not been enough time yet to see if the adult salmon are returning back in stronger numbers yet. We are still a year or 2 away from noticing any difference in returns. So why are you in a rush to test this at Detroit when nothing is proven yet? The drawdown must be put on hold to either confirm or deny that it worked for Green Peter to move onto Detroit Lake drawdown.

Next is the water quality issue below the dams. We all saw what happened to Lebanon and Sweet Home water quality with the massive amounts of turbidity flowing down the river. It was absolutely terrible and caused so many problems and cost a lot of money to fix it. What if this were to happen to Stayton and Salem water quality? It would affect a lot more people than what happened in South Santiam.
This leads into the next problem. There many native fish strains present in the North Santiam during the proposed drawdown. Wild winter steelhead, wild rainbow trout, wild coho salmon and wild chinook salmon. Some of these are ESA listed and protected species, and also are actively spawning in the river when the drawdown is proposed for. You need to take into consideration you may be killing more adult fish in the river while trying to save the salmon smolts coming down out of the lake. More needs to be researched on this before it happens because if you are only saving a few smolts coming out of the lake, yet killing adults already in the river from the high turbidity flows, that makes no sense at all.

In the end, I urge you to either cancel or delay the drawdown until there is more scientific evidence from Green Peter's findings and how it will impact Detroit. Thank you

Logan Ellis
Chicken Little's Guide Service
[redacted]

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Drawdown: Opposition
Date: Tuesday, December 30, 2025 12:36:14 PM

Date: Dec 29, 2025Attn: Liz Oliver, Project Manager

Willamette Valley System Draft Supplemental EIS
333 SW 1st Avenue
Portland, OR 97204
Re: Comments on the Willamette Valley System Operations and Maintenance – Supplemental Environmental Impact Statement (November 2025)

Dear Ms. Oliver:
On behalf of citizens who recreate on Detroit Lake and own property on the Santiam River, we appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for continued operations and maintenance of the Willamette Valley System (WVS).

There is no rigorous scientific evidence that drawdowns will help salmon populations. Conversely, blindly performing a multi year drawdown is definitely something that could devastate the Santiam Canyon economically, and could likely adversly affect water supply systems downstream, costing millions in tourism and repair costs.

We write to express strong opposition to the proposed alternatives, including the Preferred Alternative (Alternative 5), and in particular the inclusion of the late fall/early winter deep drawdown of Detroit Reservoir to elevation 1395 feet, which will have serious adverse consequences for drinking water systems, recreation, the Kokanee fishery, and the broader Santiam Canyon economy. The SEIS fails to adequately characterize these effects and does not demonstrate that the Preferred Alternative will meaningfully benefit ESA-listed fish populations.
Our concerns are outlined below.
1. Detroit Drawdown Impacts Are Significantly

Understated
The SEIS acknowledges that the Detroit deep drawdown will adversely affect water supply, drinking water operations, and recreation (Executive Summary §7.2.2). However, the analysis minimizes the true severity of these impacts:
1.1. Water supply and turbidity impacts
Detroit Reservoir provides and supports municipal and community water supply needs in the region. A deep drawdown invariably reduces available storage volume and may lower reservoir elevations at a time when water demand for downstream communities still

remains. Downstream communities—including Salem, Stayton, Turner, Jefferson, and rural water districts—serve over 200,000 Oregonians who rely on the North Santiam River for drinking water. The SEIS does not provide credible analysis that these systems can withstand prolonged or repeated turbidity spikes. The SEIS states that the drawdown will cause “moderate” increases in sediment and turbidity. This conclusion is not supported by recent empirical evidence:
• The 2023–2024 Green Peter drawdown—conducted for the same purpose and referenced repeatedly in the SEIS—caused catastrophic turbidity levels and an estimated $37–40 million in damage to municipal drinking water systems downstream, particularly for the City of Lebanon and others. Despite this new information, it is absent from the SEIS turbidity analysis and NMFS's 2024 Biological Opinion did not incorporate this data, triggering ESA reinitiation requirements (50 CFR ¬ß402.16(a)(2)).
• The SEIS claims Detroit impacts will be lower due to reservoir morphology, but provides no quantitative sediment modeling, no turbidity projections, no treatment threshold analysis, and no emergency planning framework.
This is insufficient under NEPA’s requirement for “high-quality information and accurate scientific analysis” (40 CFR 1500.1(b)). The SEIS should provide turbidity predictions, sediment load modeling, drawdown-specific geotechnical analyses, and evaluations against Oregon Drinking Water Services turbidity treatment thresholds. We urge USACE to ensure the SEIS clearly assesses:
• The specific reduction in available storage volume resulting from each proposed drawdown scenario (feet of drawdown / acre-feet of loss) and the corresponding reduction in yield available for municipal water supply.
• The timing of drawdown relative to municipal refill needs, hydrologic variability (drought years or low inflow years), and how that could compromise municipal supply reliability.
• Whether municipal supply agreements or commitments are guaranteed or prioritized in the revised operational regime.
• The potential need for emergency water-supply interventions in downstream communities if reservoir elevation remains low through the season.
Without this assessment, proceeding with a deeper drawdown risks placing undue burden on local municipalities and water-users, contrary to the statutory authorized purpose of water supply.
Moreover, the Corps did not include an evaluation of suction dredging to mitigate the impacts of sediment on municipal water systems. As reservoir levels fall, increased turbidity can overwhelm drinking water treatment systems downstream, particularly those that were not designed for continuous high-sediment loads. The SEIS should analyze the feasibility and effectiveness of this concept to ensure that public health and drinking water reliability would be safeguarded.
1.2. Failure to assess public health risks

The SEIS acknowledges potential threats to drinking water reliability (Chapter 3.19) but does not:
• Analyze public health risks should treatment systems become overwhelmed
• Evaluate cyanotoxin mobilization from sediment
• Require contingency plans for emergency water supply
Given that Salem's 2018 algal toxin crisis required statewide emergency action, failure to robustly analyze drinking water vulnerabilities is a significant deficiency.
Without this analysis, NEPA's requirement to evaluate "public health and safety" impacts (40 CFR 1502.16) is not met.
2. Severe Recreational and Economic Impacts Are Not Fully Disclosed
As stated by the SEIS in Chapter 3.14, Detroit Lake is one of the most heavily visited waterbodies in the Willamette Basin. Detroit Reservoir is used heavily for recreation—boating, fishing, camping and tourism—which contributes substantially to the regional economy and quality of life. This is especially important for the rural communities of the North Santiam Canyon, which have struggled to identify areas of economic growth following the decline of the timber industry and are still working to recover from the devastation of 2020's catastrophic wildfires.
A deep fall drawdown would expose larger shoreline areas, reduce boat ramp access, shorten the effective recreation season, diminish reservoir aesthetics, and could destroy the Kokanee fishery. The SEIS acknowledges low summer levels "may" occur in dry years—but this is an understatement:
• The drawdown releases over 150,000 acre-feet of water late in the year, reducing the probability of refill even in average winters.
• The SEIS provides no hydrologic modeling of refill likelihood following the deep drawdown sequence.
• The likelihood of boat ramp inaccessibility, marina closures, cancellation of recreation seasons, and loss of regional tourism revenue is understated.
Again, Detroit and Idanha—already devastated by the 2020 wildfires—depend on recreation for survival. The socioeconomic section of the SEIS relies on regional economic models that mask severe local impacts, failing to capture:
• Business closures
• Loss of tourism-dependent jobs
• Impacts on public services and tax revenue
Chapter 3.14 acknowledges potential recreation loss, but:
• The SEIS does not model refill probability following a 1395' drawdown, despite disclosing that dry years may prevent refill (Executive Summary §7.2.2).

• Socioeconomic modeling uses MSA-level data (Table 3-29), obscuring acute impacts to Detroit, Idanha, and the Santiam Canyon.
• NEPA requires the evaluation of localized effects where impacts are severe (40 CFR 1508.27(b)(3), intensity factor).
Failure to disaggregate economic impact results in an incomplete effects analysis.
The drawdown threatens to prolong and deepen already fragile post-fire community recovery. We recommend that the SEIS include:
• A comparative analysis of recreation access under the current operational regime vs. the deeper drawdown alternative: e.g., number of days shorter the season, number of boat ramps unavailable, shoreline reduction in usable recreation area.
• An estimate of lost economic revenue (in dollars) to recreation-dependent businesses (marinas, lodging, campgrounds, bait/tackle shops) for each drawdown

scenario versus the no-drawdown baseline.
• Mitigation measures or compensatory strategies (e.g., improved ramp infrastructure, seasonal coordination, visitor information) to reduce recreation loss.
• A transparent stakeholder engagement plan involving local businesses, tourism agencies, and recreation users in shaping mitigation.

3. Devastation of the Kokanee Fishery Is Not Adequately Analyzed

The local kokanee (land-locked sockeye) fishery is an important ecological, recreational and economic resource. Lower reservoir levels in the fall and winter will degrade kokanee spawning habitat, reduce refuge areas, increase temperature variability, concentrate predators, and alter food-web dynamics unfavorably. While the draft SEIS emphasizes ESA-listed salmon and steelhead, it gives little attention to kokanee and other fish species that provide an invaluable economic attraction for the North Santiam Canyon.

The SEIS acknowledges that the drawdown will increase entrainment, injury, and mortality of resident fish species—including stocked Kokanee and trout—stating that "significant reductions in abundance" are possible (Executive Summary §7.2.2), however:
• The SEIS minimizes the recreational and economic importance of the Kokanee fishery.
• No population modeling is provided.
• No mitigation measures are proposed.
• No stocking adjustments or survival targets are included.

This does not meet NEPA's requirement for evaluating ecological consequences at a sufficient level of detail (40 CFR 1502.2). The Green Peter drawdown wiped out its Kokanee fishery entirely. The SEIS offers no evidence that Detroit would fare differently.

We urge USACE to:
• Include in the SEIS a focused assessment of the kokanee population dynamics under deeper drawdown conditions (e.g., spawning redd exposure, altered shoreline habitat, cold-water refugia).
• Compare impacts not only to anadromous fish but to resident fisheries whose value is measured locally and regionally.
• Identify monitoring protocols and trigger-points (e.g., kokanee population decline beyond threshold) that would prompt adaptive management.
• Propose mitigation measures (e.g., artificial spawning habitat, refuge water releases, timing of refills) to protect the kokanee fishery alongside the anadromous species goals.

4. The SEIS Does Not Demonstrate That the Preferred Alternative Will Benefit ESA-Listed Fish

The purpose of the Detroit drawdown is to improve volitional downstream passage for juvenile Chinook and steelhead. However, the SEIS:
• Provides no Detroit-specific survival modeling
• Does not analyze effects on egg-to-smolt survival basin-wide
• Acknowledges that downstream passage benefits are limited, seasonal, and involve tradeoffs harmful to other life stages

Additionally, NMFS's own Biological Opinion (2024) was completed without incorporating the massive new information from the Green Peter drawdown disaster, which has thus far show no measurable benefit to endangered fish populations.

• New information invalidates key assumptions of the RPA
• NMFS is obligated under ESA §7(d) to reinitiate consultation when new information reveals effects not previously considered
• The SEIS cannot rely on a flawed Biological Opinion to justify the Preferred Alternative

The SEIS fails to show that the Detroit drawdown meaningfully contributes to salmon recovery, especially given the absence of modeled survival improvements and the lack of long-term passage infrastructure.

We recommend that the Corps significantly expand sediment sampling downstream of existing drawdowns, which have mobilized large volumes of fine sediment. This information is critical because high suspended-sediment loads can smother redds, impair gill function in juvenile salmonids, and reduce aquatic insect production. Without a more comprehensive understanding of how mobilized sediment affects downstream fish habitat and population health, decision-makers and the public cannot fully evaluate the ecological consequences of the proposed operations.

The USACE should not implement a deep drawdown at Detroit Reservoir until it can provide empirical data demonstrating that similar drawdowns—such as the recent operations at Green Peter and other Willamette Basin projects—have produced measurable, biologically meaningful benefits for endangered fish populations. At present, no evidence shows that these actions have definitively improved downstream survival, increased adult returns, or contributed to population recovery goals, while the documented harms to water quality, resident fish, and community water systems are substantial. Before proceeding with another high-risk drawdown, the Corps must present clear, site-specific data proving that these measures are effective and necessary for ESA-listed species recovery.

5. The SEIS Fails to Analyze Reasonable Alternatives

The National Environmental Policy Act requires evaluation of alternatives that avoid or minimize environmental harm. The SEIS should have evaluated:
• Less severe drawdowns
• Modified timing that avoids conflict with drinking water demand cycles
• Fish passage improvements that do not rely on deep drawdowns
• Revised Guide Curve (WCM) optimization, which our organization strongly supports
• Accelerated structural fish passage solutions rather than repeated interim measures

Because these alternatives were not fully considered, the SEIS does not meet NEPA's requirements for a "rigorous and objective evaluation" of alternatives. Given the potential adverse consequences described above, the SEIS should thoroughly evaluate alternative operational regimes that balance fish-passage objectives with water-supply, recreation and resident-fish protections. Specifically:
• Consider less aggressive drawdown alternatives (e.g., reduced depth of drawdown, shorter duration, timing shifts) that yield fish-passage benefit while limiting downstream impacts.
• Incorporate a robust adaptive management framework with defined monitoring, performance metrics, stakeholder review periods and the ability to revert or modify drawdown operations if unacceptable impacts occur.
• Provide for contingency plans for drought years or when municipal supply levels or recreation season viability is already compromised.
• Clarify who bears risk and cost for recreation loss or water-supply shortfall

(USACE, state/local agencies, municipalities, water-users).

6. Requests

Within the SEIS, the U.S. Army Corps of Engineers seems to acknowledge the shortcomings of the proposed drawdown by stating, "…the deep drawdown at Detroit

Reservoir is expected to adversely affect water supply, water quality, drinking water (facility operation), and recreation. The effects of the drawdown on fish are mixed…"

Given the deficiencies of the SEIS and the risks of the actions it proposes, we urge the U.S. Army Corps of Engineers to suspend implementation of the Detroit deep drawdown, until the agency can:

- Request that the Department of Commerce and NMFS rescind and reinitiate the 2024 Biological Opinion, incorporating new information from Green Peter impacts.
- Prepare a new SEIS that
- Conducts full quantitative modeling of sediment, turbidity, refill probability, fish survival, and socioeconomic impacts.
- Evaluates less harmful operational alternatives, including adjustments to the Guide Curve.
- Integrates community-level economic analysis, not just regional modeling.

- Ensure the availability of financial mitigation assistance to compensate local economies and businesses that could be undermined by the drawdown before implementing such a drastic measure.
- Complete the study on turbidity mandated by Congress in 2024 WRDA legislation, before moving forward with a drawdown.
- Engage directly with downstream drinking water providers to evaluate infrastructure risks and protective measures and ensure water systems are prepared for increased turbidity levels.

Conclusion

In closing, while we support the fundamental goal of improving passage for ESA-listed anadromous fish species in the Willamette Basin, we believe the proposed deeper fall drawdown at Detroit Reservoir carries significant risks for municipal water supply reliability, recreation access, and kokanee fishery that together threaten to undermine public health and economic wellbeing of communities throughout the region. The SEIS should not only analyze these impacts thoroughly but also provide concrete mitigation, alternative operational options, ongoing monitoring and stakeholder protections before proceeding.

As outlined above, the SEIS does not sufficiently analyze or disclose the serious risks associated with the Detroit deep drawdown and does not demonstrate that the alternatives, including the Preferred Alternative, would provide measurable benefits to ESA-listed fish populations. The consequences for municipal water systems, public health, recreation, fishery resources, and the already fragile Santiam Canyon communities are severe and unacceptable.

We respectfully request that USACE withdraw or modify the Preferred Alternative and undertake a more comprehensive, scientifically grounded evaluation of impacts and

alternatives. We look forward to continuing engagement in this process and working collaboratively to ensure balanced outcomes.

Thank you for your consideration of these comments.
Sincerely,
Laurie and Brian Coleman
[redacted]

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Drawdown
Date: Friday, January 9, 2026 11:35:34 AM

To Whom It May Concern: I would like to share my concerns about the proposed deep drawdown of Detroit Lake.

As a resident of Detroit, I am extremely concerned this drawdown is going to have detrimental effects on recreation, tourism and economic instability. Our town suffered a devastating wildfire in 2020, and we are still struggling to rebuild and recover. One of the biggest obstacles we face is always the uncertainty of the lake level. Business are reluctant to rebuild without a guarantee of customers. We've had summers where the lake didn't fill and summers where the boating and camping season was much shorter. When these things occur, our tourism dies. Detroit is the most popular lake in Oregon for fishing and water sports.

With Global warming we are seeing less rain and snow each year. And the shade canopy around Detroit has been destroyed from the wildfires so the snow melt occurs rapidly. Using the current rule curve that snow melt is not being captured. I would love to see adjustments made to the curve to accommodate for this. With all of these things happening it's hard to get the lake to full pool and to keep it recreational levels during the late summer months.

Summer months are critical as we see wildfires on the rise having a full lake gives ample Firefighting protection resources. Empty reservoirs in California last year led to even more devastating wildfire damages.

The North Santiam river also provides the drinking water to the cities below the canyon there are serious concerns about water turbidity and storage. Oregon has been in a drought for over 100 years, and these conditions just seem to be worsening. It would make more sense to store as much water as possible. Water is becoming a scares commodity, and we should be figuring out all possible means of storing it.

This year we are already seeing a warmer and dryer fall/winter with very little snow in the mountains. Unless we have a very wet spring we are going to be in severe drought like conditions.

I would also like to see Scientific data supporting these drawdowns. Are we actually seeing a rise in Salmon populations? I do not want Detroit to turn into another Green Peter Reservoirs Disaster!
We have a large Kokanee population that draws in a large number of anglers each year and I would hate to see the Kokanee whipped out.

I would also like to see the Turbidity testing completed before this is implemented safe drinking water for the communities downstream should be first and foremost!

Thank you for allowing me to share my concerns.

Sincerley,
Tracie Evenson

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Reservoir Drawdown
Date: Sunday, December 28, 2025 9:01:46 AM

Hello USACE,

Please respond to the following questions at your earliest opportunity.

1. We have been informed and makes perfect sense that it will be imprudent for USACE should you move forward with any drawdown until the Corps revises the EIS to address how fine sediment will impact the drinking-water systems on the North Santiam.

a. How will you handle this situation?
b. How long do you expect this to be?
c. Making a study might take a while. Do you have any timeline?

2. I am requesting for a comprehensive modernization of the Endangered Species Act. We can and should protect some species, but it is common sense to say that we must do so in a way that does not steamroll rural communities or jeopardize essential public services like drinking water. a.

a. How will you handle this situation?
b. Has this already been assessed and do you agree? Again, do you agree and intend to rely more on common sense going forward?

Kaethe Menrum
Secretary/Park Chair
Northgate Neighborhood Association

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Reservoir Drawdown
Date: Wednesday, January 14, 2026 10:59:36 AM
Importance: High

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette SEIS
P.O. Box 2946
Portland, OR 97208-2946

My testimony is short concerning the Detroit Reservoir Drawdown;

I support:

1. A slow drawdown
2. Mitigation of any potential flooding issues #1
3. Clean drinking water #2
4. Protect the small fish #3
5. Consider recreation last.

In my opinion, People are most important, fish are second and recreation is last.

I have lived in Salem for over 25 years and my drinking water comes from the reservoir water. Yes, we have had some issues some years and we survivde it. I trust the Army Corps will do the best they can.

Thank you,
K Rogers
Salem, OR

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] EIS and Revetment Mapping
Date: Tuesday, January 6, 2026 11:17:09 AM

Hello,

I am reaching out to inquire about the availability and development history of revetments and/or levees along the Santiam River. Specifically, we are trying to determine whether revetments were constructed along portions of the river. We have a suspicion that some revetments may have been built as part of an Environmental Impact Statement (EIS) related to the Detroit Reservoir drawdown.

We are also interested in whether any maps have been created that show the locations of these revetments and/or levees, either in GIS format (e.g., shapefiles or geodatabases) or as paper or scanned maps.

Thank you for your time and assistance. Please let me know if you need any additional context regarding our request.

Best regards,

Greg Drozdiuk | GIS Technician
Santiam Water Control District
284 East Water Street | Stayton, Oregon 97383
[redacted]
www.santiamwater.gov

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From: [redacted]
To: CityRecorder; CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Leave Detroit Lake alone - Activists need to get a job
Date: Tuesday, January 13, 2026 3:41:22 PM

Hello Army Corps and City of Salem,

Putting so much at risk because of fish that activists are using as an excuse is simply not fair. The risks are many but the ones that I'm most concerned about are negative impact on water quality downstream, impacts on the Detroit economy, killing of so many Kokanee and other local fish, as well as messing with water levels in an area that is prone to wild fires all while we already lost so much of our trees during the 2020 fires which is causing changes in the areas climate.

'Natives' are looking to destroy what was built and they will not stop at drawdowns, they want to blow up our aim, and you should know that.

Activists like these messed with our logging industry not long ago, which still has a negative impact on our States economy, and time showed that logging wasn't hurting the 'endangered species' that they were 'protecting', it was actually a predator that still thrives. Activists need to get a job, and work like we do over here and stop wasting our time and money.

Leave our Reservoir alone.

Thank you,
Jess Martin
Detroit resident

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Saturday, January 10, 2026 11:11:01 AM

Dear U.S. Army Corps of Engineers,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Willamette Valley System.

I'm writing to support actions that meaningfully improve conditions for wild, native salmon and steelhead in the Willamette River Basin. I specifically support the annual fall deep drawdown at Detroit Reservoir, and I urge the Corps to strengthen and expand the alternatives it considers in the SEIS.

1. Support the Deep Drawdown at Detroit Reservoir

I strongly support the Corps' proposal to draw down Detroit Reservoir each fall to improve downstream passage for juvenile fish. This is one of the most effective operational tools available to help spring Chinook and winter steelhead survive their migration to the ocean.

The Corps' proposed three-year phased approach to gradually deepen the drawdown is a smart, science-based strategy to reduce downstream sediment and water-quality impacts. Please continue prioritizing this measure, refine it with the best available science, and ensure it becomes a consistent annual practice.

2. The Corps' Alternative 6 Falls Short of What Congress Intended

By analyzing only one "no-hydropower" alternative, the Corps has limited the public's ability to understand what's truly possible for fish recovery. Alternative 6 removes all hydropower infrastructure but keeps the same costly and likely ineffective fish-collection facilities from the preferred alternative. This does not reflect the full range of options Congress expected when it required the Corps to study ending commercial hydropower in the Willamette system.

What's missing is a dam-by-dam analysis of other viable approaches—such as leaving hydropower infrastructure in place but no longer generating commercial power. Without these options, decision-makers and the public don't have the information needed to choose a plan that will actually help native fish recover.

3. Expand the Analysis of What Is Possible Without Commercial Hydropower

The Draft SEIS does not fully examine the range of options that become available if commercial hydropower is removed from Willamette Valley dams. Since Congress has required the Corps to analyze a "no hydropower" alternative, the final SEIS should explore more than one narrow version.

Please expand the "no hydropower" analysis to consider the full suite of fish-focused options, including:

-More flexible and seasonally variable drawdown schedules

-Additional deep-drawdown opportunities at other reservoirs

-A wider range of flow and temperature management strategies

-Removal or alternative operations like run of river of reregulating dams, which exist solely to support hydropower production and impede fish recovery

Exploring these alternatives is essential for meeting Endangered Species Act obligations and reducing the long-term need for expensive and ineffective fish-collection facilities.

The SEIS should evaluate all reasonable actions that could help restore native fish populations —not just those that fit within traditional operational constraints. A broader range of alternatives will give the public, the resource agencies, and Tribal governments a clearer sense of what dam operations could look like if fish recovery were the central goal.

Thank you for considering these comments. I urge the Corps to produce a Final SEIS that fully explores the options needed to recover wild salmon and steelhead while moving toward a more resilient and ecologically healthy Willamette River Basin.

Sincerely,

Noah Jenkins

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Friday, January 9, 2026 1:39:52 PM

Dear U.S. Army Corps of Engineers,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Willamette Valley System.

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Thank you for considering these comments. I urge the Corps to produce a Final SEIS that fully explores the options needed to recover wild salmon and steelhead while moving toward a more resilient and ecologically healthy Willamette River Basin.

Sincerely,

Richard Curtis

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Friday, January 9, 2026 12:11:41 PM

Dear U.S. Army Corps of Engineers,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Willamette Valley System.

I'm writing to support actions that meaningfully improve conditions for wild, native salmon and steelhead in the Willamette River Basin. I specifically support the annual fall deep drawdown at Detroit Reservoir, and I urge the Corps to strengthen and expand the alternatives it considers in the SEIS.

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Exploring these alternatives is essential for meeting Endangered Species Act obligations and reducing the long-term need for expensive and ineffective fish-collection facilities.

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Thank you for considering these comments. I urge the Corps to produce a Final SEIS that fully explores the options needed to recover wild salmon and steelhead while moving toward a more resilient and ecologically healthy Willamette River Basin.

Sincerely,

Bryan Mullaney

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Friday, January 9, 2026 9:34:37 AM

Dear U.S. Army Corps of Engineers,

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Sincerely,

Sean Bistoff

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Friday, January 9, 2026 6:44:54 AM

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Sincerely,

Peter Brewer

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Friday, January 9, 2026 5:53:32 AM

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Sincerely,

Jacob Young

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Thursday, January 8, 2026 11:19:36 PM

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Sincerely,

Steve Baker

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Thursday, January 8, 2026 11:01:30 PM

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Sincerely,

KAREN ERDE

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Thursday, January 8, 2026 10:34:43 PM

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Sincerely,

Teresa MOREHOUSE

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Thursday, January 8, 2026 9:50:30 PM

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Stephen Oder

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Sincerely,

Duncan Kerst

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Thursday, January 8, 2026 8:56:58 PM

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Barrett Edgar

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Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Thursday, January 8, 2026 7:52:55 PM

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What's missing is a dam-by-dam analysis of other viable approaches—such as leaving hydropower infrastructure in place but no longer generating commercial power. Without these options, decision-makers and the public don't have the information needed to choose a plan that will actually help native fish recover.

3. Expand the Analysis of What Is Possible Without Commercial Hydropower

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Please expand the "no hydropower" analysis to consider the full suite of fish-focused options, including:

-More flexible and seasonally variable drawdown schedules

-Additional deep-drawdown opportunities at other reservoirs

-A wider range of flow and temperature management strategies

-Removal or alternative operations like run of river of reregulating dams, which exist solely to support hydropower production and impede fish recovery

Exploring these alternatives is essential for meeting Endangered Species Act obligations and reducing the long-term need for expensive and ineffective fish-collection facilities.

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Thank you for considering these comments. I urge the Corps to produce a Final SEIS that fully explores the options needed to recover wild salmon and steelhead while moving toward a more resilient and ecologically healthy Willamette River Basin.

Sincerely,

Sean Brady

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Thursday, January 8, 2026 7:15:32 PM

Dear U.S. Army Corps of Engineers,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Willamette Valley System.

I'm writing to support actions that meaningfully improve conditions for wild, native salmon and steelhead in the Willamette River Basin. I specifically support the annual fall deep drawdown at Detroit Reservoir, and I urge the Corps to strengthen and expand the alternatives it considers in the SEIS.

1. Support the Deep Drawdown at Detroit Reservoir

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Sincerely,

Erick Petersen

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Thursday, January 8, 2026 7:09:29 PM

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Sincerely,

Jordan Farina

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Thursday, January 8, 2026 7:06:42 PM

Dear U.S. Army Corps of Engineers,

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Sincerely,

Joseph Welch

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Monday, January 5, 2026 7:49:48 AM

Dear U.S. Army Corps of Engineers,

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Sincerely,

Laurel Williams

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Sunday, January 4, 2026 6:39:09 PM

Dear U.S. Army Corps of Engineers,

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Sincerely,

Alan L'Hommedieu

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Wednesday, December 31, 2025 7:57:41 AM

Dear U.S. Army Corps of Engineers,

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Sincerely,

Kristine Green

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Tuesday, December 30, 2025 2:54:45 PM

Dear U.S. Army Corps of Engineers,

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Sincerely,

Debra Abbott

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] My view on Deep Drawdowns, Healthy Rivers: Support Stronger Actions for Willamette Salmon & Steelhead
Date: Tuesday, January 13, 2026 10:00:43 AM

Dear U.S. Army Corps of Engineers,

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Sincerely,

Steven Novotny

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Opposition to Deep Drawdown of Detroit Reservoir (WVS SEIS)
Date: Tuesday, December 30, 2025 1:50:16 PM

Opposition to Deep Drawdown of Detroit Reservoir (WVS SEIS)

On behalf of residents, recreation users, and property owners in the Santiam Canyon, we submit comments on the Draft Supplemental Environmental Impact Statement (SEIS) for the Willamette Valley System.

We strongly oppose the proposed deep late-fall/early-winter drawdown of Detroit Reservoir—particularly the Preferred Alternative (Alternative 5)—because it poses serious, inadequately analyzed risks to drinking water, public health, recreation, local economies, and resident fisheries, without credible evidence of meaningful benefit to ESA-listed salmon.

Key concerns:

1. Drinking water and public health risks are understated.
More than 200,000 Oregonians rely on the North Santiam River for drinking water. The SEIS fails to meaningfully address turbidity risks from deep drawdowns, despite the 2023–24 Green Peter drawdown causing catastrophic turbidity and an estimated $37–40 million in damage to downstream water systems. The SEIS provides no sediment modeling, turbidity projections, refill probability analysis, or contingency planning for municipal water systems. This does not meet NEPA's requirement for high-quality scientific analysis.

2. Severe local economic and recreational impacts are minimized.
Detroit Lake is one of the most heavily used recreational reservoirs in the Willamette Basin and is essential to the recovery of Detroit and Idanha following the 2020 wildfires. A deep drawdown would shorten recreation seasons, eliminate boat ramp access, damage tourism, and threaten community survival. The SEIS relies on regional economic models that obscure severe localized impacts and provides no refill modeling to assess whether summer recreation levels can be restored.

3. Kokanee fishery impacts are ignored.
The SEIS acknowledges potential "significant reductions" in resident fish but offers no population modeling, mitigation, or monitoring for the kokanee fishery—a critical ecological and economic resource. The Green Peter drawdown effectively eliminated its kokanee fishery, yet the SEIS offers no evidence Detroit would fare differently.

4. No demonstrated benefit to ESA-listed fish.
The SEIS provides no Detroit-specific survival modeling and relies on a 2024 NMFS Biological Opinion that did not incorporate new data from Green Peter. There is currently no empirical evidence that deep drawdowns have produced measurable improvements in salmon survival or recovery, while documented harms are substantial.

5. Reasonable alternatives were not adequately analyzed.

The SEIS fails to rigorously evaluate less harmful alternatives, including shallower or shorter drawdowns, timing changes, Guide Curve optimization, or non-drawdown fish passage solutions, as required by NEPA.

Request:
We urge the U.S. Army Corps of Engineers to suspend implementation of the Detroit deep drawdown until it can:

- Reinitiate ESA consultation using updated Green Peter data
- Conduct quantitative modeling of turbidity, sediment, refill probability, fish survival, and localized economic impacts
- Fully evaluate less damaging operational alternatives
- Complete the turbidity study mandated by Congress
- Engage directly with downstream drinking water providers and affected communities

We support salmon recovery, but not at the expense of public health, drinking water reliability, local economies, and resident fisheries—especially without evidence the proposed action works.

Respectfully,

Shelley Shirley
[redacted]

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Planned drawdown of Detroit Lake
Date: Monday, January 12, 2026 4:03:19 PM

I realize you don't want to hear we don't want this but if you truly believe that you want community involvement you need to acknowledge this is not a great idea for Detroit Dam and the North Santiam River .It seems you have had enough problems trying to do this in the Sweet Home/Lebanon area with catastrophic problems. Why would you even try this knowing you're affecting even more people? Are you footing the bill for all the problems cities downstream will have with their water? You are forcing something on them that they did not ask for.

I do not understand why you cannot use the fish hatcheries for helping this salmon population. Isn't that one of the reasons they exist? Also why is this one species more important than others? Weren't a lot of kokanee wiped out in the Sweet Home/Lebanon project?

Now an even more important question - why is one species of fish more important than people - especially when there are other ways to help them. If this happens it will more than devastate the economy of Detroit and on down the river. These poor people in Detroit have been through enough economic problems in the last few years - drought, fires, etc. Which leads to my next question - isn't it dangerous to lower the waters during the most hazardous time for fires?

I know humans need to look out and respect nature but this is going overboard. Environmentalists in Oregon need to step back and look at things from other people's perspective. There's got to be a better way.

Thank you for your time.

Dawn Plotts
[redacted]

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Cc: "Rep Diehl"
Subject: [Non-DoD Source] Requesting answers and comments
Date: Monday, December 22, 2025 5:14:51 PM

Some of these require comments, not just answers. Please do so at your earliest as we would like to share with our community in Salem. We are all very concerned.

1. If you drain from the upper regulating outlets located close to the bottom, if there are sediment like ash from the fire which are fine and toxic, wouldn't the draining cause those sediments to run out to North Santiam River?
2. Wouldn't the turbulency caused by water draining out stir the rest of the water in the dam and cause a toxic and ill effect towards the fish that are there?
3. Wouldn't the draining of the upper regulating outlet which is located about 200 feet below the 463 foot Detroit dam cause non-use of the electrical connections which is located at about 100 feet down? These will no longer be usable since it will be dried up. Having no electricity should not be an option. Salem, Stayton, Detroit City and others around will need electricity obviously and it is for USACE to determine how and be responsible, not other electric companies to know what to do to keep electricity flowing at all times.
4. The proposed drawdown is 50 feet above the highest regulating outlet, so the fish will have to swim down 50 feet to get out through the upper outlets. According to Google, the smolt's capacity to go down is at most 40 feet, not 50 feet. Remember they are juveniles and their young bodies are not equipped well like the adults.
5. The way the dam is constructed, the concrete juts out and without enough water to cushion them, these juveniles will possibly die from either shock or hitting the concrete.
6. We were informed USACE is hoping there will be less sediment each time you go down within the next three years. Just because you draw down a little more each year, it's not going to clear the sediment. What are you going to do to clear up each time?
7. Why can't you perform the old way of trucking them to the river. Whether it's inefficient or not, it may be more effective than killing the juvenile fish, safer doing an expensive drawdown which could badly affect the communities of Salem, Stayton, Detroit City and highly possible to kill many smolt that could not escape. They could also kill resident fish like trout, large and small as well as Kokanee salmon unless they get transferred to another location.

We realize this is the holiday season and we hate to bother you at this time, however, our community is concerned. The timing of the questions to be answered is December 29th which is during the holiday season so we don't have much choice but to ask now. Thank you.

Bayard Mentrum and Kaethe Mentrum

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Stop the Deep drawdown at Detroit Reservoir
Date: Tuesday, December 23, 2025 10:12:45 AM

To Whom it Concerns,

Being a lifelong resident of the Santiam Canyon, I urge you NOT to move forward with this flawed drawdown, The risk of damage to the downstream residents and cities is too large to offset the few smolts that will pass through the gates of the dam. For years the North Santiam river was world recognized as a stellar salmon and steelhead river. Which brought sportsmen and their families from across the globe to stay and visit our communities. Then along came the environmentalist that said only wild fish need to be in the river. They made up all sorts of reasons why hatchery fish are bad for this river. While in fact what they were calling wild fish were actually hatchery fish that have endured the decades of hatchery rearing and release. We are beyond shutting the door after the horse if out and should be concentrating on hatchery improvement and education of the public. The Corp said that they would replace and supplement the fish population that would be interrupted by the dams. The Corp let the public down by not keeping up with the fish stock and education of the public that Hatchery and Wild can coexist.

Richard and Linda Ackerma
[redacted]
Stayton Or

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Stronger Action Is Needed to Help Native Salmon and Steelhead Recover -- Willamette Valley System Operations and Maintenance: Draft Supplemental Environmental Impact Statement
Date: Tuesday, January 13, 2026 8:44:34 AM

Tuesday, January 13, 2026

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946 Portland, OR 97208-2946

Subject: Stronger Action Is Needed to Help Native Salmon and Steelhead Recover -- Willamette Valley System Operations and Maintenance: Draft Supplemental Environmental Impact Statement

To 56th Chief of Engineers and Commanding General of the U.S. Army Corps of Engineers Lieutenant General William H. "Butch" Graham, Jr., USACE Northwestern Division Commander Brigadier General William C. Hannan, Jr., and USACE Portland District Commander and District Engineer Col. Larry Dale Caswell, Jr.:

I strongly support actions proposed in the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Willamette Valley System that meaningfully improve conditions for wild, native salmon and steelhead in the Willamette River Basin. I specifically support the annual fall deep drawdown at Detroit Reservoir, and I urge the Corps to strengthen and expand the alternatives it considers in the SEIS.

> *“A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise.”*
> *-- Aldo Leopold*

Support for the Deep Drawdown at Detroit Reservoir
I strongly support the Corps’ proposal to draw down Detroit Reservoir each fall to improve downstream passage for juvenile fish. This is one of the most effective operational tools available to help spring Chinook and winter steelhead survive their migration to the ocean.

The Corps’ proposed three-year phased approach to gradually deepen the drawdown is a smart, science-based strategy to reduce downstream sediment and water-quality impacts. Please continue prioritizing this measure, refine it with the best available science, and ensure it becomes a consistent annual practice.

The Corps’ Alternative 6 Falls Short of What Congress Intended
By analyzing only one “no-hydropower” alternative, the Corps has limited the public’s ability to understand what’s truly possible for fish recovery. Alternative 6 removes all hydropower infrastructure but keeps the same costly and likely ineffective fish-collection facilities from the preferred alternative. This does not reflect the full range of options Congress expected when it required the Corps to study ending commercial

hydropower in the Willamette system.

What's missing is a dam-by-dam analysis of other viable approaches—such as leaving hydropower infrastructure in place but no longer generating commercial power. Without these options, decision-makers and the public don't have the information needed to choose a plan that will actually help native fish recover.

Expand the Analysis of What Is Possible Without Commercial Hydropower
The Draft SEIS does not fully examine the range of options that become available if commercial hydropower is removed from Willamette Valley dams. Since Congress has required the Corps to analyze a "no hydropower" alternative, the final SEIS should explore more than one narrow version.

Please expand the "no hydropower" analysis to consider the full suite of fish-focused options, including:

- More flexible and seasonally variable drawdown schedules
- Additional deep-drawdown opportunities at other reservoirs
- A wider range of flow and temperature management strategies
- Removal or alternative operations like run of river of reregulating dams, which exist solely to support hydropower production and impede fish recovery

Exploring these alternatives is essential for meeting Endangered Species Act obligations and reducing the long-term need for expensive and ineffective fish-collection facilities.

The SEIS should evaluate all reasonable actions that could help restore native fish populations—not just those that fit within traditional operational constraints. A broader range of alternatives will give the public, the resource agencies, and Tribal governments a clearer sense of what dam operations could look like if fish recovery were the central goal.

> *"The ultimate test of a moral society is the kind of world that it leaves to its children."*
> *-- Dietrich Bonhoeffer*

Thank you for considering these comments. I urge the Corps to produce a Final SEIS that fully explores the options needed to recover wild salmon and steelhead while moving toward a more resilient and ecologically healthy Willamette River Basin.

Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA

From: [redacted]
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] WVS EIS Public Comments
Date: Monday, January 12, 2026 11:28:01 AM

I'm writing to say please don't experiment with our fish, our fisheries and our economy. It's insane that the army corp is considering a Detroit drawdown without researching the impacts on not just our fisheries and our wild fish population but on what impact it would have on local drinking water. Please don't experiment, do the research or don't do the drawdown

1) Impacts to local fisheries.
What is the impacts doing a drawdown would have on our local fisheries and our local economy. Not just the fisheries at the lake but all the fisheries down stream of Detroit. What's the impact on all the fisheries and business that make a living on the fisheries. I will tell you that a drawdown will have a massive negative impact on all of these and if the army corp hasn't done a financial impact study of what this will do to our economic systems PLEASE DON'T DRAWDOWN.

2) Summer recreation
Detroit has a massive summer recreation season. Where people use the lake for camping, boating and lots of non fishing recreation. If the army corp hasn't done a financial impact study on the economic impact of removing this recreational activities DON'T DRAWDOWN.

3) I know city of Salem has sent out warnings to its users about possible negative impacts of sediments clogging their water pipes. But what about the heavy metals and other contamination getting into the drinking water. If you have done environmentally impact studies on what it will do to downstream drinking water and water systems PLEASE DON'T DRAWDOWN.
4) We have worked for years to rebuild wild winter steelhead populations on the north Santiam and mainstem on the Santiam. What damage will a drawdown do to silting in their spawn beds. Choking the life out of their offspring ? What damage will you do to this threatened wild population by doing a drawdown? If you haven't done an environmental impact study and know the exact answer to this question. PLEASE DON'T DRAWDOWN.
5) We are being told you want to do a drawdown to save some wild spring chinook smolts. But what about all the spring chinook that spawn in the North santiam and mainstem what impact will the drawdown have on those fish, their spawning beds and their offspring. I will tell you, you and killing thousands of fish to save a small handful. If you haven't done an environmental impact study and know the exact answer to this question. PLEASE DON'T DRAWDOWN.
6) The North Santiam and mainstem have one of the best wild trout populations in the state of Oregon. Running all of this sediment down through the water they live, feed and bread in will be devastating. Filling in their spawning beds. How many of these fish will the drawdown kill. If you haven't done an environmental impact study and know the exact answer to this question. PLEASE DON'T DRAWDOWN.
7) All of the above wild fish populations rely on a healthy aquatic insect life that the Santiam systems has a healthy and unique population. This is a delicate ecosystem that supports all of the fish populations in addition to its own health. The biggest danger to this ecosystem is water quality and sedimentation. If you haven't done an environmental impact study as to how the drawdown will impact this ecosystem. PLEASE DON'T DRAWDOWN.

8) In 2023 we had 65k wild coho return to the Willamette River above Oregon city falls. Largest return on record. That year the Army corp did a drawdown on green peter making the entire south santiam, mainstem and the willamette below the mainstem unfishable. Meaning we had record returns but couldn't fish on them. I asked above what damage did the drawdown have on their offspring and their spawning beds. But how were license sales impacted by this drawdown. How many less dollars did odfw have and how was that agency damaged by your decision?

If you haven't studied the economic impact of that and haven't studied the environment impact and damage done to these fish. Please don't experiment and just see what happens

I've asked a ton of people question about what will happen to each of these populations and what is the economic and ecological impacts. And no one can answer any of these questions adequately let alone answer all of them.

So if you don't have answers and haven't done the studies you are just experimenting on our ecosystems and economies. Please don't experiment and don't do the drawdown

Scott Amerman

Oregon anglers alliance board member and board member for Siletz angler

From: [redacted]
Subject: [Non-DOD Source] your order in 18-cv-00437-HZ violates several section of Clean water act.
Date: Wednesday, December 24, 2025 6:29:26 PM
Attachments: image001.png
Importance: High

The ruling said to drain the dam to release the massive silt behind it (The silt is around 775 feet tall according to an Operator of the dam). The result was dark colored water running from Linn County their faucets. The clean water act specifically prevents this: the provisions of the Federal Water Pollution Control Act, specifically 33 U.S.C. 1251 a. 1-7. This is also 42 USC CHAPTER 6A, SUBCHAPTER XII: SAFETY OF PUBLIC WATER SYSTEMS.

The clean water act prevents discharge of silt from any dam. Specifically Section E 1 as the required public meetings for this single subject were not scheduled. No Judge can violate this. https://www.epa.gov/cwa-404/overview-clean-water-act-section-404

Neither the Secretary of War or Secretary of Commerce has approved this drawdown.

Therefore, an injunction to stop the illegal drawdown is required by federal law.

Plaintiff and Class action members humbly request the Federal Court to vacate by FRCP 60 (2) the erroneous ruling in 18-cv-00437-HZ.

As of November 3rd 2025 No Dam in the USA or its territories may be removed or have its turbines removed without specific permission of salmonprotectiondevice.com

The 2008 and 2024 Biological Opinions are junk science and void. https://salmonprotectiondevice.com/Dam_Removal_Application.pdf

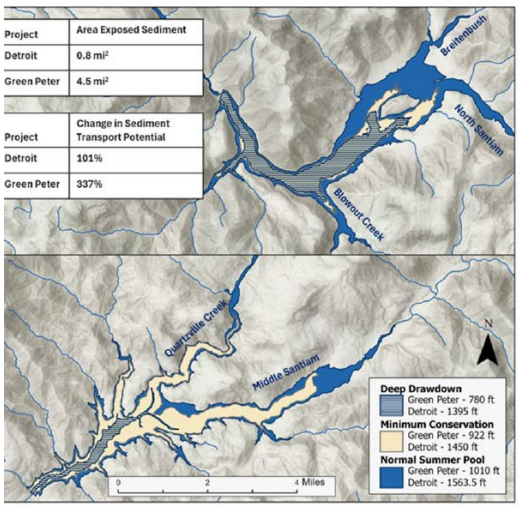
https://salmonprotectiondevice.com/Dam_removal_Approval_Procedure.pdf

https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25-5808.html
Nov 06 2025 DISTRIBUTED for Conference of 11/21/2025.

Nov 03 2025 Waiver of right of respondent FERC to respond filed.
Main Document

Attorneys for Respondent
D. John Sauer
Counsel of Record
Solicitor General
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
SUPREMECTBRIEFS@USDOJ.GOV
Ph: 202-514-2217
Party name: FERC

Potential Deep Drawdown Impacts



Green Peter and Detroit Drawdown Areas

Source: US Army Corps of Engineers

Santiam River Confluence during the 2023 deep drawdown of Green Peter Dam.

No legal or scientific reason to remove any dam. Fish ladders work. The sea lions are the almost 1:1 ratio to the decline of the salmon in the Columbia river. Our salmon protection device attached to the down stream fish ladders will fix declining salmon runs within seven years, salmonprotectiondevice.com 503-608-7611 x602
Reality is that which when taken away still exists.

From:	Lee W. Loving
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Lee W. Loving
Subject:	[Non-DoD Source] Detroit Dam Drawdown Lett from North Santiam School Distirct 29J (2nd Attempt)
Date:	Thursday, January 15, 2026 6:30:05 PM
Attachments:	2025 - Detroit Lake Drawdown Letter.pdf

Dear U.S. Army Corps of Engineers Representative -
Please accept the attached letter from the Board of Directors of the North Santiam School District 29J. located in Stayton, Oregon. (As we have not received confirmation that our first attempt was received).

Thank you,

Lee W. Loving
Superintendent | North Santiam School District 29J
P: 503.769.4928 | F: 503.769.3578
lee.loving@nssd29j.org The North Santiam School District is committed to equal opportunity and non-discrimination in all of its educational and employment activities. The District does not discriminate on the basis of race, color, national origin, sex, sexual orientation, religion, disability, marital status, or age in its programs and activities.

North Santiam School District 29J

Serving Lyons, Mehama, Stayton, and Sublimity

Date: December 18, 2025

To: U.S. Army Corps of Engineers
Attn: CENWP-PME-E /
Willamette SEIS
P.O. Box 2946
Portland, OR 97208-2946
willamette.eis@usace.army.mil

Re: Proposed Detroit Dam Drawdown

Dear Representative,

We, the North Santiam School District 29J School Board and Superintendent, are writing to express our deep concern regarding the proposed Detroit Lake Reservoir drawdown and the severe consequences it poses for our water supply, community stability, and the North Santiam School District's school operations. This drawdown proposal threatens not only the environmental and economic well-being of our community but also the basic daily function of our local schools and essential public services.

A reservoir drawdown would significantly increase turbidity levels, overwhelming water treatment facilities across the Santiam Canyon and the Willamette Valley. Salem's system is particularly vulnerable, and a failure upstream would cascade downstream. We have been advised that our city water system in Stayton could be shut down for up to two months due to poor water clarity.

This would have an immediate, critical impact on our school district's operations. Without running water, schools cannot operate safely. To stay open, we would be forced to bring in a large number of porta-potties for every school site, assuming sufficient units could even be sourced. It is likely that statewide shortages would occur as multiple districts, including Salem-Keizer, compete for the same emergency supplies.

Additionally, our schools would need to secure massive quantities of potable water every day for drinking, food service, and basic sanitation. This would be extremely costly and would present major logistical challenges. Students with health conditions requiring access to clean water would be placed at significant risk. Together, these porta-potties, hand-washing stations, potable water, and associated service and maintenance needs are anticipated to have limited vendor availability and are estimated to exceed $200,000 over a two-month period.

If water service is interrupted, the district has been warned that we may be unable to operate schools for up to two months. Even if we attempted to remain open:

- Students in grades 9–12 may be required to shift to online learning, which would create significant instructional, scheduling, and access challenges.

North Santiam School District 29J

Serving Lyons, Mehama, Stayton, and Sublimity

- Students in grades K–8 do not have district-issued Chromebooks. Emergency distribution and securing portable Wi-Fi hotspots would be chaotic and time-consuming and would not address students' lack of access to running water at home.
- Students across Oregon, including those in the NSSD, experienced significant disruptions to their learning during the pandemic, particularly in reading and math. The shift to asynchronous, at-home instruction led to significant and measurable learning loss. Our students should never have to experience that level of interruption again.
- School meal service would be disrupted entirely; we cannot prepare food safely without potable water.
- The operational toll on staff, facilities, budgets, and student learning would be catastrophic.

This level of disruption demands advance planning that is currently impossible without clear timelines and guarantees about water availability. The educational, financial, and public health consequences of this proposal are overwhelming.

A full reservoir is also critical for firefighting capability. With the loss of forest canopy following recent Canyon wildfires, snowpack is melting earlier, and runoff patterns have changed dramatically. The outdated reservoir fill curve does not reflect current hydrologic realities. Reducing reservoir storage will further destabilize a system already stressed by climate impacts. A drawdown leaves our NSSD communities with fewer resources during peak wildfire season—putting homes, infrastructure, and lives at heightened risk.

Every reservoir in the Willamette system faces similar vulnerabilities. Reducing water storage increases costs, strains infrastructure, and puts entire communities at risk. Oregonians cannot absorb higher utility bills, weakened water reliability, school closures, or further loss of critical infrastructure.

For the sake of public health, community safety, and educational stability, we respectfully request that decision-makers reject this Detroit Lake Reservoir Drawdown proposal and pursue solutions that protect both our water system and the communities that depend on it.

Thank you for your attention to this urgent matter.

Sincerely,

Mackenzie Strawn
NSSD Board Chair

Alisha Oliver
NSSD Vice-Chair

Lee W. Loving
NSSD Superintendent

Brunk Conley
NSSD Board Member

Erin Cramer
NSSD Board Member

Coral Ford
NSSD Board Member

Mark Henderson
NSSD Board Member

Mike Wagner
NSSD Board Member

1155 N 3rd Ave, Stayton, Oregon 97383
P: 503.769.6924 ~ F: 503.769.3578
www.nssd29j.org ~ **communications@nsantiam.k12.or.us**

From:	Melanie Klym
To:	CENWP-PME-Williamette-Valley-System-EIS
Subject:	[Non-DoD Source] RE: CENWP-PME-E / Willamette EIS - American Rivers" Comments
Date:	Wednesday, January 14, 2026 1:16:54 PM
Attachments:	Outlook-sbky2h0r.png Outlook-gqxjsl3s.png 2026-01-13 American Rivers comments on WVS SEIS.pdf

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Good afternoon,

Attached please find American Rivers' comments on the Draft Supplemental Environmental Impact Statement for the Operations and Maintenance of the Willamette Valley System. Thank you and please let me know if you have any questions or need additional information.

Sincerely,

--Melanie C. Klym

Melanie Klym (she/her)
Northwest River Restoration Director
503-827-8653
AmericanRivers.org
Instagram | Facebook | Twitter

Help ensure every river in our country is clean and healthy for people and wildlife. Take action for America's Most Endangered Rivers® of 2025

Book time to meet with me

January 13, 2026

RE: Willamette Valley System Draft Supplemental Environmental Impact Statement

Dear Ms. Warner:

American Rivers appreciates the opportunity to provide comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Willamette Valley System (WVS). We value the Corps' efforts in evaluating interim operations, addressing hydropower considerations, and responding to the requirements of the Thomas R. Carper Water Resources Development Act of 2024.

American Rivers is a national conservation organization working to make every river clean and healthy for people and wildlife. We combine evidence-based solutions with enduring partnerships to safeguard the 4.4 million miles of rivers and streams that are essential to our nation's clean drinking water, extraordinary wildlife, and the strength of our communities. For more than 50 years, our staff, supporters, and partners have been driven by a common belief: Life Depends on Rivers.

We respectfully submit the following comments for consideration in the Final Supplemental Environmental Impact Statement (FSEIS).

1 Interim Operations

We acknowledge and support the detailed descriptions of interim and non-hydropower operations provided in Appendix A (Sections 2.6 and 2.9.2). In particular, we support the deep drawdowns at Detroit Dam and the phased operational approach designed to protect downstream water quality (Appendix A, Section 2.9.3). We also appreciate the recognition that sediment conditions at Detroit differ notably from those at Green Peter and Foster.

We recommend expanding the analysis to address effects on **all** native fish species[1]—not only migratory species—and to include discussion of how riverine conditions during deep drawdowns may influence non-native warmwater species.

[1] https://seagrant.oregonstate.edu/WRF/Native-Fishes

2 Ceasing Federal Hydropower Operations

2.1 Completeness of Alternative Development

Alternative 6 is not developed to a level sufficient for full environmental evaluation. The analysis focuses primarily on structural decommissioning rather than on the enhanced operational flexibility that would result from removal of the hydropower pool requirement. Eliminating this constraint directly supports Objective 1, yet Appendix A, Table 1-3 identifies Alternative 6 as meeting only Objectives 2, 4, 5, 6, and 7. The Corps should revise this scoring to accurately reflect the operational benefits provided by alternative 6.

Additionally, Appendix C (Section 3.3.1.1) recognizes that hydropower regulation reduces annual peak flows, but the DSEIS does not evaluate the geomorphic or ecological benefits of restoring variability in peak flows under Alternative 6. This analysis is necessary for a complete environmental review as required by the National Environmental Protection Act (NEPA).

2.2 Total Dissolved Gas and Penstock-Related Mortality

The DSEIS notes potential challenges related to total dissolved gas (TDG) and fish mortality following removal of turbines but does not evaluate available mitigation measures. Studies conducted by The Bureau of Reclamation[2] and the Oregon Department of Fish and Wildlife[3] on cone valve performance at the Arthur R. Bowman Dam and Prineville Reservoir on the Crooked River should inform TDG mitigation measures for WVS facilities. Furthermore, Appendix A, Section 2.6.2 acknowledges that in-line orifices may produce TDG levels comparable to turbines and that fish screens would likely be required to reduce mortality. Appendix A, Section 2.6.2 also recognizes that screens would likely be required to exclude fish from the penstocks which would reduce mortality and that the reduced maintenance of the cone valves and in-line orifices (compared to turbines) could offset the increased maintenance required for screens. These factors should be reflected in the evaluation metrics and scoring for Alternative 6.

2.3 Economic Analysis

The economic presentation for Alternative 6 requires clarification. Section 3.12.3.2 identifies a –$569 million net loss associated with continuing to operate sub-market hydropower over the 30-year period. However, Table 3-35 presents results in a manner that implies hydropower production offers a net economic benefit. Furthermore, the description of hydropower as a “non-emitting source of energy” is inconsistent with research documenting methane emissions from

[2] https://www.usbr.gov/tsc/techreferences/hydraulics_lab/pubs/HL/HL-2009-01.pdf
[3] https://www.dfw.state.or.us/fish/passage/docs/wavers/Bowman_Dam/BOR%202018.pdf

hydropower reservoirs[4]. The economic analysis should be revised to accurately reflect these considerations using the best available science as required by NEPA.

2.4 Structural Versus Operational Measures for Downstream Passage

We recommend that the Corps replace structural downstream passage measures (Measure 392) with operational measures (Measures 40 and 720) within Alternative 6. Floating surface collection systems have not demonstrated consistent performance across reservoirs with large water-level fluctuations and have not achieved the 95% collection efficiency required by NOAA Fisheries. In contrast, deep drawdowns at Fall Creek have resulted in significantly higher reservoir survival rates of outmigrating salmonids. Section 4.5.7 of the 2024 Biological Opinion identified low passage rates from the head of the reservoir to the dams during spring spill operations at Green Peter dam and higher passage rates for the fall drawdowns at Green Peter and Foster dams. Section 4.2.3.1 determined reservoir survival rates ranging from 18% to 23% in the Lookout Point reservoir. Comparatively, the riverine conditions during deep drawdowns at Fall Creek reservoir have resulted in reservoir survival rates between 74% and 98%.

Operational strategies combined with hydropower decommissioning would also reduce costs, enhance dam safety, and improve overall water quality. Section 5.1.1 of Appendix N (Implementation and Adaptive Management Plan) recognizes that the deep drawdown measures could potentially meet the long-term criteria for fish passage, flow, and water quality. Furthermore, the risks and uncertainties for the proposed floating surface structures include "risk of entrance attraction and rejection, passage rates, survival rates, [and] effectiveness given the scale of reservoir fluctuations" (Appendix N, Section 5.1.1). The risk and uncertainties for the deep drawdowns concern water management during dry years. Removing the requirement to maintain a power pool will increase the operational flexibility during dry years and would not conflict with the primary authorized purpose of flood risk management.

Please see later comments on measure 392 (Section 8, Measure 392: Structural Downstream Fish Passage) for further concerns about the proposed structural downstream passage measures.

3 Dam Safety

We commend the Corps for its focus on dam safety, recognizing that each WVS dam carries a high-hazard classification with the possible loss of life downstream if they fail (Appendix A, Section 1.1.4, Alternative 6 Development Process). Operational measures that reduce stored water directly reduce downstream consequences and should be prioritized over structural measures

[4] https://hydroreform.org/reservoir-emissions/

that increase inspection and monitoring requirements (Appendix H, Section 2.1). Deep drawdowns in particular merit discussion for their potential dam-safety benefits.

The assumption that seismic events are unlikely during summer conservation pools should be reconsidered, as seismic hazards are not seasonal. We also support the acknowledgment in Appendix H (Section 3) that dam removal may be an appropriate long-term dam safety risk-reduction measure.

4 Tribal Sovereignty and Decision-Making Authority

Tribal nations should be co-equal with the U.S. Government in decision-making (Appendix N, Section 4.3), as their reserved treaty rights include co-management of fisheries. Tribal representatives should not be limited to participation within the WATER group for advisory purposes alone (Appendix N, Section 4.2).

In addition, the FSEIS should note that Section 204(b) of the Unfunded Mandates Reform Act exempts Tribal–Federal consultations from Federal Advisory Committee Act (FACA) requirements, provided participation is limited to Tribal officials and federal representatives. This exemption allows for open exchange without FACA's strict requirements only if participation is limited to official tribal representatives and U.S. Government participation. Tribal representatives may participate in the WATER group to inform science-based management decisions while retaining the rights for decision-making co-equal with the U.S. Government.

5 River Mechanics and Geomorphology

While the Executive Summary in Appendix C provides a clear overview of geomorphic conditions and trends influenced by WVS operations, these concepts are not carried through the full analysis. The assumption that geomorphic stability is inherently beneficial is inconsistent with natural river processes. The focus on “conveyance efficiency” is similarly misplaced for a geomorphic assessment. The 2024 Biological Opinion recognizes “degraded freshwater habitat, including floodplain connectivity and function, channel structure and complexity, incubation gravels, riparian areas, and gravel and large-wood recruitment” as limiting factors for listed species recovery.

The analysis should incorporate the following:

- evaluation of effective discharges rather than “near-bankfull flow” for sediment dynamics;
- recognition that reduced sediment trapping and enhanced sediment transport may be ecologically beneficial;
- discussion of potential channel and floodplain responses to revetment modification or removal; and
- incorporation of relevant scientific literature, including the Wallick et al. studies referenced in the Executive Summary.

6 Revision of the Evaluation Metrics (Appendix A, Table 1-5)

We offer the following recommendations:

- **Objective 1:** Incorporate allowable operational ranges and drawdown timing to reflect water-management flexibility.
- **Objective 3**: Include metrics addressing net revenue generation or minimized losses.
- **Objectives 4 - 6**:
  - Temperature effects should be an explicit metric.
  - Upstream and downstream passage rates should be directly measured, not solely used as model inputs.
  - Downstream habitat impacts related to water levels and sediment supply should be included.
- **Objective 7**: Address ecological changes associated with transitions from reservoir to riverine conditions and how this affects competition and predation.
- **Cost:** Reflect differences in operations and maintenance between cone valves/in-line orifices and turbines, as well as additional dam safety inspection requirements for structural measures.
- **Economic Effects**: Include angling, riverine recreation, and other recreation activities which do not require boat ramps[5].

7 Specific Comments on Measures Included in the Alternative Analysis (Appendix A)

- **Measure 9 (Revetments)**: Support revetment removal or modification where ecological benefits are substantial, particularly for floodplain reconnection and rearing habitat. We appreciate the summary of past studies and strongly recommend the Corps include a timeline for implementing these projects. To reduce flood risk, the focus should be on reducing flood ***consequences*** rather than focusing solely on flood ***probabilities***. Emphasis should be placed on more frequently occurring, lower-magnitude floods to provide ecosystem benefits. Appendix C discusses how extensive revetments combined with hydropower operations have limited floodplain connectivity. The FSEIS should also evaluate how Alternative 6 would influence floodplain dynamics under non-hydropower operations.
- **Measure 639 (Removal of Drop Structures on the Long Tom River):** Strongly support removal for improved public safety, fish passage, and water quality benefits. We encourage the Corps to continue the removal of the Monroe dam and proceed with work upstream.
- **Measures 40 & 720 (Deep Drawdowns):** We appreciate the per-dam discussion and recommend inclusion of these measures in Alternative 6 in place of structural passage systems (measure 392).

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[5] Economic Value of Visitation to Free-Flowing and Impounded Portions of the Ocklawha River in Florida: Implications for Management of River Flow

- **Measure 52 (Lamprey Passage):** We strongly support inclusion of lamprey passage measures at all WVS dams, including Green Peter, Blue River, and Hills Creek.
- **Measure 174 (Total Dissolved Gas Abatement**): Include designs identified in the Bowman Design studies to reduce total dissolved gas from cone valves. The statement that "little is known regarding the design and construction of riffles and debris jams" is inaccurate; these are common features in channel enhancement projects. See the Bowman Dam studies referenced earlier, the National Large Wood Manual[6] (USACE, 2016), and the Stream Habitat Restoration Guidelines[7] (WDFW, 2012) for some design and construction recommendations for these features.

8 Measure 392: Structural Downstream Fish Passage

Recommend screening out this measure based on technical uncertainty and failure risk. Floating surface structures have not achieved required efficiency levels across comparable reservoirs and present significant operational uncertainty. Operational measures, especially when combined with hydropower decommissioning, offer a more reliable and cost-effective approach.

This measure should be screened out because “Feasibility, design, cost and specific biological benefit of the structure will be determined during a future consideration design phase” (Appendix A, Section 2.4.4). Technical Screening Criteria (Appendix A, Table 1-2) require screening out measures where available information is not sufficient or demonstrates major risk of failure.

The available information on floating surface structures is not sufficient to support implementation of the measure and demonstrates major risk of failure:

- The Anadromous Salmonid Passage Facility Design Manual[8] (NMFS, 2022) requires 95% collection efficiency.
- To date, *no* floating surface collector (FSC) has consistently achieved 95% Fish Collection Efficiency (FCE) across all target species or been successful across the wide ranges of reservoir water levels in the Willamette Valley System:
    - **Cougar Dam (OR):** Failed pilot collector (<1% FCE) was removed[9].
    - **Swift No. 1 (WA):** 100 ft fluctuation; initial FCE 20–35%[10].

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[6] https://ewn.erdc.dren.mil/wp-content/uploads/2021/03/National_Large_Wood_Manual-USBR_USACE-January2016-FINAL2.pdf

[7] https://wdfw.wa.gov/publications/01374

[8] https://www.fisheries.noaa.gov/resource/document/anadromous-salmonid-passage-facility-design-manual

[9] Beeman, J.W., et al. (2016). Evaluation of the Biological and Hydraulic Performance of the Portable Floating Fish Collector at Cougar Reservoir and Dam. USGS Open-File Report 2016-1003.

[10] USGS. (2018). Development of New Information to Inform Fish Passage Decisions at the Yale and Merwin Hydro Projects.

- **North Fork Dam (OR):** High success (>90%), but only has a 27 ft fluctuation, unlike Willamette Vally System dams[11].
- **Cushman No. 1 (WA):** Struggling to meet FCE goals (30-40% initial)[12].

If a collector has a 30% efficiency, the other 70% of fish remain in the reservoir. Uncollected fish become residuals and may suffer predation and increased disease risk in the reservoir. Section 5.2.3.5 of Appendix N acknowledges that the risks and uncertainties of the proposed floating structures include "risks about entrance attraction and rejection, passage rates, survival rates, [and] effectiveness given the scale of reservoir fluctuations." These risks and uncertainties should result in this measure being screened out by the technical screening criteria.

We recommend using operational measures combined with the flexibility provided by eliminating the power pool instead of downstream passage structural measures. Removing the structural measures from Alternative 6 would reduce total cost for the alternative (including dam safety inspections and monitoring beyond standard operations & maintenance costs), improve dam safety, and benefit water quality.

Conclusion

Thank you for the opportunity to comment on the Willamette Valley System DSEIS. We respectfully request that the Corps address the issues outlined above in the Final SEIS. Please contact me at mklym@americanrivers.org for further information or clarification.

Sincerely,

MC Klym

Melanie Klym, Northwest River Restoration Director, American Rivers

[11] Smith, C.D., et al. (2018). Fish Behavior and Abundance Monitoring Near a Floating Surface Collector in North Fork Reservoir. U.S. Geological Survey (USGS) Open-File Report 2018-1182.
[12] National Hydropower Association (NHA). (2016). Tacoma Power Cushman Floating Fish Collector Project Overview.

From:	Judith Marshall
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Jody Marshall
Subject:	[Non-DoD Source] Re: USACE, Portland District extends public comment period on the WVS Draft Supplemental EIS
Date:	Wednesday, January 14, 2026 10:26:31 AM
Attachments:	WVS SEIS 01-26 comments.pdf WVS SEIS 01-26 comments.pages

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Please find enclosed the same comments I sent yesterday but in a pdf file. Just realized the document I sent in a pages file may not be compatible with your system's use.

Thank you,

Jody

> On Jan 13, 2026, at 6:01 PM, Judith Marshall <jody8111@comcast.net> wrote:
>
> Please find enclosed my comments to the draft SEIS for the Willamette Valley System.
>
> Thank you,
> Jody
>
> > On Dec 11, 2025, at 11:53 AM, CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil> wrote:
> >
> > The U.S. Army Corps of Engineers, Portland District is extending the public comment period to **January 13, 2026** for the Willamette Valley System Operation and Maintenance Draft Supplemental Environmental Impact Statement.
> >
> > Comments on the draft SEIS must be submitted in written form and can be submitted via this email or to the USACE address below.
> >
> > USACE will hold an additional public meeting in Stayton on Tuesday December 16 at 6pm at the Stayton Community Center, 400 W Virginia St. Stayton, OR 97383.
> >
> > https://www.nwp.usace.army.mil/Media/News-Releases/Article/4357477/public-comment-period-extended-additional-public-info-session-added-for-detroit/
> >
> > ------

U.S. Army Corps of Engineers, Portland District
P.O. Box 2946
Portland, OR 97208-2946

COMMENTS TO
WILLAMETTE VALLEY SYSTEM OPERATIONS AND MAINTENANCE
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT BY THE US ARMY CORPS OF ENGINEERS (NOVEMBER 2025)

Submitted Jody Marshall
January 09, 2025

GENERAL COMMENTS

Execution of the National Environmental Policy Act (NEPA) -My comments to the *Willamette Valley System Draft Programmatic Environmental Impact Statement* (WVS PEIS) (Corps, 2022)are the same as submitted on February 23, 2023.

Section 1.12.8 2024 Water Resource Development Act…, Please describe why Congress wants an alternative that ceases hydropower operations at the projects

Section 2.4 Purpose and Need
The purpose and need seems a bit dated. "The purpose and need for the continued operations and maintenance of the WVS is to operate the system in accordance with the eight Congressionally authorized purposes and in compliance with the ESA and all other applicable treaties, laws, and regulations…" I think it would be more relevant to discuss why or if these eight Congressionally authorized purposes are needed.
I am having trouble understanding the effects of Power Generation and Transmission later in Section 3.12. Is there a need for hydropower generation & transmission on the WVS, and how would this be affected with implementing Alternative 6?

Section 2.8.6 Interim Measures
This SEIS states, "The Detroit drawdown operation was developed based on lessons learned from previous drawdowns at Green Petroleum and Lookout Point reservoirs…" Please state what these lessons are.

2.10 Alternatives Considered in Detail and the Preferred Alternative
"This section is incorporated by reference with the following clarification related to Alternative 6:
Alternative 6 does not meet the purpose and need for this statement because it formally analyzes eliminating hydropower, eliminating the hydropower authorization at the projects (Section 2.4)."
The purpose and need does not give the *why* of each of the authorized uses and why Congress wants an evaluation of the WVS operating without hydropower.

3.5.3.1 Methodology for Total Dissolved Gas Modeling

It is not clear to me why Alternative 6 result in significant increases to TDG levels although, "Alternative 6 does not include specific measures to reduce TDG." Why are there no specific measures to reduce TDG?

3.5.3.2 Alternatives Analyses - Alternative 6
Table 3-10 shows that the WVS cannot operate without exceeding the water quality limits for TDG for all the alternatives.

OVERALL -

Review - The review of the SEIS is a real burden to the public who wants to understand the deep drawdown at Detroit and Alternative 6 - ceasing hydropower generation. It required so much back-referencing that it was very cumbersome and really requires a desktop computer with several screens.

Turbidity Downstream of Detroit with Deep Drawdown. What I could not find however, is the downstream turbidity effects of the deep drawdown at Detroit and the Corps' status of obtaining approval from the Oregon Department of Environmental Quality (ODEQ) under the Clean Water Act. I understand that ODEQ plans to "…penalize the Corps for violating environmental law."[1] Does the Corps anticipate approval from ODEQ for TDG, temperature and turbidity exceedances by the proposed action.

I also could not find in text or appendices the status of compliance under the Clean Water Act per Corps Regulatory Guidance Letter, No. 05-4, August 19, 2005. The SUBJECT of this guidance letter is: *Guidance on the Discharge of Sediments From or Through a Dam and the Breaching of Dams for Purposes of Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899.*

Please be Aware of 40 CFR 1506.1 (c)

> (c) While work on a required programmatic environmental review is in progress and the action is not covered by an existing programmatic review, agencies shall not undertake in the interim any major Federal action covered by the program that 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 review; and (3) Will not prejudice the ultimate decision on the program. Interim action prejudices the ultimate decision on the

[1] Per the article from the Capital Press on February 29, 2024, "Muddying the Waters:…"

program when it tends to determine subsequent development or limit alternatives.

This is important because I am not sure what is the baseline, the NAA with the interim measures or just the NAA or how the placement of cobbles at Big Cliff Dam are baseline or about to happen. Why not include it all?

Cumulative Effects - After back referencing the PEIS from 2022, I can find no cumulative effects discussion of implementing Alternative 6. This is still needed.

CONCLUSION

I support de-authorization of hydropower in the Willamette Valley hydropower project (WVP). The economics don't support it, traditional operations of turbines in the eight of the thirteen dams on the Willamette result in water pollution; incidental oil spills; increased water temperatures downstream, and increased adverse effects to UWR spring Chinook and winter steelhead. The Corps culture does not value the natural and cultural environment or laws for their protection. This culture prevents the Corps doing from what is required of them or what they should do to help recover these imperiled species. This has included repeated violations of the ESA and NEPA in the WVP and in other important watersheds.

I think by de-authorizing hydropower on the WVS, the Corps would not be able to claim need to do actions that are causing extinction to these imperiled UWR spring Chinook and winter steelhead. The public has not been notified of the change in effects of Corp operations since 2000 with the ESA listing of the UWR salmon and steelhead and in 2008 with the NMFS' established requirements in their biological opinion to the Corps with conditions to avoid jeopardizing the continued existence of these two anadromous species as is required under ESA. Implementing the BiOp came and comes with a big cost. But the Corps did not follow the requirements of the biological opinion that were critical to avoiding jeopardizing the listed fish, and this has resulted in their decline. The Corps were found in violation of the ESA in District Court in 2021.

The Corps did not give the general public to comment on NMFS' effect determination to ESA-listed UWR Chinook salmon and winter steelhead with the Willamette Basin Review (WBR) as is required under NEPA. This was the most significant issue and resulted in another no-jeopardy opinion on top of the 2008 determination for the WVP, the Corps analyzed a new preferred alternative and gave only a selected portion of the general public the opportunity to review it. Only the stakeholders, not the whole general public, were given opportunity to comment on these new significant changes. This violates NEPA regulations at the time WBR was developed and denied robust public input on the decline of these historically and biologically significant species.

This lack of transparency and protection of federally-recognized significant resources reduces my trust in the Corps to do the right thing under these laws

and seeking public input. Therefore, I support de-authorizing hydropower and stopping the Corps from using exorbitant amounts of taxpayers' money to build another engineering solution that creates more environmental problems. I think the species that are listed as protected under ESA would receive greater protection as they deserve.

From:	Lindsey Hutchison
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Grace Brahler
Subject:	[Non-DoD Source] Comment Letter on the WVS Draft Supplemental Environmental Impact Statement
Date:	Tuesday, January 13, 2026 6:44:34 PM
Attachments:	WRK and CW WVS DSEIS Comment Letter.pdf

Hello,

Please see the attached comment letter submitted by Willamette Riverkeeper and Cascadia Wildlands on the Willamette Valley System Draft Supplemental Environmental Impact Statement. Please confirm receipt of this email and attachment.

Thank you,

Lindsey Hutchison, Staff Attorney
Willamette Riverkeeper
Email: lindsey@willametteriverkeeper.org
(she/her/hers)

CASCADIA WILDLANDS
We like it wild.

Willamette RIVERKEEPER®

January 13, 2026

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: Willamette Valley System Draft Supplemental Environmental Impact Statement

To Whom It May Concern:

Please consider the following comments from Willamette Riverkeeper and Cascadia Wildlands concerning the U.S. Army Corps of Engineers' (Corps) Draft Supplemental Environmental Impact Statement (SEIS) for the Willamette Valley System (WVS).

More than one million Chinook salmon and steelhead once returned to the Willamette River Basin, and there once was a robust population of bull trout. Over the last hundred years, with the 1938 authorization of the Willamette Valley System,[1] the effects of flood control and hydropower operations and resulting loss of habitat have driven steep declines in these fish populations in the Willamette Basin.[2] These collective pressures contributed to the listing of bull trout under the Endangered Species Act in 1998, and the listing of Upper Willamette River spring Chinook salmon and steelhead under the Endangered Species Act in 1999, as explained in our February 2023 comment letter on the WVS Draft Programmatic Environmental Impact Statement.[3]

In 1980, the Corps created the first programmatic EIS for the Willamette Valley System. Soon after, Upper Willamette River Chinook Salmon, Upper Willamette River steelhead, and bull trout were listed as federally threatened species under the Endangered Species Act. In the twenty-seven years since these species were listed, the Corps has neglected to prioritize the survival of these threatened species, and the continued operation of the Willamette Valley System has put them at greater risk of extinction each year. According to NMFS's 2024 Status Report on Upper Willamette River Chinook salmon and steelhead, "[c]limate change modeling

[1] The primary purpose of the Willamette Valley Project dams is flood control. According to the USACE Portland District website, "Portland District's highest priority is ensuring the Corps' dams are fully able to reduce flood damage to downstream communities on the Willamette and Rogue rivers, and that the Columbia River dams continue to safely function as designed."
[2] *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.
[3] Commenters incorporate by reference the comment letter Willamette Riverkeeper, Cascadia Wildlands, Center for Biological Diversity, and Oregon Wild submitted to the U.S. Army Corps of Engineers on February 23, 2023, on the Willamette Valley System Draft Programmatic Environmental Impact Statement.

predicts that in the absence of passage to colder headwater areas, some populations would be at a high risk of extinction by 2040."[4]

Willamette Riverkeeper and Cascadia Wildlands (Commenters) have concerns about the Corps' draft SEIS and the Corps continued preference for Alternative 5. Alternative 6 does not reflect a genuine effort by the Corps to truly consider decommissioning hydropower at the Willamette Valley Project (WVP) dams, and the instance of continuing with Alternative 5 does not meet the Corps' statutory obligations under the Endangered Species Act to ensure that the Willamette Valley System does not jeopardize listed species. Commenters strongly urge the Corps to conduct a more thorough analysis of decommissioning hydropower at the dams and to truly consider this as a viable option that will make the Willamette River more resilient in the face of climate change.

DISCUSSION

Alternative 6 does not reflect a genuine effort by the Corps to evaluate the end of hydropower at the Willamette Valley Project dams. Congress was clear in the Water Resources Development Act of 2022 and again in 2024, directing the Corps to "carry out 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, of the Willamette Valley hydropower project."[5] Yet the Draft Environmental Impact Statement failed to analyze what decommissioning hydropower would entail. That omission is exactly why this Supplemental Environmental Impact Statement is necessary.

It is clear, Alternative 6 is the Corps begrudgingly going through the motions to appease Congress, with no openness or intent to actually end hydropower as requested. The Corps purposefully wrote Alternative 6 to make Alternative 5 seem like the only reasonable option but failed to consider the many benefits that can come from decommissioning hydropower at the dams. Unlike other policy areas, there is a unique consensus on decommissioning hydropower at the dams: the State of Oregon, the Bonneville Power Administration, utilities, environmental nonprofits, and tribal nations all agree that this is the best solution to meet the Corps' ESA obligations. A spokesperson for the Eugene Water and Electric Board explained, "[w]e already know that the Willamette Basin projects are the least efficient hydropower resources in Bonneville Power Administration's portfolio… Changing how they operate will have benefits for fish and wildlife, while saving money for publicly owned utilities."[6]

Despite this, the Corps continues to insist that hydropower generation is needed at the dams and refuses to genuinely consider decommissioning hydropower at the Willamette Valley Project.

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[4] 2024 5-Year Review: Summary & Evaluation of Upper Willamette River Steelhead and Upper Willamette River Chinook Salmon, NMFS West Coast Region (2024), at pg 20.
[5] (WRDA 2022, Section 8220).
[6] *Army Corps misses key deadline to report to Congress on ending Willamette hydropower to save salmon*, Oregon Capital Chronicle (July 12, 2024), https://oregoncapitalchronicle.com/2024/07/12/army-corps-misses-key-deadline-to-report-to-congress-on-ending-willamette-hydropower-to-save-salmon/#:~:text=Instead%20of%20ending%20hydropower%20and,money%20for%20publicly%20owned%20utilities.%E2%80%9D.

The Corps needs to go back to the drawing board and write additional, more robust, alternatives that include decommissioning hydropower at the dams.

I. The SEIS does not reflect a good faith effort by the Corps to consider decommissioning hydropower at the dams.

Alternative 6 failed to consider all the benefits that could come from decommissioning hydropower at the dams and instead looked only at potential negatives, making them seem larger than they are. For example, the SEIS states, "Alternative 6 is expected to have adverse effects on hydropower generation and increase construction costs." The Corps did not consider the construction costs associated with maintaining the hydropower infrastructure or the cost of power generated by these dams, which operate at a loss annually.

The SEIS also fails to meaningfully evaluate cumulative, basin-wide ecological impacts of operating the Willamette Valley Project as an integrated system rather than as a collection of individual facilities. Water temperature, sediment transport, and floodplain connectivity are affected by the combined operation of all dams, yet the SEIS does not assess whether incremental improvements at one site are negated by continued barriers, altered flows, and thermal loading elsewhere in the basin. Without a system-level ecological analysis, the Corps cannot determine whether its preferred alternative will actually avoid jeopardy to listed species or meaningfully improve long-term watershed resilience.

The Corps spends an unknown amount every year to keep the hydropower infrastructure running. As seen in documents received by Willamette Riverkeeper in response to a 2021 FOIA request, the Corps regularly needs to repair turbines and other hydropower infrastructure as these dams age. These costs are not small. Considering only one dam decommissioning alternative is a failure by the Corps to consider all possible options to help fish, improve ecosystems, and maintain the WVP's main purpose: flood control.

Alternative 6 includes the complete removal of hydropower infrastructure and then goes on to replicate the Corps' preferred alternative, Alternative 5, which includes "proposed structural changes [that] are both massively expensive and speculative in their biological benefits for endangered species."[7] This utterly fails to meet the intent of Congress when it directed the Corps to study ending hydropower in the Willamette Valley System.

We need the Corps to conduct a dam-by-dam analysis that includes options such as leaving hydropower infrastructure in place without generating commercial hydropower. Each dam has different power output, retrofit costs, purposes, and species that may be impeded by these structures. There is no one-size-fits-all option; every dam is different. This analysis is needed to ensure that fish recovery happens as quickly and efficiently as possible. The Corps needs to go back and consider other dam decommissioning alternatives in order to make a good faith effort to follow Congress's directives.

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[7] U.S. Army Corps of Engineers November 13, 2023, listening session, https://wholecommunity.news/2023/11/21/bpa-ppc-residents-discuss-future-of-willamette-valley-hydropower/ (hereinafter "Listening Session").

II. The Willamette Valley Project hydropower is too costly to continue to operate.

Willamette Riverkeeper currently has a FOIA request pending with the Corps requesting economic analyses and other documents related to any actions and studies the Corps has conducted regarding decommissioning hydropower at the Willamette Valley Project. After much back and forth, this request was perfected on June 23, 2025. Six months later, and the Corps has not even come up with an estimated timeline for getting this information to WRK. The Corps' lack of transparency around this is concerning, and without this information, Commenters cannot be thorough in our analysis of the proposed alternative, but can confidently say, based on publicly available documents, that continuing hydropower at these dams will create a net loss financially.

The total maximum generating capacity at the Willamette Valley Project is 495 megawatts, but "due to variations in water supply the annual energy output of these dams is lower, averaging 184.4 MW of hydropower for an average water year, or enough power for about 138,000 homes."[8] This is in direct conflict with the Corps' own claims that the WVP dams "generate hydroelectric power, enough for approximately 300,000 homes."[9] The eight WVP dams that generate hydroelectricity contribute "less than 4% to the average power generation for the entire Federal Columbia River Power System."[10] With the proposed drawdowns and other fish passage measures, the Willamette Valley Project will likely generate even less power over the coming years.

The WVP dams produce power at a huge cost, with BPA estimating the cost to be $30,83 per MWh over the next 30 years "before any additional fish mitigation measures are constructed or implemented."[11] BPA noted that "[a]ny additional fish mitigation measures would drive the cost to generate power from the Willamette dams even higher."[12] The cost of this hydropower means that there is less capital for BPA to spend on grid hardening, wildfire resilience, and transmission upgrades for renewables. The Corps has no way of lowering these costs, and instead, the costs continue to increase. BPA states that to remain cost competitive, the levelized cost of generation must remain "at or near $11 per MWh." At a public hearing, the Public Power Council (PPC) explained that it "has long expressed concerns about the economic vitality or viability of power generation at the Willamette Valley hydro projects…"[13] The PPC went on to state "[t]he cost outlook of the projects, already among the most expensive on the federal system, is further threatened by the proposed structural measures in the proposed alternative of the [EIS]." The degradation of power production from both interim operations and the operations in the preferred alternative needs to be included in any economic analysis that the Corps creates when considering decommissioning hydropower at the dams.

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[8] *Fact Sheet: Power from the Willamette Basin dams,* Bonneville Power Administration (2019), https://www.bpa.gov/-/media/Aep/about/publications/fact-sheets/fs-201908-Power-from-the-Willamette-Basin-dams.pdf (hereinafter "*BPA Fact Sheet*").
[9] *About the Willamette Valley*, U.S. Army Corps of Engineers Portland District, https://www.nwp.usace.army.mil/Locations/Willamette-Valley/.
[10] *BPA Fact Sheet.*
[11] *Id.*
[12] *Id.*
[13] Listening Session.

In addition to the already extremely high cost of this hydroelectricity is the concern that drought will make hydropower even more unpredictable and costly. Between 2003 and 2020, the hydroelectricity sector in Oregon is estimated to have lost more than $1.5 billion in revenue due to drought.[14] Oregon generated 20% less hydropower in 2023 than in 2021 due to low precipitation during the fall and winter and the summer "heat dome."[15] WVP hydropower is not climate resilient and will remain unpredictable as the climate continues to change.

If the Corps did a thorough analysis of the costs tied to generating hydropower at the WVP dams, it would come to the same conclusion most others have: the WVP power is too expensive to continue using, and with no way of lowering the costs, the price is just too high to pay.

III. Commenters support the annual deep drawdown at Detroit Reservoir.

While Commenters have major concerns related to the Corps' the lack of robust analysis related to Alternative 6, we do support the Corps conducting a deeper drawdown at Detroit Dam and Reservoir to aid fish passage.

For salmon and steelhead, drawdowns allow juvenile fish to migrate successfully through the dams by temporarily lowering the water level closer to the passage routes far down on the dams. Without these drawdowns, very few juvenile salmon survive the trip through the power turbines on their journey to the ocean. Drawdowns have been effective over the past decade at Fall Creek, where there is a 98-99% survival rate for out-migrating juvenile Chinook salmon and an approximately ten-fold increase in returning adult salmon.

Drawing down Detroit Reservoir each fall to improve downstream fish passage for juvenile fish is one of the most effective operational tools available to help Upper Willamette River spring Chinook salmon and winter steelhead survive their migration to the ocean. The Corps' plan to phase the drawdown over three years to reduce the impact on downstream water quality is scientifically sound and well thought out. While Commenters acknowledge that drawdown turbidity and temperature issues require mitigation planning, deep drawdowns are cost effective, maintain flood control, and allow our rivers to return to a more natural flow.

IV. Decommissioning hydropower at the WVP dams and considering less costly fish passage measures would reduce the length of time interim measures are needed.

The Corps' preferred alternative will take many years, if not decades, to implement and during that time, interim measures will be in place. These interim measures do not do enough to protect the fish, and relying on these measures for years is unacceptable. WRDA 2024 states that the Corps "may not complete its review of, and consultation with other Federal agencies on, the operation and maintenance of the projects for flood control, navigation, and other purposes….until the [Corps] prepares and formally analyzes an alternative that ceases

[14] Alex Baumhardt, *Drought has cost the hydropower industry billions in losses in two decades, analysis finds*, Oregon Public Broadcasting (Aug. 16, 2024), https://www.opb.org/article/2024/08/16/hydropower-oregon-washington-drought/.
[15] *Id.*

hydropower operations at the projects…"[16] This directive paused whatever steps were being taken to plan for two juvenile fish passage structures at Detroit and Green Peter, likely pushing the long timeline for construction even further out.

The two structures will require extensive planning, time, and money, and even when built, may not work. Relying on large structural projects is both risky and speculative, considering permitting, contractor availability, seismic design complexity, and cost overruns. If the Corps took Congress's directives seriously, it would understand that decommissioning hydropower at the dams would allow for deep drawdowns that would create more natural flow and would save time and money as well as require far less planning, as drawdowns are already taking place at some of the dams. Interim measures are supposed to be short-term and should have a set timeline. These measures do not, and the Corps needs to choose an alternative that limits the amount of time interim measures are needed and needs to choose an alternative that is cost-effective and has a higher certainty of being successful in protecting the fish. Alternative 5 should not be that choice.

V. The Willamette Valley Project can still meet its authorized purposes and tribal obligations if hydropower is decommissioned and additional drawdowns are used for fish passage.

The Corps pushes back on drawdowns because they say that doing so would lower the reservoirs in a way where it would no longer meet its authorized purpose of recreation. It has gone so far that it has stated "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."[17] While Commenters think the Corps should consider removing some of the dams, we understand that is a bigger leap than the Corps is willing to take at this time.

However, the Corps must recognize that recreation is not synonymous with reservoirs. Flowing rivers support a broader and more resilient spectrum of recreational opportunities, and restoring fisheries would significantly expand angling, wildlife viewing, and river-based tourism, while also reducing public exposure to harmful algal blooms, low-oxygen conditions, and other water-quality hazards that disproportionately affect Tribal members, subsistence anglers, and rural communities who rely most directly on these waters for food, livelihood, and cultural practices. Economic studies, particularly those focused on dam removal and river restoration, suggest restored free-flowing rivers often generate significantly higher recreation values than the lost reservoir recreation, with Oregon research highlighting major economic contributions of outdoor recreation overall, indicating strong potential for river-based activities. While specific Oregon studies directly comparing river vs. reservoir recreation values over time are complex, models show gains in river recreation benefits (e.g., fishing, rafting) can surpass lost reservoir benefits, especially as climate change impacts reservoirs, bolstering the case for river-based recreation.[18]

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[16] H.R8812 § 334.
[17] *Willamette River Basin Feasability Study*, U.S. Army Corps of Engineers, https://www.nwp.usace.army.mil/willamette/basin-review/.
[18] John Loomis, *Quantifying recreation use values from removing dams and restoring free-flowing rivers: A contingent behavior travel cost demand model for the Lower Snake River*, Water Resources Research, Vol. 38, No. 6,1066 (2002).

Drawdowns are not always in effect—meaning these communities would continue to have reservoirs during certain seasons, and at other times, would experience a more free-flowing, natural river. Both conditions support recreation, and both continue to contribute to local economies. The Corps should be evaluating alternatives that reimagine what recreation looks like in a changing system, rather than dismissing options outright. Recreation is not lost under these alternatives—it evolves, and in many cases, becomes healthier, more sustainable, and more aligned with the region's ecological and economic future. Economic opportunities that come from decommissioning hydropower include reducing ratepayer burdens, freeing BPA capital for grid resilience, and aligning with regional clean energy planning.

Additionally, the Corps must evaluate how altered flow regimes and improved salmon passage intersect with Tribal treaty-protected fishing rights, which include access to healthy, harvestable fish populations and the ecological conditions required to sustain them. Ignoring alternatives that meaningfully improve fisheries risks perpetuating long-standing violations of federal trust responsibilities. Article 6 of the U.S. Constitution states that "all treaties made, or which shall be made, under the authority of the United States, shall be the supreme law of the land…" Many of the tribes in Oregon have fishing treaty rights as established by 19th-century treaties and court cases like *U.S. v. Oregon* which guaranteed indigenous tribes the right to fish at their usual and accustomed places on the Columbia River and its tributaries, the Willamette River being one of them, and their fair share of the fish.[19] In this case, the court held that the state may only regulate when reasonable and necessary for conservation. The WVP dams, as they are currently operated, harm fisheries and put salmon and steelhead at great risk of extinction.

Allowing the dams to be operated this way is in direct violation of the federal government's tribal treaty obligations. As the supreme law of the land, these obligations should be prioritized over any authorized purposes that may harm these obligations. Decommissioning hydropower gives the Corps the flexibility needed to improve fish passage at the dams while still allowing other authorized purposes to continue. These decisions carry implications for Tribal Nations, rural communities, and populations who depend on subsistence fishing, who disproportionately bear the ecological and economic burdens of degraded river systems. Incorporating treaty rights is not optional—it is central to determining whether the project fulfills its legal and moral obligations.

CONCLUSION

The Corps must develop a new SEIS, develop multiple good-faith hydropower cessation alternatives, conduct dam-specific economic and biological analyses, and work with the National Marine Fisheries Service and U.S. Fish & Wildlife Service to redevelop alternatives, providing a clear and legally sufficient path forward.

For more than two decades after the listing of Upper Willamette River spring Chinook salmon, steelhead, and bull trout, the Corps has continued to operate the Willamette Valley Project in a manner that places these species at ongoing risk of extinction. The Draft SEIS fails to demonstrate that the Corps has satisfied its affirmative duty under the Endangered Species Act to

[19] *See United States v. Oregon*, 302 F. Supp. 899 (1969).

ensure its actions are not likely to jeopardize the continued existence of listed species or destroy or adversely modify critical habitat. By advancing a preferred alternative that delays effective fish passage for years or decades, relies on interim measures with low certainty of success, and minimizes meaningful consideration of ending hydropower operations, the Corps perpetuates the very conditions that drove these species to listing in the first place.

The Draft SEIS also fails to meaningfully consider alternatives that would reduce biological harm while maintaining the Project's primary authorized purpose of flood risk management. Decommissioning hydropower—whether systemwide or on a dam-by-dam basis—would allow for deeper and more flexible drawdowns, restore more natural flow regimes, reduce operational costs, and accelerate recovery timelines for imperiled fish. These benefits are particularly critical in the face of climate change, which is already reducing hydropower reliability while increasing thermal stress and migration barriers for cold-water species. Continuing to invest in increasingly expensive and uncertain structural fixes, rather than addressing the root cause of harm, is neither fiscally responsible nor biologically defensible.

The Corps' approach also raises serious environmental justice concerns. Tribal Nations with treaty-reserved fishing rights and deep cultural connections to salmon have borne disproportionate harm from the loss of these fish and continue to face barriers to meaningful recovery. Downstream communities, subsistence anglers, and rural economies dependent on healthy rivers and fisheries are similarly affected by prolonged delays and ineffective interim measures. A course of action that knowingly prolongs species decline while prioritizing one of the least efficient and most costly hydropower resources in the federal system fails to equitably balance public benefits and burdens.

We strongly urge the Corps to correct these deficiencies by developing a new SEIS and conducting a good-faith analysis of alternatives that fully evaluate ending hydropower operations at the Willamette Valley Project dams. This should include, at a minimum, evaluation of systemwide hydropower cessation as well as dam-specific alternatives tailored to the unique operational, structural, and ecological conditions at each facility, rather than applying a uniform approach across the system, together with climate-adjusted hydrology modeling, clear biological performance metrics, and a cumulative impacts analysis across the full Willamette Valley Project.

The Corps must select an alternative that provides the greatest certainty of avoiding jeopardy, accelerates fish recovery, reduces long-term costs, and aligns Project operations with both Congressional direction and the realities of a changing climate. Anything less risks continued legal noncompliance, ongoing ecological harm, and the further erosion of trust with Tribal Nations, communities, and the public the Corps is obligated to serve.

Sincerely,

Michelle Emmons, Co-Executive Director and Upper Willamette Riverkeeper, Willamette Riverkeeper
Heather King, Co-Executive Director and Lower Willamette Riverkeeper, Willamette Riverkeeper
Grace Brahler, Wildlands Director, Cascadia Wildlands

From:	Judith Marshall
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Jody Marshall
Subject:	[Non-DoD Source] Re: USACE, Portland District extends public comment period on the WVS Draft Supplemental EIS
Date:	Tuesday, January 13, 2026 6:04:36 PM
Attachments:	WVS SEIS 01-26 comments.pages

Please find enclosed my comments to the draft SEIS for the Willamette Valley System.

Thank you,
Jody

> On Dec 11, 2025, at 11:53 AM, CENWP-PME-Williamette-Valley-System-EIS <willamette.eis@usace.army.mil> wrote:
>
> The U.S. Army Corps of Engineers, Portland District is extending the public comment period to **January 13, 2026** for the Willamette Valley System Operation and Maintenance Draft Supplemental Environmental Impact Statement.
>
> Comments on the draft SEIS must be submitted in written form and can be submitted via this email or to the USACE address below.
>
> USACE will hold an additional public meeting in Stayton on Tuesday December 16 at 6pm at the Stayton Community Center, 400 W Virginia St. Stayton, OR 97383.
>
> https://www.nwp.usace.army.mil/Media/News-Releases/Article/4357477/public-comment-period-extended-additional-public-info-session-added-for-detroit/
>
> ---
> U.S. Army Corps of Engineers, Portland District
> P.O. Box 2946
> Portland, OR 97208-2946

From:	Robyn Morley
To:	CENWP-PME-Williamette-Valley-System-EIS
Subject:	[Non-DoD Source] Draft SEIS Comment Letter - Morleys
Date:	Tuesday, January 13, 2026 5:45:05 PM
Attachments:	Morley Comment Letter.docx

Please see the attached Comment Letter. Thank you.

Robyn Roark Morley
Modelia LLC| CM3 Investments LLC| Willamette River View Holdings LLC|
3545 Deerfield Drive South, Salem, Oregon 97302| 503.400.2363

January 12, 2026
To: U.S. Army Corps of Engineers, Portland District
Attn: Liz Oliver, Project Manager
Willamette Valley System Draft Supplemental EIS
333 SW 1st Avenue
Portland, OR 97204

Re: Comments on the *Willamette Valley System Operations and Maintenance – Draft Supplemental Environmental Impact Statement (November 2025)*

Dear Ms. Oliver:

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for continued operations and maintenance of the Willamette Valley System (WVS). As full-time residents of Salem, Oregon, and property owners in Detroit, Oregon, we have carefully reviewed the Draft SEIS and are deeply troubled by the significant negative impacts it may cause. The potential consequences described in the Statement are alarming and warrant serious consideration, as they will affect many individuals and communities in the region.

We write to express **strong opposition to the proposed alternatives, including the Preferred Alternative (Alternative 5)**, and in particular the inclusion of the **late fall/early winter deep drawdown of Detroit Reservoir to elevation 1395 feet**, which will have **serious adverse consequences for drinking water systems, recreation, the Kokanee fishery, and the broader Santiam Canyon economy**. The SEIS **fails to adequately characterize these** and does not demonstrate that the Preferred Alternative will meaningfully benefit ESA-listed fish populations.

Our concerns are outlined below.

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1. Detroit Drawdown Impacts Are Significantly Understated

The SEIS acknowledges that the Detroit deep drawdown will adversely affect water supply, drinking water operations, and recreation (Executive Summary §7.2.2). However, the analysis **minimizes the true severity** of these impacts:

1.1. Water supply and turbidity impacts

Detroit Reservoir provides and supports municipal and community water supply needs in the region. A deep drawdown invariably reduces available storage volume and may lower reservoir elevations at a time when water demand for downstream communities still remains. Downstream communities—including Salem, Stayton, Turner, Jefferson, and rural water districts—serve **over 200,000 Oregonians** who rely on the North Santiam River for drinking water. The SEIS does not provide credible analysis that these systems can withstand prolonged or repeated turbidity

spikes. The SEIS states that the drawdown will cause "moderate" increases in sediment and turbidity. This conclusion is **not supported by recent empirical evidence**:

- The 2023–2024 Green Peter drawdown—conducted for the same purpose and referenced repeatedly in the SEIS—caused catastrophic turbidity levels and an estimated **$37–40 million in damage to municipal drinking water systems downstream**, particularly for the City of Lebanon and others. Despite this new information, it is absent from the SEIS turbidity analysis and NMFS's 2024 Biological Opinion did not incorporate this data, triggering ESA reinitiation requirements (50 CFR ¬ß402.16(a)(2)).
- The SEIS claims Detroit impacts will be lower due to reservoir morphology, but provides **no quantitative sediment modeling**, **no turbidity projections**, **no treatment threshold analysis**, and **no emergency planning framework**.

This is insufficient under NEPA's requirement for "high-quality information and accurate scientific analysis" (40 CFR 1500.1(b)). The SEIS should provide turbidity predictions, sediment load modeling, drawdown-specific geotechnical analyses, and evaluations against Oregon Drinking Water Services turbidity treatment thresholds. We urge USACE to ensure the SEIS clearly assesses:

- The specific reduction in available storage volume resulting from each proposed drawdown scenario (feet of drawdown / acre-feet of loss) and the corresponding reduction in yield available for municipal water supply.
- The timing of drawdown relative to municipal refill needs, hydrologic variability (drought years or low inflow years), and how that could compromise municipal supply reliability.
- Whether municipal supply agreements or commitments are guaranteed or prioritized in the revised operational regime.
- The potential need for emergency water-supply interventions in downstream communities if reservoir elevation remains low through the season.

Without this assessment, proceeding with a deeper drawdown risks placing undue burden on local municipalities and water-users, contrary to the statutory authorized purpose of water supply.

Moreover, the Corps did not include an evaluation of suction dredging to mitigate the impacts of sediment on municipal water systems. As reservoir levels fall, increased turbidity can overwhelm drinking water treatment systems downstream, particularly those that were not designed for continuous high-sediment loads. The SEIS should analyze the feasibility and effectiveness of this concept to ensure that public health and drinking water reliability would be safeguarded.

1.2. Failure to assess public health risks

The SEIS acknowledges potential threats to drinking water reliability (Chapter 3.19) but does not:

- Analyze public health risks should treatment systems become overwhelmed
- Evaluate cyanotoxin mobilization from sediment
- Require contingency plans for emergency water supply

Given that Salem's 2018 algal toxin crisis required statewide emergency action, **failure to robustly analyze drinking water vulnerabilities is a significant deficiency**.

Without this analysis, NEPA's requirement to evaluate "public health and safety" impacts (40 CFR 1502.16) is not met.

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2. Severe Recreational and Economic Impacts Are Not Fully Disclosed

As stated by the SEIS in Chapter 3.14, Detroit Lake is one of the most heavily visited waterbodies in the Willamette Basin. Detroit Reservoir is used heavily for recreation—boating, fishing, camping and tourism—which contributes substantially to the regional economy and quality of life. This is especially important for the rural communities of the North Santiam Canyon, which have struggled to identify areas of economic growth following the decline of the timber industry and are still working to recover from the devastation of 2020's catastrophic wildfires.

A deep fall drawdown would expose larger shoreline areas, reduce boat ramp access, shorten the effective recreation season, diminish reservoir aesthetics, and could destroy the Kokanee fishery. The SEIS acknowledges low summer levels "may" occur in dry years—but this is an understatement:

- The drawdown releases **over 150,000 acre-feet of water late in the year**, reducing the probability of refill even in average winters.
- The SEIS provides **no hydrologic modeling** of refill likelihood following the deep drawdown sequence.
- The likelihood of **boat ramp inaccessibility**, **marina closures**, **cancellation of recreation seasons**, and **loss of regional tourism revenue** is understated.

Again, Detroit and Idanha—already devastated by the 2020 wildfires—depend on recreation for survival. The socioeconomic section of the SEIS relies on **regional economic models that mask severe local impacts**, failing to capture:

- Business closures
- Loss of tourism-dependent jobs
- Impacts on public services and tax revenue

Chapter 3.14 acknowledges potential recreation loss, but:

- The SEIS does **not model refill probability** following a 1395' drawdown, despite disclosing that dry years may prevent refill (Executive Summary §7.2.2).
- Socioeconomic modeling uses **MSA-level** data (Table 3-29), obscuring acute impacts to Detroit, Idanha, and the Santiam Canyon.
- NEPA requires the evaluation of **localized effects** where impacts are severe (40 CFR 1508.27(b)(3), intensity factor).

Failure to disaggregate economic impact results in an incomplete effects analysis.

The drawdown threatens to prolong and deepen already fragile post-fire community recovery. We recommend that the SEIS include:

- A comparative analysis of recreation access under the current operational regime vs. the deeper drawdown alternative: e.g., number of days shorter the season, number of boat ramps unavailable, shoreline reduction in usable recreation area.
- An estimate of lost economic revenue (in dollars) to recreation-dependent businesses (marinas, lodging, campgrounds, bait/tackle shops) for each drawdown scenario versus the no-drawdown baseline.
- Mitigation measures or compensatory strategies (e.g., improved ramp infrastructure, seasonal coordination, visitor information) to reduce recreation loss.
- A transparent stakeholder engagement plan involving local businesses, tourism agencies, and recreation users in shaping mitigation.

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3. Devastation of the Kokanee Fishery Is Not Adequately Analyzed

The local kokanee (land-locked sockeye) fishery is an important ecological, recreational and economic resource. Lower reservoir levels in the fall and winter will degrade kokanee spawning habitat, reduce refuge areas, increase temperature variability, concentrate predators, and alter food-web dynamics unfavorably. While the draft SEIS emphasizes ESA-listed salmon and steelhead, it gives little attention to kokanee and other fish species that provide an invaluable economic attraction for the North Santiam Canyon.

The SEIS acknowledges that the drawdown will increase entrainment, injury, and mortality of resident fish species—including stocked Kokanee and trout—stating that “significant reductions in abundance” are possible (Executive Summary §7.2.2), however:

- The SEIS minimizes the recreational and economic importance of the Kokanee fishery.
- No population modeling is provided.
- No mitigation measures are proposed.
- No stocking adjustments or survival targets are included.

This does not meet NEPA's requirement for evaluating ecological consequences at a sufficient level of detail (40 CFR 1502.2). The Green Peter drawdown wiped out its Kokanee fishery entirely. The SEIS offers no evidence that Detroit would fare differently.

We urge USACE to:

- Include in the SEIS a focused assessment of the kokanee population dynamics under deeper drawdown conditions (e.g., spawning redd exposure, altered shoreline habitat, cold-water refugia).
- Compare impacts not only to anadromous fish but to resident fisheries whose value is measured locally and regionally.
- Identify monitoring protocols and trigger-points (e.g., kokanee population decline beyond threshold) that would prompt adaptive management.
- Propose mitigation measures (e.g., artificial spawning habitat, refuge water releases, timing of refills) to protect the kokanee fishery alongside the anadromous species goals.

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4. The SEIS Does Not Demonstrate That the Preferred Alternative Will Benefit ESA-Listed Fish

The purpose of the Detroit drawdown is to improve volitional downstream passage for juvenile Chinook and steelhead. However, the SEIS:

- Provides **no Detroit-specific survival modeling**
- Does not analyze effects on egg-to-smolt survival basin-wide
- Acknowledges that downstream passage benefits are **limited**, **seasonal**, and involve **tradeoffs harmful to other life stages**

Additionally, NMFS's own Biological Opinion (2024) was completed **without incorporating the massive new information** from the Green Peter drawdown disaster, which has thus far show no measurable benefit to endangered fish populations.

- New information invalidates key assumptions of the RPA
- NMFS is obligated under ESA §7(d) to **reinitiate consultation** when new information reveals effects not previously considered
- The SEIS cannot rely on a flawed Biological Opinion to justify the Preferred Alternative

The SEIS fails to show that the Detroit drawdown meaningfully contributes to salmon recovery, especially given the absence of modeled survival improvements and the lack of long-term passage infrastructure.

We recommend that the Corps significantly expand sediment sampling downstream of existing drawdowns, which have mobilized large volumes of fine sediment. This information is critical because high suspended-sediment loads can smother redds, impair gill function in juvenile

salmonids, and reduce aquatic insect production. Without a more comprehensive understanding of how mobilized sediment affects downstream fish habitat and population health, decision-makers and the public cannot fully evaluate the ecological consequences of the proposed operations.

The USACE should not implement a deep drawdown at Detroit Reservoir until it can provide empirical data demonstrating that similar drawdowns—such as the recent operations at Green Peter and other Willamette Basin projects—have produced measurable, biologically meaningful benefits for endangered fish populations. At present, no evidence shows that these actions have definitively improved downstream survival, increased adult returns, or contributed to population recovery goals, while the documented harms to water quality, resident fish, and community water systems are substantial. Before proceeding with another high-risk drawdown, the Corps must present clear, site-specific data proving that these measures are effective and necessary for ESA-listed species recovery.

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5. The SEIS Fails to Analyze Reasonable Alternatives

The National Environmental Policy Act requires evaluation of alternatives that avoid or minimize environmental harm. The SEIS should have evaluated:

- **Less severe drawdowns**
- **Modified timing** that avoids conflict with drinking water demand cycles
- **Fish passage improvements that do not rely on deep drawdowns**
- **Revised Guide Curve (WCM) optimization**, which our organization strongly supports
- **Accelerated structural fish passage solutions** rather than repeated interim measures

Because these alternatives were not fully considered, the SEIS does not meet NEPA's requirements for a "rigorous and objective evaluation" of alternatives. Given the potential adverse consequences described above, the SEIS should thoroughly evaluate alternative operational regimes that balance fish-passage objectives with water-supply, recreation and resident-fish protections. Specifically:

- Consider less aggressive drawdown alternatives (e.g., reduced depth of drawdown, shorter duration, timing shifts) that yield fish-passage benefit while limiting downstream impacts.
- Incorporate a robust adaptive management framework with defined monitoring, performance metrics, stakeholder review periods and the ability to revert or modify drawdown operations if unacceptable impacts occur.
- Provide for contingency plans for drought years or when municipal supply levels or recreation season viability is already compromised.
- Clarify who bears risk and cost for recreation loss or water-supply shortfall (USACE, state/local agencies, municipalities, water-users).

6. Requests

Within the SEIS, the U.S. Army Corps of Engineers seems to acknowledge the shortcomings of the proposed drawdown by stating, "…the deep drawdown at Detroit Reservoir is expected to adversely affect water supply, water quality, drinking water (facility operation), and recreation. The effects of the drawdown on fish are mixed…"

Given the deficiencies of the SEIS and the risks of the actions it proposes, we urge the U.S. Army Corps of Engineers to s**uspend implementation of the Detroit deep drawdown, until the agency can:**

1. **Request that the Department of Commerce and NMFS rescind and reinitiate the 2024 Biological Opinion**, incorporating new information from Green Peter impacts.
2. **Prepare a new SEIS that**
    1. **Conducts full quantitative modeling** of sediment, turbidity, refill probability, fish survival, and socioeconomic impacts.
    2. **Evaluates less harmful operational alternatives**, including adjustments to the Guide Curve.
    3. **Integrates community-level economic analysis**, not just regional modeling.
3. **Ensure the availability of financial mitigation assistance** to compensate local economies and businesses that could be undermined by the drawdown before implementing such a drastic measure.
4. **Complete the study on turbidity** mandated by Congress in 2024 WRDA legislation, before moving forward with a drawdown.
5. **Engage directly with downstream drinking water providers** to evaluate infrastructure risks and protective measures and ensure water systems are prepared for increased turbidity levels.

Conclusion

In closing, while we support the fundamental goal of improving passage for ESA-listed anadromous fish species in the Willamette Basin, we believe the proposed deeper fall drawdown at Detroit Reservoir carries significant risks for municipal water supply reliability, recreation access, and kokanee fishery that together threaten to undermine public health and economic wellbeing of communities throughout the region. The SEIS should not only analyze these impacts thoroughly but also provide concrete mitigation, alternative operational options, ongoing monitoring and stakeholder protections before proceeding.

As outlined above, the SEIS does not sufficiently analyze or disclose the serious risks associated with the Detroit deep drawdown and does not demonstrate that the alternatives, including the Preferred Alternative, would provide measurable benefits to ESA-listed fish populations. The

consequences for municipal water systems, public health, recreation, fishery resources, and the already fragile Santiam Canyon communities are severe and unacceptable.

We respectfully request that USACE withdraw or modify the Preferred Alternative and undertake a more comprehensive, scientifically grounded evaluation of impacts and alternatives. We look forward to continuing engagement in this process and working collaboratively to ensure balanced outcomes.

Thank you for your consideration of these comments.

Sincerely,

Robyn & Patrick Morley

Concerned Residents of Salem & Detroit, Oregon

From:	Steve Elzinga
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Oliver, E A (Liz) CIV (USA); Lyon, Amanda A CIV USARMY CENWP (USA); Alvin M. Klausen
Subject:	[Non-DoD Source] Willamette Valley System Draft SEIS - Additional Marion County Comments
Date:	Tuesday, January 13, 2026 4:57:14 PM
Attachments:	image002.png 2026-01-13 WVS Draft SEIS Comment - Local Governments.pdf 2026-01-13 WVS Draft SEIS Comment - Fish.pdf

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Liz, Amanda, and Team,

Please see the attached additional Marion County comment letters on the Willamette Valley System Draft Supplemental Environmental Impact Statement. Copies will also be sent by mail.

Thank you for your review and consideration.

Thank you,

Steve Elzinga
County Counsel
Marion County
Office of Legal Counsel

Email: selzinga@co.marion.or.us
Phone: 503-588-5220

CONFIDENTIALITY NOTICE
This email may contain information that is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this email in error, please advise me immediately by reply email, keep the contents confidential and immediately delete the message and any attachments from your system.

County Commissioners
Colm Willis, Chair
Kevin Cameron
Danielle Bethell

Chief Administrative Officer
Jan Fritz

County Counsel
Steve Elzinga

MARION COUNTY LEGAL COUNSEL

January 13, 2026

Via Email: Willamette.EIS@usace.army.mil
Via Regular Mail:
U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946
Portland, OR 97208-2946

Re: Need to Revise Willamette Valley System Draft SEIS

To Whom It May Concern,

On behalf of Marion County, we submit these additional comments regarding the Willamette Valley System Draft SEIS. Careful review and fidelity to federal law is important for protecting all aspects of the environment, especially water quality for Marion County residents.

Under 42 U.S. Code § 4332(2)(C), all environmental impact statements must include "a detailed statement" on "reasonably foreseeable environmental effects of the proposed agency action" among other things. The draft SEIS is deficient for many reasons.

1. **Insufficient Prioritization of Water Quality and Human Environment**

The federal Environmental Protection Agency (EPA) recognizes that high turbidity is "often associated with higher levels of disease-causing microorganisms such as viruses, parasites and some bacteria. These organisms can cause symptoms such as nausea, cramps, diarrhea, and associated headaches."[1] The "action" alternatives fail to adequality address turbidity concerns for hundreds of thousands of Marion County residents.[2]

The SEIS does not adequately analyze nor prioritize the needs for water quality and protecting the human environment, as required by 42 USC § 4321. Multiple jurisdictions in Marion County use slow sand filtration, which is highly impacted by turbidity. Such slow sand filters would be damaged by the deep drawdown proposal, especially since the fine silt of a deep drawdown is more damaging to slow sand filters than the larger particles of storm-created turbidity. The total collective cost to local governments in Marion County is expected to be millions of dollars to repair, replace, or find alternative water sources, plus preparations will take more time than proposed in the SEIS. A deep drawdown anytime in 2026 or 2027 would be catastrophic. Yet, the

[1] https://www.epa.gov/ground-water-and-drinking-water/national-primary-drinking-water-regulations
[2] For this reason and all those raised by Marion County, the Army Corps risks violating APA prohibitions against decision-making that is arbitrary, capricious, an abuse of discretion, or inconsistent with the law. 5 U.S.C. § 706(2).

SEIS does not even mention impacts on slow sand filters, let alone analyze or weigh such impacts sufficiently.

For example, the City of Stayton has a slow sand filter that can be temporarily closed during storm events with high turbidity because it usually has around three days of water storage. However, extended deep drawdowns lasting longer than a few days could not be handled with reserve water and would force the city to either spend significant funds that it does not have or turn off municipal water. That is not acceptable. Further, the SEIS does not include any assurance of monitoring for turbidity at a location far enough upstream from municipal water uses that a drawdown could be paused for unacceptable turbidity (i.e. in pool monitoring). Failure of any of the North Santiam potable water systems can be and must be avoided – recovery of damaged water systems takes months, at extreme costs, and must be part of the SEIS impacts analysis.

The SEIS also fails to analyze potential impacts on nearby wells (both public and private) that could be affected by fine sediment in the same river whose water is also going into the aquifer from which the wells draw water.

Of the limited alternatives analyzed, only the "no action" alternative protects water quality needs. If the Army Corp believes that some action is needed, additional alternatives must be developed and considered with additional public input opportunity.

2. Insufficient Analysis of Unique Differences of North Santiam Sub-Basin

While the Army Corps can and must learn from the mistakes in other nearby sub-basins like the issues caused by the recent Green Peter Lake deep drawdown, it is problematic to overly rely on information and analysis from other sub-basins without accounting for differences. The North Santiam is a very different sub-basin than all others in the Willamette System. Infrastructure on the system is unique and exponentially less resilient to the impacts of turbidity and sedimentation when compared to other sub-basins. The SEIS fails to properly analyze the unique differences of a deep drawdown in the North Santiam sub-basin.

3. Failure to Analyze Sufficient Reasonably Prudent Alternatives

There are numerous possible alternatives that would represent potential compromises between the "no action" alternative and the alternatives actually analyzed. Compromise alternatives could, for example, better protect water quality and downstream water uses with: (1) a smaller drawdown delayed and phased in over a longer period of time and (2) a Nephelometric Turbidity Unit (NTU) turbidity cap with NTU levels monitored at multiple locations (including both in-pool and at reasonable distances upstream from municipal water intakes) and an immediate pause in drawdowns immediately upon NTU levels exceeding scientific best practice levels.[3] Municipal water uses are working to align funding and adapt infrastructure to become more resilient but such improvements take time, and communities need time to adjust to potential impacts. Delay or other mitigation is warranted. Any changes must be very incremental, should involve written action plans for real-time collaboration with local governments, utilities, and the Oregon Health Authority, with clear, pre-impact anticipatory "off-ramps" objectively defined to

[3] Notably, the Army Corps should consult EPA turbidity research and rules on turbidity limits for public water systems. *See, e.g.,* 40 CFR 141.71-141.73 and https://www.epa.gov/dwreginfo/turbidity-provisions.

avoid damages. Failure to fully analyze and consider such compromise alternatives and allow public input on more alternatives makes the entire SEIS deficient.

4. **Failure to Coordinate with Local Governments**

The development of the draft SEIS does not meet the requirements for coordination with local governments under 42 USC §§ 4331 and 4332, 40 C.F.R. §§ 1501.1, 1501.2(4)(ii), and 1501.7(a)(1),[4] as well as under other rules, laws, and the federalism principles in the Tenth Amendment to the US Constitution. The Army Corps did not sufficiently consult with local governments along Detroit Lake and the Santiam River, such as Marion[5] and Linn Counties, the Cities of Salem, Stayton, Sublimity, Turner, Jefferson, Mill City, Gates, and Detroit, and water districts. Each local government should have been specifically invited to be coordinating agencies at each stage of the SEIS development process and provided a draft of the SEIS for preliminary comment prior to finalizing the draft for public release. It is similarly insufficient for the SEIS Section 1.6 to simply incorporate by reference the coordination section from the EIS since the coordination needs are different for the different purpose of the SEIS. Additional consultation would have flagged that alternatives like those above needed to be analyzed.

5. **Failure to Sufficiently Analyze Recreation Impacts**

The Army Corps tracks and reports data about value of recreation specific to Detroit Lake. See attached Army Corps report pulled from the Army Corps website just last week with data from 2023. The SEIS fails to adequately analyze the recreation impacts of a deep drawdown and does not even fully consider the data that the Army Corps itself collects and reports. Further, the SEIS fails to recognize the massively different recreational impacts between the proposals in the EIS and the SEIS.

6. **Inconsistency with Army Corps Mission**

All the alternatives other than the "no action" alternative do not respect the core principles of the Army Corps' mission and goals: statutory, regulatory, and otherwise, such as "maintaining America's infrastructure," "energizing the economy," and "providing recreation opportunities."[6]

Regards,
Steve Elzinga
Marion County Counsel

P.S. In solidarity with our local government partners, Marion County attaches comments from the City of Stayton, the City of Salem, and the Santiam Water Control District to elevate their voices in this process and further demonstrate issues with the SEIS and the significant impacts

[4] Although the statutes are still in effect, the CFRs were repealed in April 2025. Since this SEIS and the EIS it modifies were started prior to CFR repeals, these rules are still relevant to this SIES.
[5] Marion County is substantially affected by not being properly consulted on the SEIS and, if it was not already abundantly clear based on multiple comment letters and informal outreach, Marion County hereby requests substantive consultation under NEPA and all applicable rules and laws. Marion County also specifically requests to be provided a copy of the preliminary final SEIS for review before it is finalized and publicly released.
[6] https://www.usace.army.mil/About/CampaignPlan.aspx

on Marion County residents. The Army Corps must address all the issues they identify, including under the National Environmental Policy Act, Clean Water Act, Safe Drinking Water Act, the Endangered Species Act, Reclamation Act, Oregon Water Quality Standards, and all other concerns.

City of Stayton

Administration • Finance
362 N. Third Avenue • Stayton, OR 97383
Phone: (503) 769-3425 • Fax (503) 769-1456

January 12, 2026

By U.S. Mail and E-mail (willametts.eis@usace.arm.mil)

Liz Oliver, Portland District Project Manager
United States Army Corps of Engineers

Attn: CENWP-PME-E / Willamette SEIS
PO Box 2946
Portland, OR 97208-2946

RE: COMMENTS on SUPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (SEIS) DETROIT DAM DEEP DRAWDOWN (DDDD)

Dear Ms. Oliver,

The City of Stayton submits the following comments on the U.S. Army Corps of Engineers' November 2025 Draft Supplemental Environmental Impact Statement ("Draft SEIS") for the operation and maintenance of the Willamette Valley System. The City draws its water from the North Santiam River, downstream of Detroit Reservoir. While the Draft SEIS recognizes adverse impacts to downstream water systems and water quality from a drawdown of the reservoir, it does so generically and vaguely, without any indication that the Corps understands the significant impacts to the City's water treatment systems and ability to provide water to residents and for critical City functions. As a result, the Draft SEIS also fails to identify any mitigation for this effect. The Draft SEIS thus does nothing to reassure the City and its residents that the Corps not only understands that the drawdown of the Detroit Reservoir could destroy millions of dollars of City infrastructure and prevent the delivery of *any* water for personal and municipal uses but intends to ensure that, if the drawdown goes forward, the Corps will ensure that the effects are mitigated.

I. The Draft SEIS Does Not Sufficiently Identify Effects of the Detroit Reservoir Drawdown on City of Stayton Infrastructure & Water Use.

The Draft SEIS generically acknowledges that an effect of the proposed interim operations, including the late fall/early winter deep drawdown at Detroit Reservoir, will be to mobilize fine sediments and result in increased downstream turbidity, with associated effects to water quality and water treatment facilities. However, the Draft SEIS lacks the type of detailed evaluation of this effect that is required and that would allow the Corps to undertake a complete mitigation analysis. For example, the Draft SEIS identifies only increased maintenance and staffing of water treatment facilities and potential, unstated effects on water quality (e.g. at 170, 211). This reflects a lack of understanding that the type of municipal water treatment systems downstream of the Detroit Reservoir differ from those on the South Santiam in meaningful ways that will result in a significant and direct adverse effect on those systems and the communities they supply.

While the Draft SEIS references filtration broadly, it does not mention or evaluate the effect of a drawdown on the use of slow sand filtration (SSF) systems by multiple municipal water purveyors on the North Santiam River. SSF systems differ materially from rapid rate filtration, membrane treatment, or chemically assisted filtration processes (types used by South Santiam municipalities) in both design intent and operational resilience. As a result, generalized treatment references in the Draft SEIS do not adequately or accurately address how the sediment characteristics anticipated under the proposed action would affect SSF systems.

A. SSF Systems are Inherently Vulnerable to Very Fine Suspended Sediments and Elevated Turbidity

SSF systems vulnerability to fine suspended sediments is especially acute when those particles are dominated by silts, clays, colloids, organic fines, or algae. This vulnerability is a direct consequence of how slow sand filters function and where their treatment effectiveness is concentrated.

The primary treatment mechanism of a slow sand filter occurs at the surface biological layer (schmutzdecke) and within the upper ½ inch of the sand bed. Under normal operating conditions, this biologically active layer effectively removes pathogens and low concentrations of particulate matter through a combination of physical straining, adsorption, and biological degradation. However, when raw water contains sustained or episodic high turbidity, especially when dominated by very fine particles, those particles rapidly accumulate at the filter surface for

turbidities greater than 10 NTU.[1] This leads to premature clogging, a sharp increase in headloss, reduced hydraulic capacity, and shortened filter run times.

Very fine sediments are particularly problematic because they:

- Penetrate and compact the sand,
- Are poorly removed by simple sedimentation or hydraulic buffering upstream,
- Can smother or disrupt the schmutzdecke, reducing biological treatment effectiveness,
- Are slow to clear once loading subsides, even after turbidity levels return to baseline.

As turbidity increases, slow sand filters experience a non-linear loss of performance, where small increases in fine sediment loading can result in disproportionate reductions in filter run time and treated water output. This condition often necessitates frequent scraping or removal of the top sand layer, accelerating media loss, increasing labor demands, and reducing overall system reliability.

Once a slow sand filter is cleaned by scraping and the schmutzdecke is removed, the filter temporarily loses its primary fine-particle retention and biological treatment barrier. During this post-cleaning period, particularly if raw water turbidity remains elevated or is dominated by very fine sediments, fine particles penetrate deeper into the sand bed rather than being intercepted at the surface.

This deep bed penetration results in the progressive accumulation of fines within the interstitial pore spaces of the sand matrix, leading to internal clogging that is not readily reversible through surface scraping alone. Therefore, subsequent filter runs become progressively shorter, headloss development accelerates, and cleaning frequency increases – creating a compounding cycle of reduced performance and increased maintenance demand.

Repeated cleaning under these conditions also leads to:

- Accelerated loss of filter media due to frequent removal of the upper sand layers,
- Reduction in effective bed depth and treatment capacity,

[1] The Corps typically refers to FTU, Formazin Turbidity Units, while modern water treatment relies on NTU (Nephelometric Turbidity Units). FTU is a legacy turbidity unit derived from non-standardized nephelometric measurements, whereas NTU is the current standardized and regulatory unit; such values should not be assumed to be directly interchangeable, and when evaluating turbidity for the purpose of effects on treatment systems, the Corps should utilize NTU consistently.

- Increased risk of fines breakthrough during the filter ripening period before the schmutzdecke is fully re-established,
- Elevated potential for turbidity spikes or particulate passage into finished water, particularly during start-up following maintenance.

Over time, the combination of deep bed fouling, media loss, and shortened ripening periods can compromise both the hydraulic and treatment integrity of the filter, ultimately necessitating partial or full media replacement. These impacts are especially pronounced under conditions of recurring fine sediment loading, such as those associated with reservoir drawdowns, storm-driven watershed disturbance, or prolonged elevated turbidity events.

Accordingly, SSF systems exposed to fine sediment dominated turbidity face a cumulative degradation of performance, rather than isolated operational challenges, reinforcing the need for effective pretreatment, conservative operational thresholds, and alternative treatment or supply strategies during high-risk raw water conditions.

SSF systems are therefore best suited to consistently low-turbidity source waters with limited fine sediment variability. They are not resilient to highly variable or storm-driven turbidity events, nor to conditions involving reservoir drawdowns, watershed disturbances, or algal and organic fines. Without adequate upstream pretreatment such as roughing-filters, bank filtration, off-stream storage, or advanced pretreatment processes, SSF systems face a heightened risk of operational failure during fine sediment loading events.

In summary, **SSF systems are operationally fragile when exposed to very fine sediments and elevated turbidity**, making source-water protection, pretreatment, and conservative operational thresholds critical to maintaining compliance and system reliability.

Recent operability testing and system evaluations conducted by the City of Salem to evaluate the effect of higher turbidity on its slow sand filters indicate that sustained fine sediment–dominated and high turbidity conditions comparable to those anticipated during deep drawdown operations would rapidly compromise the operability of direct online SSF systems. Such conditions are expected to result in accelerated surface clogging, deep bed penetration of fine materials following cleaning, shortened filter run times, loss of effective biological treatment capacity, and heightened risk of particulate breakthrough during filter ripening. These outcomes would likely render continuous operation of SSF systems unsustainable over a very short operational period without alternative supply activation or substantial pretreatment. Unlike the City of Salem, which utilizes some pre-treatment that may reduce turbidity or the percentage of finer sediment particles, the City of Stayton utilizes a direct online SSF system. Direct online SSF systems receive "raw" water directly from the running river. Thus, Stayton's water treatment infrastructure is at even greater risk of turbidity-related impacts from the Detroit Reservoir drawdown than the City of Salem.

The impacts described herein do not constitute a mere issue of temporary exceedance of drinking water quality standards or treatability. Rather, the projected fine sediment–dominated turbidity conditions associated with the Detroit Reservoir drawdown present a material risk of physical and functional destruction of critical drinking water treatment infrastructure.[2]

Under sustained or recurring fine sediment loading, SSF systems are subject to irreversible or near-irreversible operational failure mechanisms, including deep bed fouling, accelerated and unrecoverable media loss, collapse of biological treatment function, and structural degradation of the filter bed. These impacts are not correctable through standard operational adjustments or short-term compliance measures and extend beyond the scope of conventional drinking water standards enforcement or treatment optimization.

As a result, the foreseeable consequence of the Detroit Reservoir drawdown is not merely degraded water quality or the need for increased staffing or maintenance, but the inability of affected municipal water systems to operate at all, leading to a cessation of potable water production. This would directly impair the provision of water for essential municipal purposes, including residential supply, fire protection, public health and sanitation, and other critical community functions. Once such infrastructure failure occurs, service cannot be restored without substantial reconstruction, extended outages, and reliance on alternative water supplies.

Accordingly, this effect must also be evaluated as an infrastructure impairment and service continuity risk, rather than only a drinking water standards or maintenance cost issue. Failure to do so will result in understatement of the severity of reasonably foreseeable effect, mischaracterize the nature of the harm, and preclude informed decision-making regarding avoidance, minimization, and compensation measures necessary to protect public health and essential municipal services.

B. Necessary Revisions to the Draft SEIS to Fully Analyze Impacts

The FEIS and Draft SIES do not sufficiently identify and analyze impacts to communities and infrastructure anticipated to result from the Detroit Reservoir drawdown. Considering the high risk that the proposed interim operations will cause physical and functional destruction of the City of Stayton's drinking water treatment infrastructure, rather than merely temporary drinking water standards exceedances, the City respectfully requests that the Final SEIS include

[2] This contrasts with the types of water treatment systems used by municipalities on the South Santiam River, which while degraded in effectiveness and life span during the 2023 and 2024 Green Peter drawdown, were not functionally destroyed.

the following analysis to ensure full understanding, informed decision-making, and protection of essential municipal services.

a. Explicit Identification of Vulnerable Treatment Infrastructure

The Final SEIS should explicitly identify the presence of SSF municipal drinking water treatment systems and, more explicitly, direct online SSF systems, downstream of Detroit Dam and acknowledge that these systems are inherently vulnerable to fine sediment–dominated and sustained high turbidity conditions to a degree not experienced by other types of treatments systems, including those on the South Santiam River.

b. Treatment- and Infrastructure-Specific Impact Analysis

The Final SEIS should evaluate treatment-process-level impacts, not solely source-water quality changes, including:

- Deep-bed penetration of fine sediments following filter cleaning,
- Accelerated and unrecoverable filter media loss,
- Collapse of biological treatment function,
- Compounding maintenance and cleaning requirements,
- Risk of particulate and turbidity breakthrough during filter ripening, and
- The potential for complete loss of treatment operability over even short drawdown periods.

The Draft SEIS recognizes that there will be a "moderate increase in sediment and turbidity levels downstream of Detroit Reservoir." (ES-9). However, nothing in the draft indicates the meaning of moderate in this context or The Final SEIS cannot reasonably compare alternatives without a clear recognition and understanding of the vulnerabilities of water-treatment systems downstream of Detroit Reservoir.

The Final SEIS should explicitly assess the risk that the proposed drawdown of the Detroit reservoir would result in physical impairment or destruction of the City's treatment infrastructure, leading to the **cessation of potable water production**, rather than only temporary noncompliance with drinking water standards. This assessment should address impacts to:

- Residential water supply,
- Fire protection and emergency response,
- Public health and sanitation,
- Other essential municipal and community functions.

c. Cumulative and Recurrent Impacts Analysis

Because the Detroit Reservoir drawdown is an action planned to be repeated at least annually, the Final SEIS should analyze the cumulative effects of recurring or multi-year drawdown-related turbidity events on SSF systems, including progressive degradation, loss of remaining useful life, and the increasing likelihood of permanent infrastructure failure over the interim operations period.

This analysis is particularly important given that, even after a significant 2023 drawdown that caused massive turbidity increases in the South Santiam River, during the 2024 drawdown, the City of Sweet Home again experienced such significant turbidity that its drinking water treatment system struggled, and a state of emergency was declared. The Corps' use of adaptive management to mitigate effects of the drawdown by immediately ceasing the interim operation to prevent further harm to the City of Sweet Home is laudable. However, considering that experience, it is concerning that the SEIS does not fully evaluate the effects of a 2025 Detroit Reservoir drawdown on downstream municipal water systems, and in particular SSF systems which are much more sensitive to turbidity and fines than those on the South Santiam.

II. The Draft SEIS Fails to Identify Mitigation Measures for Water Treatment & Infrastructure Impacts.

If the Corps determines that the proposed action will occur despite the high risk of major impacts to the City of Stayton, the Corps must identify and describe options for avoiding and minimizing the impacts in the Final SEIS. Given the significance of the risk, the Corps also should identify compensatory mitigation options to be implemented either as alternatives to avoidance and minimization, or because of effects on City infrastructure despite efforts to avoid and minimize them.

While the Draft SEIS indicates that an "Emergency Response and Communications Plan" will be utilized, it does not identify what that plan will cover, how and when it will be developed, and whether stakeholders, including the City of Stayton, will provide input on its development.[3] The mere indication that an undefined "plan" will be used by the Corp does not satisfy the requirement to identify mitigation options.[4]

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[3] To the extent such a plan already exists for the Detroit Drawdown, the City has not found it in the FEIS, Draft SEIS, ROD or on the Corps' website.

[4] The Corps' April 2025 Final Environmental Impact Statement for the Willamette Valley System Operations and Maintenance barely acknowledge impacts to community water systems and does not even mention mitigation for such impacts, much less an emergency communication plan, despite being published after the adverse effects of the 2023 and 2024 Green Peter Reservoir drawdowns were known.

A. Avoidance and Minimization Measures

Avoidance and minimization options necessary to prevent infrastructure damage should include, but are not limited to the following practices and limitations:

i. Turbidity Monitoring – Location and Particle Size

The location at which turbidity is monitored during a drawdown of the Detroit reservoir is critical to the meaningful protection of downstream drinking water treatment infrastructure. The draft SEIS identified the turbidity monitoring location as Niagara, i.e. after release of water from the Detroit dam. Turbidity monitoring conducted at Niagara or below spillway and outlet releases is inherently insufficient for operational decision-making because it detects sediment conditions after fine materials have already been entrained, mixed, and irreversibly released downstream.

Fine sediment–dominated turbidity, particularly silts, clays, colloidal particles, and organic fines, behaves fundamentally differently from coarser suspended material. These fine particles remain in suspension for extended periods, are not effectively attenuated once mobilized, and can penetrate deep into SSF beds once introduced into downstream treatment systems. Detection of elevated turbidity at a post-spillway or downstream monitoring location therefore occurs too late to prevent infrastructure damage or operational failure, as the sediment pulse has already entered the river system and is no longer controllable.

To be operationally meaningful, **turbidity monitoring must be conducted in-pool and upstream of release structures, where sediment mobilization can be detected prior to discharge** and where adaptive management actions—such as modifying drawdown rates, suspending the drawdown, or activating alternative operations—remain feasible. In-pool monitoring provides early indication of fine sediment entrainment, including the mobilization of legacy sediments exposed during drawdown, which are most likely to produce the fine particle size fractions that pose the greatest risk to SSF systems.

Reliance on post-spillway turbidity monitoring conflates impact confirmation with impact prevention and fails to account for the time lag between sediment mobilization, downstream transport, and treatment system exposure. Because SSF systems are vulnerable to rapid and irreversible degradation once fine sediment enters the treatment process, monitoring that occurs after release does not provide a practicable opportunity to avoid infrastructure damage or service interruption. The Final SEIS's identification of mitigation options must acknowledge that monitoring limited to post-spillway or downstream locations is insufficient for infrastructure protection and shall not be relied upon as the sole basis for operational decision-making.

Accordingly, to satisfy NEPA's requirement for meaningful impact disclosure and mitigation, turbidity monitoring associated with interim operations must be relocated or supplemented with in-pool, upstream monitoring points specifically designed to detect fine sediment mobilization before discharge. Without such monitoring, the proposed operations lack

an effective mechanism to prevent foreseeable infrastructure destruction and cessation of drinking water service in the City of Stayton.

ii. Adaptive Management and Triggered Operational Responses

The Final FEIS should articulate the components of an adaptive management plan aimed at avoiding and minimizing any effects on the City's infrastructure and ability to provide water for standard uses. Adaptive management for mitigation must include metrics and actions tied to the operational parameters and real-time status of the City's SSF system, and not solely to river turbidity monitoring results. Any adaptive management plan must include the following:

- Monitoring metrics specific to treatment operability (not solely river turbidity),
- Clear, enforceable operational triggers tied to infrastructure protection, and
- Defined response actions when operability thresholds are approached or exceeded.

Specific tools for this purpose should include:

- Operational turbidity and fine sediment thresholds identified in advance of each drawdown that, if reached, preclude the drawdown, require that the drawdown depth be limited, or trigger immediate halting of the drawdown,
- Modified drawdown timing, rate, or sequencing to limit sediment mobilization,
- Sediment management or pretreatment requirements upstream of City water intake, and
- Temporary and potentially permanent suspension of the drawdown during high-risk conditions, including when turbidity levels in the North Santiam River are higher than typical due to storms or other causes.

Implementation of an adaptive management plan with these tools will require continuous **direct** communication and coordination between the Corps and the City of Stayton during any drawdown, and the Final SEIS should identify the importance of such communication to success of the adaptive management tools.

iii. Determine Depth of Each Incremental Drawdown Annually Based on Monitoring of Conditions

The City appreciates that the Corps has recognized that the lack of an incremental approach to drawdowns of the Green Peter Reservoir led to major impacts on the water treatment systems of South Santiam municipalities and that a different approach is warranted for the Detroit Reservoir drawdowns on the North Santiam. However, given that the 2024 drawdown of the Green Peter Reservoir quickly resulted in emergency shutdown conditions for the City of Sweet Home despite the major flushing of accumulated sediment that had occurred during the 2023 drawdown, a rigid and pre-determined drawdown increases the likelihood that the impacts

to the City's water treatment system described above will occur. Instead, the depth of the drawdown should be determined prior to commencement of each drawdown based on annual monitoring of the pool depth, turbidity, and depth and location of newly deposited sediments.

B. Compensatory Mitigation

The most reliable option for avoiding the effect identified above also provides the most certainty: compensatory mitigation. The Final SEIS must identify compensatory measures sufficient to preserve drinking water and municipal water services continuity. Several compensatory measures obviate the need for any avoidance and minimization measures, because they all allow the City to cease water intake from the North Santiam River at the inception of a drawdown. Other compensatory measures ensure that City residences and businesses, and critical City functions, always have water available and allow repair and replacement of the SSF system. Compensatory mitigation measures considered in the Final SEIS should include at least:

- Guaranteed pre-drawdown access to alternative water supplies (e.g., interties to non-affected systems, off-channel storage, ASR),
- Funding or implementation support for construction of pretreatment systems or existing systems' hardening,
- Infrastructure replacement or rehabilitation provisions where damage is unavoidable,
- Emergency response planning and cost recovery mechanisms.

To the extent compensatory mitigation is required, the Corps should delay implementation of the Detroit Reservoir drawdown to 2028 because every option to protect the City of Stayton's municipal water system takes significant time to implement.[5]

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[5] The Corps FEIS and draft SEIS do not mention socioeconomic impacts. Without compensatory mitigation, the damage to the City's SSF system will cause significant indirect socioeconomic impacts. The median income of the City of Stayton residents is approximately $72,000, significantly limiting the ability of the City and its residents to bear the costs associated with damage to its infrastructure or to independently fund provision of clean drinking water during any shutdown of its system.

A failure of the potable water system would have immediate and severe consequences, potentially affect more than 10,000 residents and force the shutdown of businesses across Stayton and Sublimity (Sublimity's wastewater is disposed of through Stayton's wastewater system, which would fail to be operational without a potable water supply). Additionally, critical public safety, healthcare, and other essential facilities would be unable to operate, creating significant risks to public health, safety, and economic stability.

C. The Corps Should Refrain from Issuance of the Final SEIS and Postpone Detroit Reservoir Drawdowns Until Sediment and Turbidity Are Better Understood.

The Draft SEIS notes that the Corps is engaging a sediment transport modeling team to develop tools to inform adaptive management. This modeling will shed light on the magnitude of the initial, cumulative and recurrent effects on municipal water treatment systems that will be caused by the turbidity that will accompany planned annual repetition of the Detroit Reservoir drawdown. Effective adaptive management is critical to prevent loss of use and destruction of treatment infrastructure.

In addition, pursuant to the Water Resources Development Act of 2024, by January 2025, the Corps is expected to complete a report on the turbidity in the Willamette Valley System resulting from recent drawdowns. Given that the report will include analyses of lessons learned, changes in operations based on those lessons, and opportunities to minimize monetary strains on non-federal entities due to drawdown-related turbidity, the City of Stayton and other affected municipalities should be able to review and consider that report as it is highly relevant to the subject matter of these comments.

Thus, finalization of the SEIS and any drawdown of the Detroit Reservoir should be postponed, allowing completion of modeling and the turbidity report, review of results of both by affected parties, and submission of comments on the SEIS considering that information.

The City of Stayton appreciates the Corps' attention to this issue of critical importance to the City, its residents and businesses. Clear identification of the effects of the Detroit Reservoir Drawdown on City infrastructure not only are necessary to identify mitigation options but also to allow the Corps and City to work together to ensure that mitigation is sufficient and workable well in advance of the commencement of a drawdown.

Sincerely,

Julia Hajduk
City Manager

cc.
Brian Quigley City of Stayton, Mayor
Stephen Sims City of Stayton, Council President
Barry Buchanan, P.E. City of Stayton. Interim PWD

CITY MANAGER'S OFFICE
555 Liberty St SE / Room 220 • Salem, OR 97301-3513 • 503-588-6255 • Fax 503-588-6354

January 12, 2026

Delivered via Electronic mail and U.S. Post

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette SEIS
P.O. Box 2946
Portland, OR 97208-2946

Re: City of Salem Public Comments on Draft Supplemental Environmental Impact Statement

The purpose of this letter and its supporting attachment is to provide comments from the City of Salem (City) regarding the *Willamette Valley System Operations and Maintenance Draft Supplemental Environmental Impact Statement* (Draft SEIS) that was issued by the U.S. Army Corps of Engineers (USACE) in November 2025. The Draft SEIS fulfills two directives contained in the 2024 Water Resources Development Act: (1) It identifies options to permanently end federal hydropower production at eight Willamette Valley Dams; and (2) It evaluates options to comply with the Biological Opinion (BiOp) by the National Marine Fisheries Service (NMFS) regarding annual deep drawdowns of Detroit Reservoir. The City's comments are specific to the deep drawdowns, in which the level of Detroit Reservoir is proposed to be dropped to a historically low elevation each year to facilitate the out-migration of threatened fish species.

First and foremost, the City continues to support the actions of the USACE, NMFS, and other federal, state, and local agencies intended to enhance habitats and support out-migration of 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 members of the Tribal Nations. Finally, the City acknowledges and appreciates that the Draft SEIS addresses many of the concerns we have expressed to the USACE over the past 12 months. Among the significant commitments made by the USACE in the Draft SEIS that are responsive to our concerns:

(1) The USACE will "initiate the drawdown closer to late November or early December" (Page 18).
(2) The deep drawdown will be conducted "in a stepwise manner" (Pages ES-9, 210).
(3) The duration of the deep drawdown "is set to last for two weeks" (Page 18).
(4) The incremental deep drawdown approach "would span over three years" (Page 90).

However, the City remains deeply concerned at the absence in the Draft SEIS of any reference to turbidity triggers and accompanying action measures. As described and justified in our comments

below and in our previous comments (see Attachment), these two important operational factors must be incorporated into the Final SEIS.

Key Recommendation: Establish a Turbidity Trigger of 10 NTU/12 hours to Cease the Drawdown

It is critical that the USACE adopt a turbidity trigger which, if exceeded over a specified period of time, will cause the immediate cessation of drawdown operations and the resultant return of Detroit Dam and Detroit Reservoir to normal operating conditions. The purpose of the turbidity trigger is to protect human health, protect the City's water treatment system, and protect the City's customers. Once drawdown operations cease, it is anticipated that turbidity levels in the river will decrease over time and normal operations at the City's water treatment plant will be able to resume. Further, to provide time to restore normal operations and to evaluate lessons learned, once the turbidity trigger has been exceeded, drawdown operations should not resume again until the following year. This recommendation is based on years of operational experience coupled with scientific research conducted over the past 12 months.

Additionally, a turbidity trigger should be the minimum safeguard for downstream water users to protect from reasonably foreseeable environmental effects of the proposed action. The Thomas R. Carper Water Resources Development Act of 2024 (WRDA 2024) required that the Corps complete a report on instances in which turbidity concerns have arisen following a drawdown at a reservoir in the Willamette Valley, including "identify(ing) lessons learned associated with turbidity resulting from drawdowns and … how changes based on those lessons learned are being implemented." Absent completion of the report, the Corps should proceed with the drawdown of Detroit Reservoir under strict guidelines for downstream water quality while data is being collected and analyzed from similar operations in the Willamette Valley. Given that the Corps failed to analyze specific turbidity level effects from the proposed action on downstream users, a strict turbidity trigger that protects downstream users is a reasonably prudent alternative.

The specific recommendation is that the turbidity trigger should be set at a reading of 10 NTU[1] or above, experienced over a period of 12 consecutive hours, as measured at the United States Geological Survey's (USGS) Niagara gauge. (USGS-14181500).

ADDITIONAL BACKGROUND INFORMATION.

The City's Responsibilities as Regional Water Provider

The City is the only regional water provider in the Mid-Willamette Valley. We are responsible for supplying safe and reliable drinking water to approximately 220,000 individuals and thousands of properties that include hospitals, schools, businesses, industries, irrigators, multifamily housing units, and

[1] Nephelometric Turbidity Units (NTU) and Formazine Nephelometric Units (FNU) are measures of the clarity of the water. The City typically reports turbidity levels in NTU; the USACE typically reports turbidity levels in FNU. Although the two units reflect the same characteristics, the analytical methods used to determine FNU and NTU are different and the two are not numerically interchangeable. Generally, water with turbidity of 10 NTU or 10 FNU or less looks clear. Water with turbidity of 50 NTU or 50 FNU looks cloudy; water with turbidity exceeding 500 NTU or 500 FNU looks muddy.

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 48,000 citizens of the cities of Stayton and Keizer should either, or both, municipalities suffer impairment to their own drinking water systems.

High Turbidity Endangers Treatment System, Places Customers at Risk, Limits Future Growth

At issue is the fact that the deep drawdown of Detroit Reservoir will increase the presence of fine particles in the North Santiam River, the source of drinking water for the region served by the City. These particles pose a significant risk to the City's slow sand filtration treatment system that is located on Geren Island on the North Santiam River near downtown Stayton.

Highly turbid water, if allowed into our treatment system, will clog the sand filters. Run times between filter maintenance periods will be significantly reduced, the cost and time to recondition each filter will substantially increase, and drinking water production from our treatment plant will be considerably diminished. If, to protect the sand filters, the City closes the intake gates from the North Santiam River, our ongoing ability to meet water demand will depend solely on the amount of water stored in reservoirs, water drawn from a handful of wells, and water provided through interties with the City of Keizer. At this writing, the City has embarked on substantial capital investments, expected to cost approximately $8 million, to prepare for potential disturbances caused by the drawdown. These improvements are not yet complete. With these significant investments, the City believes we can meet winter demand during the 2026 deep drawdown but there is *no assurance* that we will be able to meet future demands, which are expected to grow higher with each passing year. Further, under this mode of operation there is *limited redundancy* in the system. Should a critical component of one or more of these alternative sources of drinking water fail, our ability to supply water may fall below the demand of our many customers. Depending on the severity and duration of the shortfall, the consequences range from temporary inconvenience to untenable and unsustainable risks to life, property, and livelihood.

In addition to limited potentially life-saving redundancy, operating a regional water supply system at or near capacity with no back-up will also create a significant and highly consequential condition – it could *limit opportunities for future growth*. Economic growth invariably relies on a region's ability to reliably provide essential services, water being the most critical of these. No housing deficiency can be addressed if there is insufficient water for new residential development. No new businesses, small or large, will locate in our service area if our ability to provide drinking water is questionable. No water-dependent industry seeking a new location will select Salem if we cannot provide assurances of reliable, year-round water for its production.

How the City Treats Water under Normal Turbidity Conditions

Under normal operating conditions, the City draws raw water from the North Santiam River through intake gates at our facility on Geren Island. This water is treated using slow sand filtration, a highly

reliable, time-tested method for producing drinking water. For sand filters to properly operate, the intake water must have very low levels of turbidity. Typically, the water drawn from the North Santiam River has a turbidity level of less than 10 NTU. At this level, our sand filters can operate for about three months before the filter must be taken offline for cleaning (scraping 0.25 to 0.5 inches from the top layer of sand) and reconditioning (allowing a biological layer of microorganisms to regrow on the surface of the sand).

How the City Treats Water under Elevated Turbidity Conditions

There are naturally occurring, short-term periods during which the turbidity levels in the North Santiam River increase well above 10 NTU. High turbidity is typically caused by storm events, which increase runoff volumes and sediment transport from up-river creeks and streams. The City's operational procedure in anticipation of high turbidity in the river involves filling the slow sand filters to their maximum capacity prior to the arrival of high turbidity and then closing the intake gates. With the gates shut, the filters can operate for about three days until low water levels in the filters required them to be taken offline. Historically, high turbidity levels triggered by storm events have lasted less than three days.

Results of Research on the Consequences of High Turbidity

There is little question that the deep drawdown will elevate turbidity levels in the North Santiam River, both during the initial drawdown, during subsequent drawdowns, and for a significant period of time after each drawdown operation has ended. As stated earlier, typical turbidity levels in the North Santiam River at our intake gates is less than 10 NTU. Of concern is information collected by the USACE during initial drawdowns in 2023 impacting the South Santiam River. Data provided by the USACE showed turbidity levels ranging from roughly 50 FNU (see footnote on Page 2) to over 450 FNU. Data from the most recent drawdown conducted in 2025 indicate sustained turbidity levels had decreased but still ranged between approximately 20 and 80 FNU. The adverse impacts of sustained elevated levels of turbidity in the City's intake from the North Santiam River are summarized below.

1. Short-term Impacts to Our Filters

   The City conducted extensive research in 2025 to determine the risks of keeping the intake gates open and allowing highly turbid surface water into a slow sand filtration system. Based on this bench-scale scientific testing, we now know that turbidity levels as low as 50 NTU will reduce the runtime of a slow sand filter from approximately three months to three weeks. Higher turbidity levels will result in even lower runtimes, some of which are less than 24 hours. Additionally, fine particles from highly turbid intake water can penetrate deep into a sand filter, essentially fouling the entire depth of the sand bed well beyond the typical 0.25-0.5 top inches. This will significantly increase the cost and complexity of reconditioning a filter and measurably reduce the life cycle of a filter from four years to less than two months. Restoring a filter to full operational status once the filter has been terminally fouled can require up to six months to drain the water, remove the clogged layer of sand, procure and then replace the bed with new sand, and restore the biological layer in the rebuilt filter bed. The time required to return a filter from failure to full operational status is expected to extend beyond winter drawdown and into the summer months, a period during which water demand will be at its highest. The estimated cost to replace

a filter bed ranges between $3 million and $4 million *each*. The City will have no choice but to pass this cost burden to our customers in the form of rate increases.

2. The Longer-term and Recurring Impacts
   The adverse impacts of highly turbid water entering the City's sand filtration system extend well beyond the immediate period of the deep drawdown. Rehabilitating filters lost to sustained turbidity is a labor-intensive and expensive endeavor. There are long-term consequences related to increases in operating and capital budgets which will drive utility rates higher. There are challenges related to limited staffing, uncertainty in supply chains and procurement, and indeterminate planning timelines. The time required to restore filters to full operation may extend into the spring and summer months, a period during which water demand is at its highest. Among the potential consequences is the real possibility of compromising the City's ability to meet peak summer demands while, concurrently, adversely impacting the City's ability to prepare for the next deep drawdown later in the same year.

3. Risks of Total Reliance on Alternative Water Sources
   If the intake gates remain shut because of high turbidity in the river, or if the sand filters are offline for cleaning and reconditioning post-drawdown, the City must rely on water drawn from groundwater wells, water stored in our reservoirs, and water provided via an intertie with the City of Keizer. Depending on the time of year, the duration of the high turbidity, and the time needed to restore operations of slow sand filter(s), these alternate sources may not be able to meet the demand of our water customers. We estimate that existing alternative water sources – wells, reservoirs, and interties – will meet the projected water demand during the timeframe of the first proposed drawdown. However – and this is a significant consideration – under this mode of operation there is *limited 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, creating an unacceptable risk to human health and safety.

Advantages of Implementing Turbidity Triggers and Action Measure

Among the advantages to having turbidity triggers.

Frames Intergovernmental Collaboration

Including this turbidity trigger level and action measure in the Final SEIS will require the City and USACE engage in follow-up conversations to establish details such as: communication protocols, pre-approved authorities for implementation of action steps, reporting requirements, and specific details regarding the immediate and follow-on measures to be taken.

Facilitates Compliance with the Federal Clean Water Act

Adopting turbidity triggers would also allow USACE to reconcile the proposed drawdown action with potential violations of the federal Clean Water Act (CWA). The CWA addresses, among many other things, contaminants in water resources. There is no doubt that causing high levels of turbidity

should be considered a violation of the CWA. Water quality sampling data show that typical turbidity levels at the City's intake from the North Santiam River are well below 10 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 turbidity levels reported by the USACE during drawdown operations on the South Santiam River clearly violated federally approved state water quality standards. There is little doubt that turbidity levels in the North Santiam River during the deep drawdown will rise above "natural stream turbidities" by more than 10 percent. From a regulator perspective, once a violation in water quality standards has occurred, among the correction actions is to cease the activity causing the violation. The Oregon Department of Environmental Quality may consider a turbidity trigger and corrective action to stop the drawdown as appropriate measures which will allow the USACE to avoid liability related to violations of state and federal law.

Supports Compliance with the Federal Safe Drinking Water Act

Adopting turbidity triggers would also allow USACE to reconcile the proposed drawdown action with potential violations of the federal Safe Drinking Water Act (SDWA). The Safe Drinking Water Act (SDWA) requires persons to protect public water systems. The Draft SEIS does little to address potential violations of the SDWA. The proposed drawdown is expected to 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 SDWA.

SUMMARY OF RECOMMENDATIONS AND CONCLUSION

Six Recommendations

While there is much to be commended in the Draft SEIS, the City presents to the USACE six specific recommendations for incorporation into the Final SEIS.

Recommendation #1: Acknowledge the Significance of Increased Turbidity

The City disputes that the proposed drawdown of Detroit Reservoir, even following a stepwise approach, would cause only a "moderate increase in sediment and turbidity levels" in the North Santiam River (see Page ES-9). The word "moderate" is subjective and situational. Based on our best professional judgement, which is now backed up by extensive research and bench-scale testing, levels of turbidity as low as 50 NTU – a measure potentially viewed as "moderate" by some – will have

significant and sustained consequences to our treatment systems. For the Final SEIS, a more accurate sentence would read:

> *For water quality and drinking water, the deeper drawdown of Detroit Reservoir would cause ~~a moderate~~ an increase in sediment and turbidity levels downstream of Detroit Reservoir during the operation. This increase will threaten the operation of the slow sand filtration systems operated by the City of Salem and the City of Stayton.*

Recommendation #2: Establish the Need for a Turbidity Trigger and USACE Response

A stepped approach alone is insufficient to protect human health and safety for communities relying on the North Santiam River for drinking water, firefighting, industrial production, and commercial purposes. The USACE *must* adopt in the Final SEIS a clear turbidity trigger consisting of a NTU level that, if exceeded over a specific period of time, will require cessation of the drawdown operation. A turbidity trigger with mandated actions will provide a degree of certainty and significantly enhance the City's ability to develop contingency and recovery plans. This recommendation comes with a commitment by the City to work with the USACE and to share information, data, and research results to help support a turbidity trigger that protects public health, lowers risks, supports long-term objectives of the drawdown, and reflects current scientific research and sound engineering practices.

Recommendation #3: Establish a Turbidity Trigger of 10 NTU over 12 Hours to Cease Operations

The City's specific recommendation, which is consistent with multiple conversations with the USACE and supported by scientific research, is that a firm turbidity trigger of 10 NTU should be established in the Final SEIS. Based on the anticipated variability of turbidity in the North Santiam River during the drawdown, the City further recommends that a time duration of 12 hours be incorporated as part of the trigger. Once this trigger is reached, the USACE should cease all drawdown activities for that year and allow the City's water treatment system to recover and resume full operation. Based on the studies and research conducted, the City strongly recommends that the USACE establish in the Final SEIS a turbidity trigger as follows:

> **The USAC will immediately take steps to cease the deep drawdown operation and restore Detroit Dam and Detroit Reservoir to normal operations the moment turbidity levels in the North Santiam River, as measured at the USGS Niagara gauge, have been at or above 10 NTU for 12 consecutive hours.**

Recommendation #4: Evaluate Merits of Delaying Implementation

The Final 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 develop and test

wells currently under construction to determine if they have sufficient yield to provide resiliency and mitigate risks to life, property, and livelihood.

Recommendation #5: Focus on a Long-term Strategy of Implementing Structural Solutions

Our read of the BiOp, the Final Programmatic Environmental Impact Statement[2], the Draft SEIS, and various reports and evaluations, is that the long-term strategy does not focus on year over year deep drawdowns. However, the long-term strategy *requires implementation* of structural remedies designed to facilitate out-migration of threatened species. The current Draft SEIS considers annual deep drawdowns of Detroit Reservoir as an "Interim Operation" that will occur "until the long-term solution for downstream fish passage and water temperature management at the respective location is in place and operational" (Page 17). We agree, but as written in the Draft SEIS, as implied in recent public meetings, and as demonstrated by the years that have passed since the structural solutions were first proposed, implementation of structural measures have not been a priority. The Final SEIS should clearly state the intention of the USACE to pursue all means available to secure funding, initiate project planning, and ultimately construct what is expected to be the long-term strategy to support the out-migration of threatened species. Until these measures are in place, the financial burden and high-risk scenarios are being borne not by the responsible federal agencies but by local jurisdictions and our ratepayers.

Recommendation #6: Employ Adaptive Management with Each Annual Drawdown

The underlying Biological Opinion for the Willamette Valley System requires development of an Adaptive Management Plan that includes "decision criteria" that guide strategies (see Section 2.5.10 of the BiOp). At issue for the City is a pressing 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 winter water demand. If the City adds a new industrial customer with a high, year-round water demand, the risks/consequences assessment must be reevaluated.

(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 that year's deep drawdown.

[2] "Willamette Valley system operations and maintenance: Final environmental impact statement." United States Army Corps of Engineers. Portland District. April 2025.

In the context of Adaptive Management, there is the ambiguity in the Draft SEIS regarding the duration of the drawdown, which "is set to last two weeks" (Page 18) and the timespan of the incremental steps toward the ultimate desired elevation in the reservoir which "would span over three years" (Page 90). For our purposes of operational planning and risk management, the City requires assurances that the duration of the deep drawdown "~~is set to last~~ will not exceed two weeks" and the incremental drawdown approach "would span ~~over~~ at least three years." Further, a requirement for the USACE to conduct additional analysis, reviews, and consultation with affected parties should incorporated into the Final SEIS to provide assurances that the USACE will employ both science-based *and* risk-based decision making during the course of adaptively managing the drawdown operations over the years.

Conclusion

In conclusion, the City is grateful that the Draft SEIS addresses several of the concerns we have expressed over the past year in our conversations with the USACE regarding the risks each deep drawdown will present to our water treatment plant and our customers. However, the absence of any references to turbidity triggers and action measures is deeply troubling. Clear triggers and actions are essential for the City's operational and contingency planning. Establishing mutually acceptable triggers and action measures also represents the best way forward for providing assurances to our current and future regional customers that safe drinking water will continue to be reliably delivered. Lastly, turbidity triggers and action measures will facilitate the USACE's compliance with the federal Clean Water Act, federal Safe Drinking Water Act, and Oregon State Water Quality Standards, among other regulations. 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 without some kind of documented assurances that the drawdown operations will cease before the high levels of turbidity have resulted in highly consequential harm has occurred to our treatment system and our customers have been placed at risk.

The City is committed to working with the USACE and others to evaluate and, ultimately, to implement measures that support downstream passage of juvenile species, protect habitat and water quality, ensure water demands are met, and provide for the many users of the North Santiam River.

Sincerely,

Krishna Namburi

Krishna Namburi
City Manager

Attachment: "City of Salem Public Comments on USACE's Proposed Detroit Reservoir Drawdown." *Letter*. Salem, Oregon. June 20, 2025

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:

Brian D. Martin, PE, Public Works Director
Dan Atchison, City Attorney

Davis Wright Tremaine LLP

Suite 700
560 SW 10th Avenue
Portland, OR 97205-2702

Olivier Jamin
5037785346 tel
Olivierjamin@dwt.com

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.

SANTIAM WATER CONTROL DISTRICT
284 E Water St, Stayton, OR 97383
Santiamwater.gov

Date: January 13, 2026

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

RE: Comments on the Willamette Valley System Supplemental Environmental Impact Statement (SEIS)

Dear Project Team,

Executive Summary

SWCD appreciates the opportunity to comment on the SEIS. Our position is clear: irrigation remains the primary purpose of Bureau of Reclamation water rights in the North Santiam Basin. While we recognize the need for narrowly tailored measures to comply with ESA requirements, we strongly oppose broad or permanent reallocation of irrigation water for other uses. The SEIS must address critical gaps in modeling, legal compliance, and operational planning. Failure to do so risks violations of NEPA's hard look requirement (42 U.S.C. § 4332(2)(C)), arbitrary and capricious decision-making under the APA (5 U.S.C. § 706(2)(A)), and potential ESA non-compliance. Key concerns include reservoir refill uncertainty, climate resilience, water quality risks, coordination failures, equity in allocation, and USBR's lack of leadership on irrigation impacts. Importantly, maintaining a moratorium on new agricultural irrigation contracts while holding water in Detroit Reservoir for recreational purposes is inequitable and contrary to BOR's irrigation mission. This inequity could result in thousands of acre-feet of water being withheld from agricultural use annually, causing severe economic harm to the District as well as regional producers. These issues have significant economic consequences for agriculture and municipal supply and expose agencies to litigation risk if not resolved.

Introduction

On behalf of the Santiam Water Control District (SWCD), thank you for the opportunity to provide comments on the Supplemental Environmental Impact Statement (SEIS) for the Willamette Valley System. SWCD manages critical water rights and infrastructure serving agricultural producers, municipal partners, and environmental stakeholders in the North Santiam Basin. Our operations include delivery of raw water to the City of Stayton and management of irrigation water including Bureau of Reclamation (BOR) contract water. The proposed operational changes outlined in the SEIS have significant implications for water reliability, municipal supply, agricultural productivity, and ecological objectives. These comments build upon our prior submissions and incorporate new considerations introduced in the SEIS. Our intent is to ensure the Final SEIS fully addresses operational, contractual, and environmental consequences of proposed alternatives, consistent with NEPA (42 U.S.C. § 4332), ESA (16 U.S.C. § 1536), Oregon water law, and federal reclamation law.

I. Carry-Forward Comments from Previous EIS Submission

1. Contract Holder Protections: Existing contract holders must be grandfathered and protected from disproportionate reductions. All new contracts should utilize a proportionate reduction system during shortages (Draft SEIS, Section 3-1004). Preference should be given to existing users and ESA needs before new uses are contemplated to align with Oregon water law.

2. Water Rights and Storage: The SEIS should provide a tabulation of storage amounts and releases per reservoir and use (Draft SEIS, Appendix N). Clarify potential conflicts with Oregon water law and priority dates to prevent litigation risk.

3. Biological Opinions (BiOps): Explain the relationship among the 2008, 2019, and forthcoming BiOps and clarify the moratorium on new irrigation contracts in the Santiam Basin (Draft SEIS, Section 3-1033). Failure to reconcile these obligations creates uncertainty and potential ESA compliance issues.

4. Water Management Framework: Develop an adaptive management plan that balances ESA flow targets with other objectives (Draft SEIS, Appendix N). Outline proportionate reduction strategies for future contracts to ensure fairness and compliance. Resolve current US BOR contract language with SEIS and EIS operational concepts.

5. Modeling and Data Accuracy: Use current datasets such as the 2020 Modified Flow Dataset (Draft SEIS, Section 2.3.3). Clearly state assumptions and correct inaccuracies,

including evaporation embedded in inflow calculations, which could misrepresent available storage.

6. Impact Analysis: Conduct reservoir-specific analysis rather than system-wide only (Draft SEIS, Section 3-1033). Quantify ESA flow needs at the tributary level to avoid masking major localized impacts.

II. New Concerns Specific to the Supplemental EIS

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 storage 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. The release of flows in the fall could affect two separate water years (pre and post Oct 1) and therefore storage allocations, releases and water right compliance should be clarified.

Equity in Allocation

The SEIS does not clearly define prioritization during shortages (Draft SEIS, Section 3-1004). Proportionate reduction strategies across user types are necessary to ensure fairness and compliance with Oregon water law. Maintaining a moratorium on new agricultural irrigation contracts while continuing to store water in Detroit Reservoir primarily for recreational purposes is inequitable and contrary to BOR's irrigation mission. This practice fails to meet NEPA's requirement for a balanced evaluation of alternatives and consideration of socioeconomic impacts. Allocation decisions should prioritize irrigation and ESA compliance over discretionary uses such as recreation, consistent with NEPA's requirement for balanced evaluation of alternatives.

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.

USBR Accountability

USBR holds statutory obligations under the Reclamation Act (43 U.S.C. § 371 et seq.) to protect irrigation users, yet the EIS and SEIS demonstrates inadequate involvement by USBR in analyzing irrigation impacts. Responsibility is delegated to USACE, whose primary mission does not include irrigation economics or water rights administration (Draft SEIS, Appendix N). This creates a regulatory gap and potential legal liability for USBR under NEPA and the APA (5 U.S.C. § 706(2)(A)), as foreseeable impacts to irrigation users have not been analyzed. Furthermore, USBR's failure to address the Corps' practice of holding water for recreation while restricting agricultural expansion exacerbates inequities and undermines federal reclamation objectives. This policy choice, if left uncorrected, may constitute arbitrary and capricious action under APA standards and expose agencies to litigation risk for failing to consider reasonable alternatives that protect irrigation interests.

BOR Water Rights and ESA Compliance: The Bureau of Reclamation water rights held in the North Santiam Basin were established for irrigation purposes under federal reclamation law. SWCD does not support broad or permanent reallocation of these irrigation rights for other uses, as doing so would undermine the original purpose and reduce reliability for agricultural users who depend on these allocations for crop production and economic stability. The District is particularly concerned with adding or including operations that require stored water and would trigger a shared reduction related to our current contract language. However, SWCD recognizes that limited, temporary adjustments may be necessary to meet legal compliance obligations under the Endangered Species Act (ESA). Any such measures should be narrowly tailored, science-based, and transparent, with clear mitigation strategies to minimize adverse impacts on irrigation deliveries. USBR must lead this analysis and coordination, as delegating responsibility to USACE—whose mission does not include irrigation economics or water rights administration—creates a regulatory gap and exposes both agencies to potential legal liability under NEPA and the Administrative Procedure Act for failing to adequately analyze foreseeable impacts to irrigation users.

SWCD commends the Corps for its efforts in preparing the SEIS and appreciates the opportunity to provide input. We request that the Final SEIS incorporate tributary-specific modeling and updated climate data, provide comprehensive analysis of contractual obligations and mitigation strategies, address water quality risks and outline robust contingency planning, ensure transparent communication and equitable water management, and engage USBR in a leadership role to avoid regulatory gaps and legal exposure. SWCD reserves all rights under NEPA, ESA, and APA to ensure compliance with applicable laws and regulations. Please contact our office at [phone/email] for any clarification or further discussion.

Respectfully submitted,

Brent Stevenson

Brent Stevenson
District Manager
Santiam Water Control District

County Commissioners
Colm Willis, Chair
Kevin Cameron
Danielle Bethell

Chief Administrative Officer
Jan Fritz

County Counsel
Steve Elzinga

MARION COUNTY LEGAL COUNSEL

January 13, 2026

Via Email: Willamette.EIS@usace.army.mil
Via Regular Mail:
U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946
Portland, OR 97208-2946

Re: Need to Revise Willamette Valley System Draft SEIS to Reflect Full Fish Death Impact

To Whom It May Concern,

On behalf of Marion County, we submit these additional comments regarding the Willamette Valley System Draft SEIS. Careful review and fidelity to federal law is important for protecting all aspects of the environment, especially water quality for Marion County residents.

Under 42 U.S. Code § 4332(C), all environmental impact statements must include "a detailed statement" on "reasonably foreseeable environmental effects of the proposed agency action" among other things.

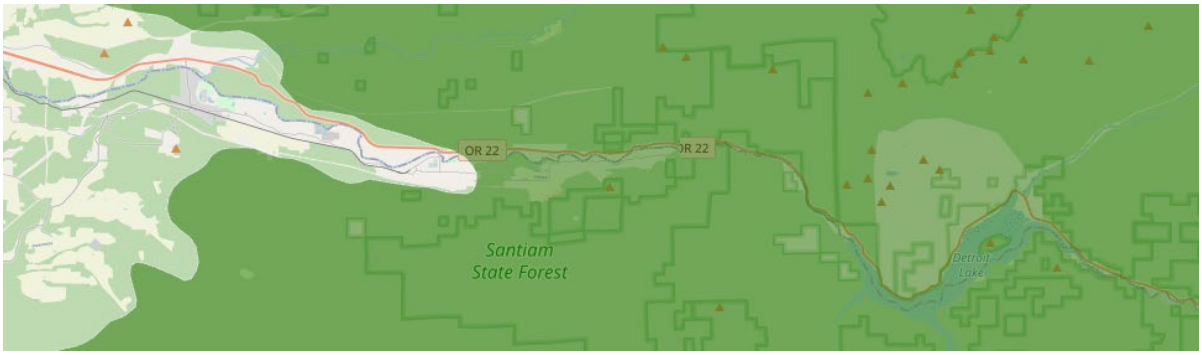
The draft SEIS admits that the proposed deep drawdown of Detroit Lake will harm overall fish populations: "Sport fishing in Detroit Reservoir is expected to be adversely affected due to changes in the reservoir habitat conditions and food availability affecting fish growth and survival, and increasing rates of entrainment for resident fish downstream of the dam []. Many entrained resident fish will be injured or not survive passage through the dam. For some species, significant reductions in abundance are possible." SEIS pages 134-135.

This is not just speculation: a massacre of over a million kokanee salmon occurred after a 2023 court-ordered deep drawdown at Green Peter Reservoir.[1] The Army Corps recognized that the deep drawdown directly caused many kokanee salmon to die "from barotrauma, a condition caused by a rapid pressure reduction as fish pass from deep below the surface on one side of the dam to the other side near the surface level. Among divers, this decompression effect is known as 'the bends.'"[2]

[1] An initial Army Corps' 2023 press release said over 8,000 had died. https://www.nwp.usace.army.mil/Media/News-Releases/Article/3553140/deep-reservoir-drawdown-at-green-peter-dam-causes-barotrauma-death-for-thousand/ By 2024, the Army Corps' Willamette Valley Project fisheries biologist was quoted at a public meeting as saying more than one million Kokanee died. https://www.sweethomenews.com/aggressive-deep-drawdown-begins-this-week/
[2] https://www.nwp.usace.army.mil/Media/News-Releases/Article/3553140/deep-reservoir-drawdown-at-green-peter-dam-causes-barotrauma-death-for-thousand/

Above is a screenshot excerpt of a picture from the Army Corps' own press release showing some of the many kokanee salmon killed by the 2023 deep drawdown.[3]

The draft SEIS does not comply with federal law because it fails to sufficiently assess how the proposed action will impact ESA-listed species, including how the admitted harm to overall fish populations will effect ESA-listed species who would otherwise consume those fish. For example, the Grey Wolf is listed as endangered, and the U.S. Fish & Wildlife Service says their range (shown in dark green below) includes the Detroit Lake area:[4]



Multiple studies have shown that Grey Wolves "are opportunistic-generalist carnivores and exhibit considerable dietary plasticity both among and within populations. Previous studies have documented extensive use of a wide variety of foods including birds . . . [and] fish."[5]

Impacts on the endangered Grey Wolf are not analyzed in the SEIS as required by federal law. As such, the SEIS fails to comply with federal law and must be revised. Once this revision occurs, the public should have another opportunity to comment.

Regards,
Steve Elzinga
Marion County Counsel

---

[3] *Id.*
[4] https://www.fws.gov/species/gray-wolf-canis-lupus
[5] *See, e.g.,* Watts, et al., *The Ilnik wolf* Canis lupus *pack: use of marine mammals and offshore sea ice*, Wildlife Biology, 16(2):144-149 (2010), available at https://bioone.org/journals/wildlife-biology/volume-16/issue-2/09-040/The-Ilnik-wolf-Canis-lupus-pack--use-of-marine/10.2981/09-040.full

From:	Dibble,Rachel L (BPA) - PT-5
To:	CENWP-PME-Williamette-Valley-System-EIS; Wells, Elizabeth R CIV USARMY CENWP (USA)
Cc:	Dickerson, Peter D CIV USARMY CENWD (USA); Thompson, Bradley E CIV USARMY CENWD (USA); Welch,Dorothy W (BPA) - E-4; Kintz,Jesse H (BPA) - PG-5; Jeff Maslow
Subject:	[Non-DoD Source] RE: Willamette Valley System Supplemental EIS Comments
Date:	Tuesday, January 13, 2026 4:39:15 PM
Attachments:	BPA_WVS_DSEIS_Comment_Letter_FINAL.pdf

My mistake! I attached a previous set of comments. Please disregard and use this version with today's date. Sorry about that. Thanks.

From: Dibble,Rachel L (BPA) - PT-5
Sent: Tuesday, January 13, 2026 4:25 PM
To: 'Willamette.EIS@usace.army.mil' <Willamette.EIS@usace.army.mil>; Elizabeth.R.Wells@usace.army.mil
Cc: Peter.D.Dickerson@usace.army.mil; 'Bradley.E.Thompson@usace.army.mil' <Bradley.E.Thompson@usace.army.mil>; Welch,Dorothy W (BPA) - E-4 <dwwelch@bpa.gov>; Kintz,Jesse H (BPA) - PG-5 <jhkintz@bpa.gov>; Maslow,Jeffrey J (BPA) - EC-4 <jjmaslow@bpa.gov>
Subject: Willamette Valley System Supplemental EIS Comments

Dear Ms. Wells,

Attached, please find Bonneville's comments on the Willamette Valley System Supplemental Environmental Impact Statement.

Thank you.

Rachel Dibble
BONNEVILLE POWER ADMINISTRATION
DEPARTMENT OF ENERGY
Vice President | Power | Generation Asset Management
rldibble@bpa.gov | O: 360-619-6191 | C: 971-207-2243

Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

January 12, 2026

In Reply refer to: PG-5

Liza Wells
U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946 Portland, OR 97208-2946

Dear Ms. Wells:

Bonneville submits the following comments on the Willamette Valley System Operations and Maintenance Draft Supplemental Environmental Impact Statement (DSEIS). Since 2020, Bonneville has been a Cooperating Agency supporting the development of the National Environmental Policy Act (NEPA) analysis. As the Cooperating Agency with special expertise in power and transmission, and the only federal agency entrusted by Congress to market federal power from the Willamette dams, Bonneville recommends important corrections and clarifications to incorporate into the Final SEIS. This letter also reiterates our significant concerns regarding the process used to develop the DSEIS and the resulting analysis of the non-hydropower alternative (Alternative 6).

Given our concerns, Bonneville elected not to provide power and transmission analysis during the DSEIS drafting and analysis of Alternative 6 due to a fundamental disagreement with the process that the US Army Corps of Engineers (Corps) followed in preparing the DSEIS and in carrying forward an unfeasible non-hydropower alternative for detailed study. Bonneville's comments center on the misdirected alternative-development process and the lack of viable solutions in the non-hydropower alternative. This DSEIS does not identify a realistic or implementable path to address uneconomic hydropower or adequately respond to Congress's directive authority to formally analyze an alternative that ceases hydropower operation.[1] Bonneville renews its request for a full reset of the current analytical approach by focusing on a dam-by-dam analysis and meeting the still-outstanding deliverables from the Water Resources Development Act (WRDA) of 2022 to complete the disposition studies at each of the Willamette dams. It is critical that this reset occurs through a meaningful collaborative process with all interested stakeholders.

Bonneville must maintain an economical and reliable power supply.[2] Escalating costs due to diminished power generation resulting from current and ongoing interim operations, coupled with Bonneville's likely funding of capital-intensive fish infrastructure under the DSEIS, substantially erodes the economic benefits to the Pacific Northwest of hydropower generated at the Willamette dams. In addition, hydropower generation at Willamette dams already takes a backseat to all other authorized purposes. In most cases, hydropower generation is a byproduct of the need convey water to dissipate energy and meet fish operational objectives; therefore, it cannot consistently provide reliable baseload generation that efficiently responds to regional power demands. Taken together, the declining cost-effectiveness and ongoing limited flexibility that

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would occur under most alternatives, including Alternative 6 in the DSEIS, calls into question whether hydropower production at the Willamette Valley System dams delivers acceptable outcomes for the region, as envisioned when first authorized by Congress.

This DSEIS process lacks the necessary degree of transparency and collaboration to develop a feasible non-hydropower alternative. The Corps has rejected Bonneville's multiple requests to collaborate with the Cooperating Agencies and interested stakeholders to transparently develop an alternative that considers reasonable non-hydropower measures on a dam-by-dam basis. In Bonneville's judgment, the Preferred Alternative (Alternative 5) is not technically and economically feasible because it requires considerable unproven and costly modification of existing dams. The Corps did not utilize the Congressional guidance to fully evaluate alternative designs that would not be constrained by the need to continue hydropower operations. Instead, the Corps unilaterally constructed Alternative 6 as a hypothetical scenario unconnected to the biological objectives of the DSEIS. Bonneville believes that the collaborative consideration of reasonable alternatives evaluating non-hydropower measures on a dam-by-dam basis would provide a more technical and economically feasible alternative. Bonneville is concerned that the lack of a feasible non-hydropower alternative risks the DSEIS falling short of carrying forward for detailed study the reasonable range of alternatives that NEPA requires.

Alternative 6 is not the DSEIS alternative that Congress or the region envisioned. The Corps' narrow reading of language in WRDA 2024 was unhelpful because it resulted in a lack of nuanced or creative dam-specific non-hydropower scenarios. This is a missed opportunity to work with the region to holistically evaluate faster, more cost-effective means to safer passage for ESA-listed fish. The Corps declined to pursue Bonneville's requests to consider realistic dam-specific scenarios, including one that would leave hydropower turbines in place and reclassify hydropower generation from an authorized power operation to an incidental byproduct of the remaining authorized purposes (e.g., fish passage).

The Corps considered a partial deauthorization scenario that would maintain generation sufficient for each project's needs and "right sizing" turbines to meet at-project needs while eliminating commercial hydropower production. That approach is neither necessary nor cost-effective. Bonneville questioned the technical merits of these scoping assumptions during previous processes to respond to WRDA 2022, and the DSEIS process did not allow for additional examination of these assumptions during the NEPA analysis process. It is also concerning that Corps staff make public representations about having analyzed the very passage concepts Bonneville sought to evaluate in this DSEIS and determined them infeasible without any documentation or public input. The Corps presented their draft Alternative 6 to cooperators without previously consulting Bonneville, an agency with special hydropower expertise, before screening non-hydropower concepts from further consideration. For example, Bonneville and other stakeholders have not had the opportunity to fully explore the durability of the dam-safety justification appearing in the Corps' description of its DSEIS alternative development process (DSEIS Appendix A, A-28 to A-30).

Bonneville also reiterates its longstanding concern that the DSEIS continues a problematic pattern of under-representing the impacts on power from EIS alternatives in light of the ongoing interim operations. Interim operations began with the U.S. District Court for the District of Oregon's injunction in the fall of 2021 and immediately reduced generation by as much as 40% on an average annual basis. On short notice and without sufficient consultation with Bonneville or the region, the Corps embedded these operations to be implemented in parallel with the alternatives, including Alternative 6. This approach effectively cements these interim operations into place for decades. The operations have already dramatically reduced the economic viability of Willamette hydropower, now and into the future. The DSEIS assumes these interim operations as a given and because of that, doesn't include them in the characterizations of hydropower

impacts within the alternatives. This approach results in an under-representation of the amounts and value of any residual hydropower within the alternatives over the study period.

In addition to this fundamental disagreement over the Corps' process for developing Alternative 6, Bonneville also believes that several specific DSEIS power and transmission characterizations and analysis areas need to be corrected or clarified for the Final SEIS. Bonneville thus requests the following changes before a Final SEIS is issued:

- Bonneville requests that the Corps explicitly summarize in the Executive Summary, Chapter 2, and Appendix A all the concerns that Bonneville has raised regarding the SEIS alternative development process and more thoroughly explain why an alternative that would leave hydropower turbines in place was not carried forward for detailed study in the SEIS.[3]
- The DSEIS incorrectly analyzes and characterizes transmission reliability impacts, including "islanding" impacts, which are Bonneville's area of expertise. Bonneville recommends the following changes:
    - In the executive summary and environmental consequences discussions (Chapter 3), the Corps should add a disclaimer that transmission is beyond the Corps authority, control and responsibility for all transmission impact areas as it has with all the DSEIS's power analysis areas.
    - In the executive summary on page 8, the Corps should remove the mention of islanding as a primary consequence of Alternative 6. Islanding is also impacted under interim operations and in other alternatives and highlighting islanding as a primary consequence of Alternative 6 above other impacts is inappropriate and misleading. Indeed, the Corps has excluded interim operations from the no-action analytical baseline despite interim operations already limiting islanding capability.
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It has been five years since Congress first directed the Secretary of the Army to perform an initial analysis on removing power from Cougar and Detroit, and three years since Congress directed the Secretary to perform a disposition study on the removal of the power purpose on the Willamette Valley System as a whole. In that time, no public draft of either report was shared. The Corps has presented outcomes in their formulation of Alternative 6, but only downstream from opaque policy choices and deliberations. Bonneville respectfully requests that the Corps adhere to Congress' direction and perform a collaborative, dam-by-dam examination of a non-power alternative with all stakeholders to achieve a more thorough and useful exploration of potential uneconomic hydropower solutions and less costly passage solutions.

Sincerely,

Rachel Dibble
Executive Vice President
Generation Asset Management

Dorie Welch
Deputy Executive Vice President
Environment, Fish and Wildlife

Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

January 12, 2026

In Reply refer to: PG-5

Liza Wells
U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946 Portland, OR 97208-2946

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Sincerely,

Rachel Dibble
Executive Vice President
Generation Asset Management

Dorie Welch
Deputy Executive Vice President
Environment, Fish and Wildlife

From:	MUCKEN Alyssa M * WRD
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	REIS Kelly E * ODFW; GOLDRICH-MIDDAUGH Grace * DEQ; WOODCOCK Douglas E * WRD; WIGAL Jennifer * DEQ; STAHL Tom * ODFW; SOMMER Maggie * WRD; FERRARI Chandra Alene * GOV; Anne Mullan - NOAA Federal; Hudson, Michael; lawrence.schwabe@grandronde.org; Bangs, Brian L; SPARKS Ryan * OPRD; Panwhar Samina T; Oliver, E A (Liz) CIV (USA)
Subject:	[Non-DoD Source] OWRD, ODEQ, ODFW comments -- USACE Supplemental EIS
Date:	Tuesday, January 13, 2026 4:37:41 PM
Attachments:	2026_01_13_Oregon comments public SEIS_draft.pdf

Hello, attached you'll find comments on the draft Supplemental EIS from ODFW, ODEQ, and OWRD.

Thank you for the opportunity to review the draft SEIS and provide comment.

Kind regards,

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

Department of Environmental Quality
Department of Fish and Wildlife
Water Resources Department

U.S. Army Corps of Engineers
ATTN: CENWP-PME-E / Willamette EIS
PO Box 2946
Portland, OR 97208-2946

January 13, 2026

Submitted electronically to: willamette.eis@usace.army.mil

RE: State of Oregon Cooperating Agency Comments on Willamette Valley System Supplemental EIS

As cooperating agencies, the Oregon Department of Environmental Quality, Oregon Department of Fish and Wildlife, and the Oregon Water Resources Department appreciate the opportunity to review the draft Supplemental Environmental Impact Statement (SEIS), a document intended to address new Biological Opinion and Water Resources Development Act (WRDA) 2024 requirements following the publication of the Willamette Valley EIS in April 2025.

We share the following comments for your consideration. Please consider these comments along with others provided during the cooperating agency review in 2025.

General Comments

Understanding what actions are included in the Preferred Alternative is challenging. We found it difficult to tease apart extended interim actions from the final actions or measures, despite the helpful inclusion of Table 2-2 listing the Interim Operations. Additionally, we have concerns about the duration of interim operations (Appendix N, Fig. 2-3) until long-term solutions are implemented. This extended timeline increases the need for and importance of adequate monitoring and evaluation, and data-informed adaptive management.

We appreciate the incorporation of lessons learned from previous Willamette reservoir deep drawdowns into the planned implementation of the Detroit Reservoir deep drawdown interim operation. Information from monitoring activities and communication and coordination with affected downstream drinking water facilities, year-round water users, and communities will continue to be important throughout the implementation of this interim operation. Figure 3-32 (p. 211) is very helpful for understanding the scale of the Detroit Reservoir deep drawdown compared to that at Green Peter Reservoir.

We recommend that USACE include additional information in the SEIS to clarify planned communication, monitoring, and assessment of the deep drawdown operation. For example, the SEIS should detail, specifically, the types of information collected during the Green Peter and Lookout Point drawdowns that were used to inform the proposed approach to implementation of the Detroit drawdown. The SEIS should also identify what types of data will be collected during the Detroit operation and how data and information will be used to inform adaptive management in future years. We look forward to continuing the collaboration with USACE and other entities to implement the deep drawdown operations while minimizing associated impacts.

Fish Passage Considerations

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.

- The SEIS Preferred Alternative for fish passage at Detroit Dam includes interim operational fish passage via a deep drawdown until a structural solution can be implemented. Any interim and long-term fish passage solution should be evaluated and adaptively managed to ensure effectiveness and to minimize negative effects.
- Alternative 6 includes a new adult upstream fish passage facility at Green Peter Dam (section 2.10.4.10). This section should also reference the NMFS 2024 Biological Opinion Reasonable and Prudent Alternative 4.6.2 which includes an evaluation of separating fish at the Foster Adult Fish Facility for release above Green Peter Dam to reduce fish handling.
- Please include additional text in the main document to explain why Hills Creek Dam Chinook salmon downstream passage survival estimates provided in Table 3-19 (p. 128) are listed as "N/A".

Ceasing Federal Hydropower Operations

Ultimately, we would like USACE to have flexibility for how the Willamette Valley System's dams and reservoirs are managed to provide safe and effective volitional passage and other benefits for fish, to provide a reliable water supply for multiple purposes, and to benefit downstream water quality. The best solution for fish may not preclude 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 and Foster Dam day/night operations).

- In addition to the "all or nothing" approach to ceasing federal hydropower operations (or "deauthorization") in the Willamette basin, a dam-by-dam analysis should be included.
- This analysis should provide information about costs and benefits of deauthorization at each dam (for fish passage, water quality, water supply, flow management flexibility, short-term and long-term project economic costs, etc.).
- This is consistent with WRDA 2022 (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."

[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.

Flow Management & Water Supply

- Given state expertise and water management authority, we continue to request involvement in the development of new flow management objectives required by the 2024 Biological Opinion.
- The SEIS frequently uses an 80 percent exceedance probability to describe reservoir storage (e.g., Tables 3-38 and 3-39 in the main document). It is unclear why this metric was selected; for example, it would be helpful to clarify if USACE intends to utilize this probability for future water supply agreements or whether the goal is to achieve this level of reliability when filling the reservoirs under the preferred alternative.
- Clarify whether the peak stored water amounts listed in Table 3-38 (Ch. 3, p. 197) include storage volumes from the power pool. If not, it would be useful to include an additional column to show available acre-feet of power pool storage that is unique to Alternative 6 for comparison to other alternatives.
- Comparing changes in water supply and storage between the No-Action Alternative, Interim Operations, the preferred Alternative 5, and Alternative 6 is very challenging, especially within the context of this SEIS. The No-Action Alternative includes the 2008 Biological Opinion flow objectives, as does Alternative 5, Alternative 6, and the Interim Operations, making it difficult to pinpoint the reason for changes in overall storage. For example, the document should include the probability of refill and how it may be impacted by an additional deep drawdown operation at Detroit, comparing that probability to other interim operations, and quantify any potential benefits of using the power pool volumes for other authorized purposes.
- Detroit deep drawdown operation – Table 3-1 (p. 72) summarizes hydrologic processes for each alternative and notes that Detroit elevations will be lower in the winter because of the deep drawdown and spring refill "may be impeded in years with exceedingly low inflow in late winter and spring." Expanding upon this general statement with some level of probability of refilling Detroit would be helpful for understanding risks and tradeoffs and would also inform goals and objectives for the Forecast Informed Reservoir Operations project.
- Interim Operations (Appendix J-Water Supply, p. 86) mentions that the delayed refill at Cougar, fish passage operation at Lookout Point, and the 2008 flow targets would affect available stored water. A statement about whether the Detroit deep drawdown would impact storage refill, and to what extent, would be helpful. As an interim operation and focus of this SEIS, one would expect to see a detailed discussion about the Detroit deep drawdown operation in the water supply analysis appendix.
- Irrigation Estimates (Appendix J -Water Supply, p. 7) – the irrigation storage allocation discussion about newly converted instream water rights could be improved by mentioning the uncertainty with this irrigation estimate from the Willamette Basin Review study, which provides estimates of water rights that <u>may</u> be at risk. The study acknowledges the <u>potential</u> for regulation and how supplemental sources may come from other supplies beyond stored water. The SEIS discussion should note these as estimates with some uncertainty and some entities "may need" rather than "would need" a secondary source of water.

Water Quality

- In the Alternative 6 description of the Total Dissolved Gas (TDG) Modeling section (3.5.3.1), the document states, "Alternative 6 does not include specific measures to reduce TDG." Please include a brief explanation of any methods that were considered to reduce substantial projected increases to TDG, along with pros and cons of the different methods.
- Section 2.8.6 – Interim Operations should include additional details regarding monitoring and implementation of deep drawdowns:
    - Include discussion of what chemical and physical sediment characteristics USACE plans to sample, and at what frequency, and discuss any plans to estimate sediment transport rates and volumes during deep drawdowns.
    - The SEIS should describe how operations during the deep drawdown may be altered during different hydrologic conditions (adequate, dry (deficit), and wet (abundant) water years) and the range of impacts of these operations on temperature, turbidity, harmful algal blooms (HABS), and TDG.
    - The SEIS should clarify what factors USACE may consider in determining the timing, duration, and stepwise implementation of the drawdown.
    - The SEIS should include the expected timing (month) and duration of the Detroit drawdown in Table 2-2. It would be helpful if the language and timing descriptions for all deep drawdown operations were consistent across reservoirs. Currently, different information is presented for Green Peter, Lookout Point, Detroit, and Cougar reservoirs.
- Section 7.2.2 – Effects of Detroit Drawdown should reference USACE plans to coordinate with state agencies and downstream drinking water providers during the implementation of the drawdown.
- Section 3.19.4.1 – Turbidity should describe the data that will be collected to assess potential impacts of the deep drawdown.
- Appendix C mentions that there are no new hydraulic or sediment models run as a part of this analysis (Section 1.2 Analysis Metrics Summary, Page C-1-3). Are any additional sediment transport models being developed that would inform interim or long-term operations?
- Appendix C should include a written synthesis of the qualitative and quantitative metrics for sediment mobilization and transport, at a minimum comparing resulting values for the Preferred Alternative and Interim Operations to the No-Action Alternative. This synthesis should clarify how these analyses informed selection of a preferred alternative and elaborate on the potential expected impacts of different operations which are currently only presented in tables in this appendix.
- Dam modifications associated with deauthorization of hydropower and interim operations including deep drawdowns may affect mercury dynamics. The SEIS should include specific actions to assess the effects of operations and predict how they might be adaptively managed to reduce methylmercury production and bioaccumulation. Included strategies should align with the 2019 Willamette Mercury Water Quality Management Plan (WQMP) and should be implemented to meet assigned load allocations through control of existing sources of pollution or to offset predicted additional loading due to changes in operations and maintenance.

- Proposed changes to structures and operations in Alternative 6 and the interim operations should compare potential temperature impacts to the 2024 Willamette Subbasins Temperature Replacement Total Maximum Daily Load (TMDL) load allocations.
- Table 3-8 (Section 3.5.3.1) – Please describe what being within 2 degrees F of the temperature target is intended to represent. Is there a justification for this metric that could be described and/or cited?
- Table 3-9 (Section 3.5.3.1) – This section heading is "Summer Extremes", but Table 3-9 provides yearly output. The table would be more informative and interpretable if it only included the summer months, where the temperature could potentially be exceeded.

Angling

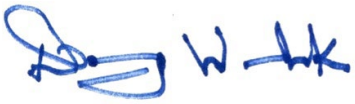
- Definitive statements regarding the effects of ODFW's kokanee releases into reservoirs are not warranted. Please change:
    - "…in Detroit reservoir would mitigate…" to "may mitigate." (Section 7.2.2, pg. ES-10)
    - "Releases of hatchery rainbow trout and kokanee would help maintain sport fishing opportunities…" to "Releases of hatchery rainbow trout and kokanee may help maintain sport fishing opportunities…". (Section 3.8.3.2, p. 132)
    - "…in Detroit reservoir will mitigate…" to "might mitigate." (Section 3.8.4.1, p. 135)
    - "Adverse effects…moderated….stocking of rainbow trout and kokanee…". Remove the word kokanee. We do not know whether stocking efforts will be successful or sustained. (Section 3.8.6, Table 3-24, p. 152. NAA column and Alternative 2A column)
    - "Adverse effects…moderated….stocking of rainbow trout and kokanee…". Remove the word kokanee. We do not know whether stocking efforts will be successful or sustained. (Section 3.8.6, Table 3-24, p. 155. NAA column)
    - "…in Detroit reservoir will mitigate…" to "might mitigate." (Section 3.11.4, p. 179)
    - "Future stocking…in Detroit reservoir would mitigate…" to "may mitigate." (Section 3.14.4, p. 203 last sentence in last paragraph).
- Table 6-1 (Appendix E, Section 6.3.1, starting on p. E2-6-4) lacks the formatting of the original table cited in the HGMP which designates the waterbodies that do not include ESA-listed fish. Please update this table to clarify which waterbodies do not include ESA-listed fish.
- Appendix E, Section 6.3.2 Kokanee (starting on p. E2-6-6) should be updated to reflect that at least some kokanee that survived the Green Peter Reservoir deep drawdown returned as sockeye salmon in 2025. Following disease testing, ODFW transported some returning sockeye salmon above Green Peter Reservoir.
- Appendix E, p. E2-6-7. Kokanee are not present in Lookout Point Reservoir. Remove "Lookout Point Reservoir" from the last sentence of the second to last paragraph on this page.
- Chapter 3, p. 130 and Appendix E, Chapter 8 – consider updating to reflect recent Pacific lamprey releases above USACE WVS dams.

The success of the actions identified in both the Final EIS and this SEIS will depend on the appropriate research, monitoring, evaluation (RME) and resulting adaptive management of these actions to benefit multiple authorized purposes. We request a role in determining and prioritizing RME associated with the implementation of the EIS and SEIS, and input into decisions affecting adaptive management.

As cooperating agencies, we encourage USACE to coordinate with other state natural resource agencies, specifically, the Oregon Parks and Recreation Department, Oregon State Marine Board, and the Oregon Health Authority. These agencies manage state-owned facilities that may be impacted by operational changes at Detroit or may be aware of potential impacts to boating, recreation, and drinking water systems downstream.

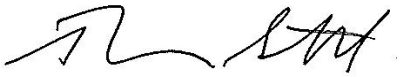
Thank you again for the opportunity to comment. We look forward to working with USACE and other partners to finalize the supplemental EIS and implement the preferred alternative. If you have any questions, please feel free to contact our WATER Steering Team representatives.

Kind regards,



Doug Woodcock
Deputy Director
Water Resources Dept.

Jennifer Wigal
Water Quality Administrator
Dept. of Environmental Quality



Tom Stahl
Deputy Administrator for Inland Fish
Dept. of Fish and Wildlife

From:	Denver Pugh
To:	CENWP-PME-Williamette-Valley-System-EIS
Subject:	[Non-DoD Source] Detroit Dam Draft SEIS Comments
Date:	Tuesday, January 13, 2026 4:33:25 PM
Attachments:	011326 Detroit Drawdown.pdf

Denver Pugh
President Linn County Farm Bureau
denverpugh@yahoo.com
541-979-3435

January 13, 2026

U.S. Army Corps of Engineers (USACE)
Portland District
P.O. Box 2946
Attn: CENWP-PME-E / Willamette EIS
Portland, OR 97208-2946

Re: Detroit Dam Draft Supplemental Environmental Impact Statement (Nov. 2025)

Dear Ms. Oliver:

Linn County Farm Bureau represents over 450 members who are farmers, ranchers, and agriculture supporters in Linn County. We appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement for the continued operations and maintenance of the Willamette Valley System, namely the late fall/early winter deep drawdown of Detroit Reservoir.

We are very concerned the focus for the this drawdown is hyper focused on the wildlife preservation to facilitate juvenile fish passage and not for the preservation of water for agricultural use, fire suppression, or for securing reliable drinking water for many downstream.

We feel there needs to be a larger scientific based study that takes into account the economic impact for the loss of acre feet of irrigation water in relation to yield loss due to the lack of water for irrigation. How the drawdown will effect the people relying on that water to filter down to the aquifers that fill many private wells. Research on how having much lower levels impacts the ability to suppress wildfires in the summer. As well as how this drawdown will effect the fish species currently residing in Detroit Reservoir.

There are too many communities that reside downstream who rely on these waters and we urge the U.S. Army Corps of Engineers to take a step back and reconsider the assumptions made from the Draft Supplemental Environmental Impact Statement of Detroit Reservoir. Reengage with the stakeholder communities and come up with a better solution that all can benefit from.

Thank you for the opportunity to provide comment on this matter.

Sincerely,

Denver Pugh
Linn County Farm Bureau President

From:	Dibble,Rachel L (BPA) - PT-5
To:	CENWP-PME-Williamette-Valley-System-EIS; Wells, Elizabeth R CIV USARMY CENWP (USA)
Cc:	Dickerson, Peter D CIV USARMY CENWD (USA); Thompson, Bradley E CIV USARMY CENWD (USA); Welch,Dorothy W (BPA) - E-4; Kintz,Jesse H (BPA) - PG-5; Jeff Maslow
Subject:	[Non-DoD Source] Willamette Valley System Supplemental EIS Comments
Date:	Tuesday, January 13, 2026 4:27:55 PM
Attachments:	BPA Public Comment Letter to Corps on Willamette Supplemental EIS.pdf

Dear Ms. Wells,

Attached, please find Bonneville's comments on the Willamette Valley System Supplemental Environmental Impact Statement.

Thank you.

Rachel Dibble
BONNEVILLE POWER ADMINISTRATION
DEPARTMENT OF ENERGY
Vice President | Power | Generation Asset Management
rldibble@bpa.gov | O: 360-619-6191 | C: 971-207-2243

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

From:	Hudson, Michael
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Covington, Scott; Everett, Jeff; Bangs, Brian L
Subject:	[Non-DoD Source] USFWS Comments on USACE 2025 WVS Operations and Maintenance dSEIS
Date:	Tuesday, January 13, 2026 4:00:16 PM
Attachments:	USFWSComments_WVP_DraftSEIS_20260113.pdf

To whom it may concern,

Please find the attached subject document. Thank you for the opportunity to provide comment. Please confirm receipt.

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

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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

January 13, 2026

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 on January 13, 2026

Subject: U.S. Fish and Wildlife Service (USFWS) Comments on the U.S. Army Corps of Engineers (USACE) 2025 Willamette Valley System (WVS) Operations and Maintenance Draft Supplemental Environmental Impact Statement (dSEIS)

To whom it may concern:

The USFWS has reviewed sections of the dSEIS for the WVS Operations and Maintenance (dated November 2025) as they pertain to authorities and responsibilities of the USFWS. We provide general and specific comments on the following pages.

Thank you for the opportunity to provide these comments. If you have any questions, please contact Michael Hudson (michael_hudson@fws.gov). We look forward to continuing to work with you in the Willamette River basin.

Sincerely,

Scott Covington
Project Leader

GENERAL

The USFWS remains concerned that the measures and alternatives considered, included and analyzed were unnecessarily constrained; limiting the scope of potential opportunities to improve fish passage conditions at specific dams while still meeting the authorized purposes of those projects. We provided this feedback to USACE in USFWS Comments on Willamette Valley Operations and Maintenance SEIS Scoping dated June 6, 2025. The statements, "Though downstream fish passage conditions are similar to Alternative 5, downstream passage survival would be negatively impacted due to the installation of cone-valves and in-line orifices which have more adverse effects on fish than turbines. Fish would also experience higher total dissolved gas due to installation of energy dissipation devices in the penstocks," are great examples of why additional measures to improve fish passage should be considered, included and analyzed in this SEIS (Sec. 5.1.9.9, p. 252). The end of hydropower production cannot be done in a vacuum without consideration for and taking necessary actions to maintain the other authorized purposes of the dams. To do so, without considering those authorized purposes, may not allow this alternative to be feasible.

- We recommend that USACE recognize this shortcoming of the SEIS if additional measures are not considered, included and analyzed.

The USFWS remains significantly concerned with the Implementation Timeline (Appendix N, Chapter 2) as we stated in USFWS Comments on the USACE 2022 Willamette Valley System Operations and Maintenance Draft Programmatic Environmental Impact Statement (dPEIS) dated February 21, 2023. Planned construction of fish passage solutions needed immediately are spread across the next 20 years; and that may be a best-case scenario.

Fish need both upstream and downstream passage solutions at all Federal projects. Providing upstream and downstream passage at projects provides the opportunity for bull trout and other species to reduce the risk from local threats that may be present both upstream and downstream of the project through connectivity that allows individuals to move away from the threat. This is the solution that provides the most flexibility for bull trout and other species.

The USFWS appreciates the USACE support in completing a Fish and Wildlife Coordination Act Report (FWCAR) in included in Appendix Q. This report analyzes the impacts and benefits of the alternatives presented in the final EIS to the broader ecosystem species and habitats. This information should prove useful to management of the WVS going forward. Appendix Q was missing from the report available for public review. We expect it, inclusive of the USFWS FWCAR, to be a part of the final SEIS.

COMMENTS ON AUTHORIZED PURPOSES

Throughout the dSEIS, the general statement is made that Congress authorized eight purposes for the WVS. While this is true, the statement suggests that all purposes are for all dams. According to "Authorized and Operating Purposes of Corps of Engineers Reservoirs" (USACE

1992), there are multiple and varying purposes for each dam. This should be transparent to best understand and creatively develop all current and future alternative solutions for operation and maintenance of the WVS in accordance with the authorized purposes.

- We recommend reference to this report be included and a table or Appendix that lists authorized purposes for each dam.

Big Cliff Dam has just two operating and authorized purposes: Hydroelectric power and reregulation under the authorizing law PL-80-858. Dexter has those two same operating and authorized purposes under authorizing law PL-81-516 in addition to recreation under authorizing law PL 78-534. With deauthorization of hydropower at these projects, the authorities for those projects are eliminated or greatly reduced.

- It is important to be transparent that these are not flood control structures and to provide the potential for a greater variety of actions should the authority for hydropower be eliminated.

Dam removal example of 'alternatives considered but eliminated from further review' due to existing authorities may not be the best example anymore (Sec 2.9, p. 20). A dam removal measure could be coupled with the new measures in Alternative 6 under the same interpretation of the WRDA 24 language.

- Consider another example of an alternative considered but eliminated from further review.
- Reconsider all measures previously eliminated due to hydropower authority and integrate those into the current analyses. If they are not integrated, provide rationale that is measure specific and transparent as to why they are not included in the SEIS analyses.
- As part of our request that USACE consider other alternatives, we ask for an assessment of alternate Cougar Dam operations to enhance fish passage. Utilization 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, would help provide safer, year-round downstream passage. We recognize this will also lead to deauthorization of other purposes (other than flood risk management), and recommend further analysis be included in the final SEIS.

There is an inherent environmental impact that accompanies the existence of a dam. That should be addressed in an EIS when the need for that dam ceases.

- We recommend that language be included in the SEIS that recognizes the existing environmental impact of these two projects (Big Cliff and Dexter) specifically and the need that no longer exists if hydropower is removed from the WVS.

COMMENTS ON SECTIONS INCORPORATED BY REFERENCE

We understand the rationale for incorporating information from the Final EIS (FEIS) by reference. The absence of those sections are confusing when no direction is provided on where that information can be found. In some cases, the information in the parallel section of the FEIS has been moved to an appendix. For example, Sections 5.3 and 5.4 have been incorporated by reference in the dSEIS. Chapter 5 of the FEIS references Appendix A of the FEIS. The information in those specific sections, however, can be found in Appendix N of both the FEIS and the dSEIS.

- We recommend that reference be provided to specific locations in the FEIS and SEIS where the information can be found.

Section 1.10 has been 'Incorporated by reference.' The approach to this section should be reconsidered. In the FEIS, USACE did not consider potential alternatives or measures inconsistent with the purpose and need for the Proposed Action, meaning measures could not prevent or eliminate operations for any authorized purpose and needed to improve conditions for ESA listed species. However, WRDA 24 requires USACE to evaluate a new alternative that ceases Federal hydropower operations. Therefore, we need a clear understanding of what projects are authorized for what purposes.

- We recommend reference to USACE 1992 and a table in this section or Appendix be included that lists authorized purposes for each dam.
- Section 1.11.2.2 discusses operational considerations for hydropower at each project. This would be another place to reference the limited authorized purposes for a few of these projects (e.g., Big Cliff and Dexter).

COMMENTS ON CLIMATE CHANGE

Climate change analyses include no reference to species' climate change vulnerability assessments for bull trout (Dunham 2015) or Pacific lamprey (Wang et al. 2020). An adequate assessment of climate impacts on species addressed in the EIS is challenging without referencing information available from existing climate change vulnerability assessments.

Given the qualitative nature of the climate change assessment, this statement is rather definitive: "The EIS actions will not exacerbate climate change impact or adversely affect the WVS and its environment." The summary and conclusions do a good job qualifying the relationships between climate change, the EIS actions and related uncertainty. This statement should also be qualified by framing it relative to uncertainty and the NAA.

COMMENTS ON BULL TROUT

The USFWS maintains that bull trout in the Willamette Basin are adfluvial only because they are not afforded passage, and this forced adfluvial life history does not benefit the recovery of bull trout in the Willamette Basin. This comment was provided previously.

- We recommend that the sentence in Appendix E, middle of p. E1-3-1, “Currently local bull trout populations above WVS dams primarily exhibit an adfluvial life history, relying on reservoirs for rearing and forage,” be amended to read, “Currently local bull trout populations above WVS dams primarily exhibit an adfluvial life history, ***using*** reservoirs for rearing and forage.”

The USFWS also maintains that restoration of passage within the Middle Fork Willamette and the McKenzie Basins is critical to bull trout and that the benefits of safe and effective passage outweigh the stated risks (i.e., increased exposure to recreational fisheries and predatory fish, loss of reservoir habitat, exposure to warmer habitats below dams). Providing and maintaining connectivity is one of the more important climate adaptation actions that can be taken (e.g., https://www.sciencedirect.com/science/article/pii/S0006320720307369 (and references within)).

In Section 3.8.3.2, p. 130, we have concern with the statement in first paragraph, "Few Bull trout are expected to move downstream due to warmer water temperature conditions…." We are unsure how many bull trout may move downstream. Timing of movement downstream to Lookout Point may vary by time of year and life stage. Any bull trout that move through Hills Creek dam may move downstream in fall or winter (when temperatures are cooler) and return upstream in spring and summer.

- We recommend the sentence be changed to, "Any bull trout that move downstream through Hills Creek Dam to Lookout Point Dam will be collected using a floating screen structure and either passed downstream of Dexter Dam or back upstream as directed by State and Federal fish managers."

In Section 5.1.9.6, p. 249, it is unclear why there would be no habitat gains for bull trout. Alternative 3A indicates that there would be habitat gains for bull trout. With Alternative 3B and deep drawdowns at Cougar (using the diversion tunnel) and Hills Creek, it seems that there should be at least the same habitat gains as Alternative 3A.

- We recommend clarifying/correcting the language.

In Section 5.1.9.6, p. 250, there is too much emphasis on the negative effects of access to below-dam habitat for bull trout. There is considerable nuance to the statement regarding increased demographic risks to bull trout from providing passage downstream of dams. For example, emphasis is put on the risks especially below Hills Creek Dam. That is true in some cases and places. However, providing that passage downstream also provides access for bull trout into a lot of other tributaries that do not have any greater human disturbance in upper reaches than Hills Creek above the dam (e.g., Salt Creek, Salmon Creek, NF Middle Fork Willamette). There is a balance in management actions that could be emphasized more in this section.

- We recommend softening the language and expanding on balance here and elsewhere regarding bull trout response to management actions.

COMMENTS ON PACIFIC LAMPREY

Pacific lamprey are both culturally and ecologically important. Lamprey are a Tribal Trust species and have a high cultural significance to Native American tribes throughout the Columbia River Basin. Currently, Pacific lamprey are extirpated above the WVS dams, with the exception of Fall Creek Dam (which is discussed later). Consideration of Pacific lamprey passage at the WVS is important because their abundance and distribution has significantly declined throughout its range over the past three decades, and efforts to reverse this decline are needed (USFWS 2019; ODFW 2020). ODFW, in its Coastal, Columbia, and Snake Conservation Plan for Lampreys in Oregon (ODFW 2020, p. 35, 38) identified habitat access (up- and downstream passage) as a primary limiting factor in the Willamette Basin, identifying the 13 dams of the WVS.

Lampreys likely provide substantial benefits to ecosystem health and water quality on which ESA-listed fish rely. Lamprey have been documented as prey by many different animal species, including 20 species of fish (both native and non-native), 11 species of birds, and 9 marine mammals (ODFW, 2020, p.119; Table A3.4). Because the caloric content of Pacific Lamprey is significantly higher than salmon (Close et al. 2002; Clemens et al. 2019 as cited in ODFW 2020), lampreys may serve as important "predation buffers" for ESA-listed salmonids and distract predators away from feeding upon salmon at times. ODFW (2020, p. 116) summarized ecological benefits into three categories:

1) 'ecosystem engineers;'

2) nutrient suppliers to freshwater ecosystems and recyclers of nutrients within these systems; and

3) prey sources for other animals / predation buffers to salmonid species."

ODFW, in its Coastal, Columbia, and Snake Conservation Plan for Lampreys in Oregon (ODFW 2020, p. 116) further describes these categories as follows:

"As 'ecosystem engineers' lampreys benefit the surrounding habitat in freshwater streams in ways that differ by life stage. For example, as adults, lampreys construct redds in which they spawn. Construction of these redds alters the streambed in ways that favor aggregations of aquatic insects that process stream nutrients and feed juvenile fishes (Hogg et al. 2014). In addition, the burrowing behavior of larval lamprey has been associated with increased water exchange between the stream and substrate in the streambed, increased oxygen in the substrate, and an increase in fine particulate matter on the surface of the substrate (Shirakawa et al. 2013; Boeker and Geist 2016).

"Anadromous lampreys provide marine-derived nutrients to freshwater ecosystems (Close et al. 2002; Nislow and Kynard 2009). Their spawned-out carcasses decay and release nutrients into the surrounding water (Weaver et al. 2015). These nutrients are assimilated by aquatic insects (Weaver et al. 2016), which may be consumed by juvenile salmonids. As nutrient recyclers, larval lamprey feed on detritus and algae and convert these food sources into energy stored as animal (larval lamprey) tissue (Close et al. 2002) that is then available to larger predators that eat them. Lampreys are a prey source for humans (see below) and many different animals (Table A3.4).

"Larval and juvenile lampreys migrating downstream may focus the attention of predatory fishes and birds, thereby potentially offering a predation reprieve for juvenile salmon and steelhead. Similarly, the high caloric content, ease of capture (relative to salmonids), and the tendency to migrate in schools may make Pacific Lamprey desirable prey sources for pinnipeds, thereby buffering adult salmon and steelhead from predation (Close et al. 2002)."

In the USFWS Fish and Wildlife Coordination Act Report, developed for the USACE's use in this EIS, the USFWS included Recommendations for Pacific lamprey passage, including

1) Complete an upstream lamprey trap and haul for passage Fall Creek Dam to sustain the recently reintroduced population of Pacific lamprey, and

2) Create and implement a prioritization framework for Pacific lamprey conservation and reintroduction of lamprey into historical habitats above the USACE dams in collaboration with the USFWS and other partners in the Willamette Basin, aka the WVS Lamprey Passage Plan.

USFWS believes these two items are important commitments the USACE should include in its proposed action, which covers the WVS for the next 30 years. The current preferred alternative only indicates that lamprey passage features (not effective passage) would occur at the Green Peter Dam upstream passage facility. There continues to be no mention of completing passage at Fall Creek Dam, despite effective passage is needed at Fall Creek within five years to maintain the successful reintroduction of Pacific lamprey above Fall Creek Dam.

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. 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. We recognized that this will also lead to deauthorization of other purposes (other than flood risk management), and hope that would be part of the final SEIS.

Despite the purpose and need of the proposed action is to provide fish passage for the next 30 years and specifically names Pacific lamprey, none of the alternatives results in passage at any of the 13 WVS dams. A commitment by the USACE to collaboratively develop a WVS Lamprey

Passage Plan is needed within the proposed action to address the lack of access to historical habitats for over 60 years and benefit this species in decline.

OTHER COMMENTS

In the Executive Summary, Section 7.2.2, p. ES-10, the last paragraph of 'Effects of Detroit Drawdown' on top of page speaks to the adverse effects to sport fishing but does not explicitly discuss the same effects on native resident fish. Adverse effects to sportfishing due to changes in the reservoir habitat conditions and food availability affecting growth and survival are stated. But this is not explicitly state for native resident fish not part of the sportfish community (e.g., suckers). Increased entrainment is recognized, but not other effects.

- We recommend including language addressing native resident fish impacts due to changes in reservoir conditions here and elsewhere in the document.

There is confusing and/or conflicting language in the second and third paragraphs of the introduction regarding criteria for supplementation in Section 2.1 on page 12. The second paragraph states that the criteria for supplementation have not been met. The third paragraph indicates that supplementing the FEIS would be in furtherance of NEPA, which according to paragraph two is a criterion for supplementation.

- We recommend clarifying this language.

Chapters 3 and 4 of Appendix E are not updated to incorporate analysis for Alternative 6.

- We recommend adding analysis or reference to Alternative 6 and the existing analyses that are surrogates for that alternative.

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From:	Brent Stevenson
To:	CENWP-PME-Williamette-Valley-System-EIS
Subject:	[Non-DoD Source] Official Comments Included
Date:	Tuesday, January 13, 2026 3:08:01 PM
Attachments:	SWCD_SEIS_Comment_Letter_Final submitted.docx

Dear CENWP-PME-Williamette-Valley-System-EIS Team,

Please be advised that the official comments have been included as requested. If you need any additional information or clarification, feel free to reach out.

Thank you for your attention to this matter.

Regards,

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
Santiamwater.gov

Date: January 13, 2026

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

RE: Comments on the Willamette Valley System Supplemental Environmental Impact Statement (SEIS)

Dear Project Team,

Executive Summary

SWCD appreciates the opportunity to comment on the SEIS. Our position is clear: irrigation remains the primary purpose of Bureau of Reclamation water rights in the North Santiam Basin. While we recognize the need for narrowly tailored measures to comply with ESA requirements, we strongly oppose broad or permanent reallocation of irrigation water for other uses. The SEIS must address critical gaps in modeling, legal compliance, and operational planning. Failure to do so risks violations of NEPA's hard look requirement (42 U.S.C. § 4332(2)(C)), arbitrary and capricious decision-making under the APA (5 U.S.C. § 706(2)(A)), and potential ESA non-compliance. Key concerns include reservoir refill uncertainty, climate resilience, water quality risks, coordination failures, equity in allocation, and USBR's lack of leadership on irrigation impacts. Importantly, maintaining a moratorium on new agricultural irrigation contracts while holding water in Detroit Reservoir for recreational purposes is inequitable and contrary to BOR's irrigation mission. This inequity could result in thousands of acre-feet of water being withheld from agricultural use annually, causing severe economic harm to the District as well as regional producers. These issues have significant economic consequences for agriculture and municipal supply and expose agencies to litigation risk if not resolved.

Introduction

On behalf of the Santiam Water Control District (SWCD), thank you for the opportunity to provide comments on the Supplemental Environmental Impact Statement (SEIS) for the Willamette Valley System. SWCD manages critical water rights and infrastructure serving agricultural producers, municipal partners, and environmental stakeholders in the North Santiam Basin. Our operations include delivery of raw water to the City of Stayton and management of irrigation water including Bureau of Reclamation (BOR) contract water. The proposed operational changes outlined in the SEIS have significant implications for water reliability, municipal supply, agricultural productivity, and ecological objectives. These comments build upon our prior submissions and incorporate new considerations introduced in the SEIS. Our intent is to ensure the Final SEIS fully addresses operational, contractual, and environmental consequences of proposed alternatives, consistent with NEPA (42 U.S.C. § 4332), ESA (16 U.S.C. § 1536), Oregon water law, and federal reclamation law.

I. Carry-Forward Comments from Previous EIS Submission

1. Contract Holder Protections: Existing contract holders must be grandfathered and protected from disproportionate reductions. All new contracts should utilize a proportionate reduction system during shortages (Draft SEIS, Section 3-1004). Preference should be given to existing users and ESA needs before new uses are contemplated to align with Oregon water law.

2. Water Rights and Storage: The SEIS should provide a tabulation of storage amounts and releases per reservoir and use (Draft SEIS, Appendix N). Clarify potential conflicts with Oregon water law and priority dates to prevent litigation risk.

3. Biological Opinions (BiOps): Explain the relationship among the 2008, 2019, and forthcoming BiOps and clarify the moratorium on new irrigation contracts in the Santiam Basin (Draft SEIS, Section 3-1033). Failure to reconcile these obligations creates uncertainty and potential ESA compliance issues.

4. Water Management Framework: Develop an adaptive management plan that balances ESA flow targets with other objectives (Draft SEIS, Appendix N). Outline proportionate reduction strategies for future contracts to ensure fairness and compliance. Resolve current US BOR contract language with SEIS and EIS operational concepts.

5. Modeling and Data Accuracy: Use current datasets such as the 2020 Modified Flow Dataset (Draft SEIS, Section 2.3.3). Clearly state assumptions and correct inaccuracies,

including evaporation embedded in inflow calculations, which could misrepresent available storage.

6. Impact Analysis: Conduct reservoir-specific analysis rather than system-wide only (Draft SEIS, Section 3-1033). Quantify ESA flow needs at the tributary level to avoid masking major localized impacts.

II. New Concerns Specific to the Supplemental EIS

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 storage 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. The release of flows in the fall could affect two separate water years (pre and post Oct 1) and therefore storage allocations, releases and water right compliance should be clarified.

Equity in Allocation

The SEIS does not clearly define prioritization during shortages (Draft SEIS, Section 3-1004). Proportionate reduction strategies across user types are necessary to ensure fairness and compliance with Oregon water law. Maintaining a moratorium on new agricultural irrigation contracts while continuing to store water in Detroit Reservoir primarily for recreational purposes is inequitable and contrary to BOR's irrigation mission. This practice fails to meet NEPA's requirement for a balanced evaluation of alternatives and consideration of socioeconomic impacts. Allocation decisions should prioritize irrigation and ESA compliance over discretionary uses such as recreation, consistent with NEPA's requirement for balanced evaluation of alternatives.

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.

USBR Accountability

USBR holds statutory obligations under the Reclamation Act (43 U.S.C. § 371 et seq.) to protect irrigation users, yet the EIS and SEIS demonstrates inadequate involvement by USBR in analyzing irrigation impacts. Responsibility is delegated to USACE, whose primary mission does not include irrigation economics or water rights administration (Draft SEIS, Appendix N). This creates a regulatory gap and potential legal liability for USBR under NEPA and the APA (5 U.S.C. § 706(2)(A)), as foreseeable impacts to irrigation users have not been analyzed. Furthermore, USBR's failure to address the Corps' practice of holding water for recreation while restricting agricultural expansion exacerbates inequities and undermines federal reclamation objectives. This policy choice, if left uncorrected, may constitute arbitrary and capricious action under APA standards and expose agencies to litigation risk for failing to consider reasonable alternatives that protect irrigation interests.

BOR Water Rights and ESA Compliance: The Bureau of Reclamation water rights held in the North Santiam Basin were established for irrigation purposes under federal reclamation law. SWCD does not support broad or permanent reallocation of these irrigation rights for other uses, as doing so would undermine the original purpose and reduce reliability for agricultural users who depend on these allocations for crop production and economic stability. The District is particularly concerned with adding or including operations that require stored water and would trigger a shared reduction related to our current contract language. However, SWCD recognizes that limited, temporary adjustments may be necessary to meet legal compliance obligations under the Endangered Species Act (ESA). Any such measures should be narrowly tailored, science-based, and transparent, with clear mitigation strategies to minimize adverse impacts on irrigation deliveries. USBR must lead this analysis and coordination, as delegating responsibility to USACE—whose mission does not include irrigation economics or water rights administration—creates a regulatory gap and exposes both agencies to potential legal liability under NEPA and the Administrative Procedure Act for failing to adequately analyze foreseeable impacts to irrigation users.

SWCD commends the Corps for its efforts in preparing the SEIS and appreciates the opportunity to provide input. We request that the Final SEIS incorporate tributary-specific modeling and updated climate data, provide comprehensive analysis of contractual obligations and mitigation strategies, address water quality risks and outline robust contingency planning, ensure transparent communication and equitable water management, and engage USBR in a leadership role to avoid regulatory gaps and legal exposure. SWCD reserves all rights under NEPA, ESA, and APA to ensure compliance with applicable laws and regulations. Please contact our office at [phone/email] for any clarification or further discussion.

Respectfully submitted,

Brent Stevenson

Brent Stevenson
District Manager
Santiam Water Control District

From: Sean Ford
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] PPC Draft SEIS Comments
Date: Tuesday, January 13, 2026 1:50:30 PM
Attachments: PPC Draft SEIS Comments 1-13-26.pdf

Hi Liza,

Please see PPC's attached comments on the WVS Draft SEIS.

Sean

Sean Ford
Energy Policy Analyst
Public Power Council
650 NE Holladay Street, Suite 810
Portland, OR 97232
(503) 595-9778
sford@ppcpdx.org

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Portland, OR 97232
(503) 595-9770
www.ppcpdx.org

January 13, 2026

Liza Wells
Deputy District Engineer for Programs and Project Management
Portland District, U.S. Army Corps of Engineers

Submitted electronically

RE: PPC Comments on the Willamette Valley System Operations and Maintenance: Draft Supplemental Environmental Impact Statement

The Public Power Council (PPC) appreciates this opportunity to provide comments on the U.S. Army Corps of Engineers' (Corps) Draft Supplemental Environmental Impact Statement (Draft SEIS) for the operations and maintenance of the Willamette Valley System. PPC is the trade association representing the broadest diversity of Northwest public power utilities with preference rights to purchase wholesale power and transmission services from the Bonneville Power Administration (BPA).

Collectively, our members purchase 90% of the power generated at the multipurpose dams of the Federal Columbia River Power System (FCRPS), including those operated by the Corps. PPC members repay in full and with interest the vast majority the costs associated with the generation and delivery of hydropower, including joint costs assigned to the power function. Our members rely on these services to provide a reliable, economic, and environmentally responsible power supply to the communities and businesses they serve – at cost. This includes final "take or pay" responsibility for costs of the power system operations and maintenance of the Willamette Valley System. As such, remedying the strained economics of hydropower at the Willamette Valley System is vital to the long-term affordability of our members' power supply.

Background

PPC understands that the Corps has entered into an expedited SEIS process – publishing both a Notice of Intent to prepare an SEIS on May 16, 2025 and a Draft SEIS on November 14, 2025 – with the goal of satisfying legal obligations that were not met by

the original EIS released April 11, 2025. Within this context, PPC offers the following comments on the draft SEIS with goal of motivating the Corps to rethink its alternative development prior to finalization.

PPC is disappointed that the Corps chose not to seek input from affected stakeholders and Cooperating Agencies in scoping Alternative 6. A transparent and inclusive region-wide, dam-by-dam review remains the most likely path to achieving fast, cost-effective safe passage for ESA-listed fish. Congress and regional stakeholders intended for Section 1326 of WRDA 2024 to prompt that review. Unfortunately, in developing Alternative 6, the Corps unilaterally narrowed the scope of non-hydropower alternative analyses to a single "full deauthorization" scenario that reconfigures penstocks, removes turbines and adds cone valves while retaining costly fish passage and water quality structures previously included in the Preferred Alternative. This path is both cost prohibitive and generally associated with worse outcomes for downstream water quality and fish mortality.

All told, the Corps is forecasting Alternative 6 to cost $2.5 billion in incremental capital and $48 million in incremental annual O&M, with their own high-end estimates placing those same components at $3.7 billion and $63 million. Depreciated over 30 years, the cost impact on BPA's wholesale power rate would be 3-4.5%, a huge increase considering the Willamette Valley System generates less than 1.5% of BPA's firm energy and considering there are other mounting cost pressures across the FCRPS. Notably, these estimates for proposed Willamette upgrades do not account for inflation and many of the large capital projects in MO6 are the sort of bespoke, experimental projects that have experienced major cost overruns in the past. Adding to our concern, for these capital projects to meet ESA requirements they also need to function properly, and the custom-built and unproven nature of many of the proposed projects exposes ratepayers to additional cost risks should these projects fail to achieve their intended biological benefit.

PPC encourages the Corps to evaluate non-hydropower alternatives that keep the turbines in place and allow for reclassification of the power function as incidental to all other authorized purposes. BPA has identified this step as critical to the long-term financial health of the FCRPS system while also ensuring timely, cost-effective compliance with the ESA.

In its current form, PPC is staunchly opposed to moving forward with detailed evaluation of Alternative 6 until a feasible non-hydropower alternative is developed. Additionally, PPC calls on the Corps to meet the still-outstanding deliverables from WRDA 2022 to complete disposition studies. PPC stands ready to work as a partner to resolve the grave

economic challenges faced by these projects in a manner that provides the best value for the communities and businesses served by public power, fish and wildlife, and the crucial flood control purposes of the Willamette Valley System.

Regards,

Scott Simms
CEO & Executive Director
Public Power Council

From:	Ryan Krabill
To:	CENWP-PME-Williamette-Valley-System-EIS
Subject:	[Non-DoD Source] CENWP-PME-E / Willamette EIS
Date:	Tuesday, January 13, 2026 11:46:41 AM
Attachments:	Outlook-Logo, comp.png OFB Comments on Detroit Dam_010826.pdf

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Please see the attached comments from the Oregon Farm Bureau in response to the Draft SEIS for the Detroit Dam in the Willamette Valley System.

Thank you,

Ryan J. Krabill

Government Affairs

(541) 414-5699

OFB Website | Join OFB today!

January 13, 2026

U.S. Army Corps of Engineers (USACE)
Portland District
P.O. Box 2946
Attn: CENWP-PME-E / Willamette EIS
Portland, OR 97208-2946

Submitted via email to: willamette.eis@usace.army.mil

Re: Detroit Dam Draft Supplemental Environmental Impact Statement (November 2025)

Dear Ms. Oliver:

On behalf of the Oregon Farm Bureau (OFB), Oregon's largest general agricultural organization representing farmers, ranchers, and rural communities statewide, we appreciate the opportunity to submit comments on the Draft Supplemental Environmental Impact Statement (SEIS) for continued operations and maintenance of the Willamette Valley System (WVS).

These comments build upon and reaffirm OFB's prior submissions during the six-year NEPA review that culminated in the April 2025 Final Environmental Impact Statement (FEIS), as well as OFB's June 2025 comments submitted in response to the Notice of the forthcoming SEIS. While we recognize the limited scope of the SEIS, the proposed actions—particularly the analysis of ceasing federal hydropower operations and the late fall/early winter deep drawdown of Detroit Reservoir—raise serious, unresolved concerns for agricultural producers, municipal water systems, rural communities, public health, and energy reliability across the Willamette Valley and Santiam Canyon.

Continued Concerns Regarding Hydropower Elimination
As stated previously, OFB remains deeply concerned by the analysis of an alternative that would cease federal hydropower operations at Willamette Valley dams. Hydropower in the basin provides clean, renewable, dispatchable electricity that supports rural energy

reliability, emergency response capacity, and grid resilience—particularly during wildfire events and major outages when islanding capability is critical for isolated communities.

The Draft SEIS does not adequately demonstrate how the loss of hydropower generation would be replaced without increasing costs to ratepayers, undermining rural resiliency, or forcing greater reliance on less reliable or higher-emission energy sources. Hydropower revenues also help offset operation and maintenance costs across the multi-purpose reservoir system. Their removal risks shifting long-term financial burdens onto water users, taxpayers, and rural communities without a clear or equitable mitigation strategy.

Detroit Reservoir Deep Drawdown Raises Unacceptable Risks
OFB is particularly concerned with the proposed late fall/early winter deep drawdown of Detroit Reservoir to facilitate juvenile fish passage. While the SEIS acknowledges adverse effects, the magnitude and severity of those impacts are understated, and critical lessons from recent drawdown experiences elsewhere in the basin are not fully incorporated.

Drinking Water Reliability and Public Health
Detroit Reservoir is integral to drinking water supplies for downstream communities in the North Santiam Basin, including Salem and numerous smaller municipal and rural systems. Deep seasonal drawdowns increase turbidity, mobilize fine sediment, and elevate the risk of harmful algal blooms—placing significant strain on drinking water treatment facilities and creating real public-health vulnerabilities.

Recent drawdown operations at other Willamette Valley reservoirs have demonstrated that turbidity impacts can be severe, prolonged, and costly for downstream water providers. Despite this real-world experience, the SEIS does not provide sufficient quantitative modeling of sediment mobilization, turbidity thresholds, treatment system capacity, or emergency response planning. Proceeding without this analysis risks repeating known failures and placing an unacceptable burden on communities that depend on reliable, clean drinking water.

Water Security for Agriculture and Fire Suppression
Deep drawdowns also jeopardize spring refill reliability, reducing stored water availability for irrigation, municipal supply, and emergency uses. For agricultural producers, dependable seasonal storage is essential to crop viability, livestock operations, and food production. In addition, Detroit Reservoir serves as a strategic water source for aerial wildfire suppression. Reduced reservoir elevations during shoulder seasons compromise access to this critical resource at a time when wildfire risk remains high.

Recreation, Local Economies, and Community Recovery
Detroit Lake is one of the most heavily used recreational reservoirs in the Willamette Basin and a cornerstone of the Santiam Canyon economy. Earlier and deeper drawdowns shorten

the recreation season, limit boat ramp access, degrade reservoir aesthetics, and threaten the viability of local marinas, campgrounds, lodging providers, and small businesses.

These communities are still recovering from the devastating 2020 wildfires. The SEIS's reliance on broad regional economic modeling obscures the acute, localized economic harm that would be borne by Detroit, Idanha, and surrounding communities. NEPA requires a transparent evaluation of these localized impacts where intensity and severity are high, and that standard has not been met.

Resident Fisheries and Kokanee Impacts
The SEIS places heavy emphasis on ESA-listed anadromous fish while giving insufficient attention to resident fisheries, including the kokanee fishery at Detroit Reservoir. Deep drawdowns degrade spawning habitat, increase entrainment and mortality, and risk collapsing fisheries that provide substantial recreational and economic value to the region. The loss of kokanee at Green Peter Reservoir following drawdown operations should serve as a clear warning, yet the SEIS does not adequately analyze population-level effects, mitigation measures, or adaptive safeguards for resident fish.

Uncertain Benefits, Real and Lasting Costs
OFB continues to question whether the proposed drawdown will deliver meaningful, measurable benefits for ESA-listed fish populations. The SEIS does not provide Detroit-specific survival modeling, basin-wide population response analysis, or empirical evidence demonstrating that similar drawdowns have improved fish recovery outcomes elsewhere in the system. In contrast, the adverse impacts to water quality, water supply, recreation, energy reliability, and rural economies are well documented and immediate.

Need for Reasonable Alternatives and Stronger Safeguards
NEPA requires a rigorous evaluation of reasonable alternatives that avoid or minimize harm. The SEIS should more fully analyze operational approaches that reduce drawdown depth or duration, modify timing to avoid conflict with drinking water and recreation needs, accelerate structural fish passage solutions, and incorporate enforceable adaptive management triggers. Clear accountability for costs, risks, and mitigation must be established before irreversible actions are taken.

Conclusion
OFB supports balanced, science-based stewardship of Oregon's water, energy, and environmental resources. However, the Draft SEIS continues a trajectory that prioritizes speculative ecological outcomes over demonstrated, longstanding public benefits. Eliminating hydropower and implementing deep reservoir drawdowns without clear evidence of necessity or effectiveness places Oregon's agricultural producers, rural communities, and critical infrastructure at unnecessary risk.

We respectfully urge the U.S. Army Corps of Engineers to reconsider the scope and assumptions of the Draft SEIS, strengthen its analysis of real-world impacts, meaningfully engage affected communities, and pursue alternatives that protect both ecological objectives and Oregon's agricultural and rural future.

Thank you for the opportunity to provide comment. OFB remains committed to constructive engagement and stands ready to work with the Corps to identify solutions that reflect the full range of authorized purposes and public interests served by the Willamette Valley System.

Respectfully submitted,

Ryan J. Krabill
Oregon Farm Bureau

From:	Jason Pulley
To:	CENWP-PME-Williamette-Valley-System-EIS
Subject:	[Non-DoD Source] Salem Comments - DRAFT SEIS
Date:	Tuesday, January 13, 2026 9:32:20 AM
Attachments:	image001.png City of Salem Comments - Draft SEIS 2026-01-13.pdf City of Salem Attachment DRAFT SEIS Comments.pdf City Salem to USACE Attachment A.pdf

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Greetings,

Please find attached the City of Salem's comments on the Draft SEIS for the Willamette Valley System and applicable attachments.

The City appreciates the opportunity to comment on the proposed actions.

Jason Pulley
Utility Planning Manager
City of Salem | Public Works Department
555 Liberty Street SE, Rm 325, Salem OR 97301
jpulley@cityofsalem.net
Office: 503-588-6398 | Cell: 503-932-1517

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:

Brian D. Martin, PE, Public Works Director
Dan Atchison, City Attorney

Davis Wright Tremaine LLP

Suite 700
560 SW 10th Avenue
Portland, OR 97205-2702

Olivier Jamin
5037785346 tel
Olivierjamin@dwt.com

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.

Davis Wright Tremaine LLP

Suite 700
560 SW 10th Avenue
Portland, OR 97205-2702

Olivier Jamin
5037785346 tel
Olivierjamin@dwt.com

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.

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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.

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

January 12, 2026

Delivered via Electronic mail and U.S. Post

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette SEIS
P.O. Box 2946
Portland, OR 97208-2946

Re: City of Salem Public Comments on Draft Supplemental Environmental Impact Statement

The purpose of this letter and its supporting attachment is to provide comments from the City of Salem (City) regarding the *Willamette Valley System Operations and Maintenance Draft Supplemental Environmental Impact Statement* (Draft SEIS) that was issued by the U.S. Army Corps of Engineers (USACE) in November 2025. The Draft SEIS fulfills two directives contained in the 2024 Water Resources Development Act: (1) It identifies options to permanently end federal hydropower production at eight Willamette Valley Dams; and (2) It evaluates options to comply with the Biological Opinion (BiOp) by the National Marine Fisheries Service (NMFS) regarding annual deep drawdowns of Detroit Reservoir. The City's comments are specific to the deep drawdowns, in which the level of Detroit Reservoir is proposed to be dropped to a historically low elevation each year to facilitate the out-migration of threatened fish species.

First and foremost, the City continues to support the actions of the USACE, NMFS, and other federal, state, and local agencies intended to enhance habitats and support out-migration of 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 members of the Tribal Nations. Finally, the City acknowledges and appreciates that the Draft SEIS addresses many of the concerns we have expressed to the USACE over the past 12 months. Among the significant commitments made by the USACE in the Draft SEIS that are responsive to our concerns:

(1) The USACE will "initiate the drawdown closer to late November or early December" (Page 18).
(2) The deep drawdown will be conducted "in a stepwise manner" (Pages ES-9, 210).
(3) The duration of the deep drawdown "is set to last for two weeks" (Page 18).
(4) The incremental deep drawdown approach "would span over three years" (Page 90).

However, the City remains deeply concerned at the absence in the Draft SEIS of any reference to turbidity triggers and accompanying action measures. As described and justified in our comments

below and in our previous comments (see Attachment), these two important operational factors must be incorporated into the Final SEIS.

Key Recommendation: Establish a Turbidity Trigger of 10 NTU/12 hours to Cease the Drawdown

It is critical that the USACE adopt a turbidity trigger which, if exceeded over a specified period of time, will cause the immediate cessation of drawdown operations and the resultant return of Detroit Dam and Detroit Reservoir to normal operating conditions. The purpose of the turbidity trigger is to protect human health, protect the City's water treatment system, and protect the City's customers. Once drawdown operations cease, it is anticipated that turbidity levels in the river will decrease over time and normal operations at the City's water treatment plant will be able to resume. Further, to provide time to restore normal operations and to evaluate lessons learned, once the turbidity trigger has been exceeded, drawdown operations should not resume again until the following year. This recommendation is based on years of operational experience coupled with scientific research conducted over the past 12 months.

Additionally, a turbidity trigger should be the minimum safeguard for downstream water users to protect from reasonably foreseeable environmental effects of the proposed action. The Thomas R. Carper Water Resources Development Act of 2024 (WRDA 2024) required that the Corps complete a report on instances in which turbidity concerns have arisen following a drawdown at a reservoir in the Willamette Valley, including "identify(ing) lessons learned associated with turbidity resulting from drawdowns and … how changes based on those lessons learned are being implemented." Absent completion of the report, the Corps should proceed with the drawdown of Detroit Reservoir under strict guidelines for downstream water quality while data is being collected and analyzed from similar operations in the Willamette Valley. Given that the Corps failed to analyze specific turbidity level effects from the proposed action on downstream users, a strict turbidity trigger that protects downstream users is a reasonably prudent alternative.

The specific recommendation is that the turbidity trigger should be set at a reading of 10 NTU[1] or above, experienced over a period of 12 consecutive hours, as measured at the United States Geological Survey's (USGS) Niagara gauge. (USGS-14181500).

ADDITIONAL BACKGROUND INFORMATION.

The City's Responsibilities as Regional Water Provider

The City is the only regional water provider in the Mid-Willamette Valley. We are responsible for supplying safe and reliable drinking water to approximately 220,000 individuals and thousands of properties that include hospitals, schools, businesses, industries, irrigators, multifamily housing units, and

[1] Nephelometric Turbidity Units (NTU) and Formazine Nephelometric Units (FNU) are measures of the clarity of the water. The City typically reports turbidity levels in NTU; the USACE typically reports turbidity levels in FNU. Although the two units reflect the same characteristics, the analytical methods used to determine FNU and NTU are different and the two are not numerically interchangeable. Generally, water with turbidity of 10 NTU or 10 FNU or less looks clear. Water with turbidity of 50 NTU or 50 FNU looks cloudy; water with turbidity exceeding 500 NTU or 500 FNU looks muddy.

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 48,000 citizens of the cities of Stayton and Keizer should either, or both, municipalities suffer impairment to their own drinking water systems.

High Turbidity Endangers Treatment System, Places Customers at Risk, Limits Future Growth

At issue is the fact that the deep drawdown of Detroit Reservoir will increase the presence of fine particles in the North Santiam River, the source of drinking water for the region served by the City. These particles pose a significant risk to the City's slow sand filtration treatment system that is located on Geren Island on the North Santiam River near downtown Stayton.

Highly turbid water, if allowed into our treatment system, will clog the sand filters. Run times between filter maintenance periods will be significantly reduced, the cost and time to recondition each filter will substantially increase, and drinking water production from our treatment plant will be considerably diminished. If, to protect the sand filters, the City closes the intake gates from the North Santiam River, our ongoing ability to meet water demand will depend solely on the amount of water stored in reservoirs, water drawn from a handful of wells, and water provided through interties with the City of Keizer. At this writing, the City has embarked on substantial capital investments, expected to cost approximately $8 million, to prepare for potential disturbances caused by the drawdown. These improvements are not yet complete. With these significant investments, the City believes we can meet winter demand during the 2026 deep drawdown but there is *no assurance* that we will be able to meet future demands, which are expected to grow higher with each passing year. Further, under this mode of operation there is *limited redundancy* in the system. Should a critical component of one or more of these alternative sources of drinking water fail, our ability to supply water may fall below the demand of our many customers. Depending on the severity and duration of the shortfall, the consequences range from temporary inconvenience to untenable and unsustainable risks to life, property, and livelihood.

In addition to limited potentially life-saving redundancy, operating a regional water supply system at or near capacity with no back-up will also create a significant and highly consequential condition – it could *limit opportunities for future growth*. Economic growth invariably relies on a region's ability to reliably provide essential services, water being the most critical of these. No housing deficiency can be addressed if there is insufficient water for new residential development. No new businesses, small or large, will locate in our service area if our ability to provide drinking water is questionable. No water-dependent industry seeking a new location will select Salem if we cannot provide assurances of reliable, year-round water for its production.

How the City Treats Water under Normal Turbidity Conditions

Under normal operating conditions, the City draws raw water from the North Santiam River through intake gates at our facility on Geren Island. This water is treated using slow sand filtration, a highly

reliable, time-tested method for producing drinking water. For sand filters to properly operate, the intake water must have very low levels of turbidity. Typically, the water drawn from the North Santiam River has a turbidity level of less than 10 NTU. At this level, our sand filters can operate for about three months before the filter must be taken offline for cleaning (scraping 0.25 to 0.5 inches from the top layer of sand) and reconditioning (allowing a biological layer of microorganisms to regrow on the surface of the sand).

How the City Treats Water under Elevated Turbidity Conditions

There are naturally occurring, short-term periods during which the turbidity levels in the North Santiam River increase well above 10 NTU. High turbidity is typically caused by storm events, which increase runoff volumes and sediment transport from up-river creeks and streams. The City's operational procedure in anticipation of high turbidity in the river involves filling the slow sand filters to their maximum capacity prior to the arrival of high turbidity and then closing the intake gates. With the gates shut, the filters can operate for about three days until low water levels in the filters required them to be taken offline. Historically, high turbidity levels triggered by storm events have lasted less than three days.

Results of Research on the Consequences of High Turbidity

There is little question that the deep drawdown will elevate turbidity levels in the North Santiam River, both during the initial drawdown, during subsequent drawdowns, and for a significant period of time after each drawdown operation has ended. As stated earlier, typical turbidity levels in the North Santiam River at our intake gates is less than 10 NTU. Of concern is information collected by the USACE during initial drawdowns in 2023 impacting the South Santiam River. Data provided by the USACE showed turbidity levels ranging from roughly 50 FNU (see footnote on Page 2) to over 450 FNU. Data from the most recent drawdown conducted in 2025 indicate sustained turbidity levels had decreased but still ranged between approximately 20 and 80 FNU. The adverse impacts of sustained elevated levels of turbidity in the City's intake from the North Santiam River are summarized below.

1. Short-term Impacts to Our Filters

   The City conducted extensive research in 2025 to determine the risks of keeping the intake gates open and allowing highly turbid surface water into a slow sand filtration system. Based on this bench-scale scientific testing, we now know that turbidity levels as low as 50 NTU will reduce the runtime of a slow sand filter from approximately three months to three weeks. Higher turbidity levels will result in even lower runtimes, some of which are less than 24 hours. Additionally, fine particles from highly turbid intake water can penetrate deep into a sand filter, essentially fouling the entire depth of the sand bed well beyond the typical 0.25-0.5 top inches. This will significantly increase the cost and complexity of reconditioning a filter and measurably reduce the life cycle of a filter from four years to less than two months. Restoring a filter to full operational status once the filter has been terminally fouled can require up to six months to drain the water, remove the clogged layer of sand, procure and then replace the bed with new sand, and restore the biological layer in the rebuilt filter bed. The time required to return a filter from failure to full operational status is expected to extend beyond winter drawdown and into the summer months, a period during which water demand will be at its highest. The estimated cost to replace

a filter bed ranges between $3 million and $4 million *each*. The City will have no choice but to pass this cost burden to our customers in the form of rate increases.

2. The Longer-term and Recurring Impacts
   The adverse impacts of highly turbid water entering the City's sand filtration system extend well beyond the immediate period of the deep drawdown. Rehabilitating filters lost to sustained turbidity is a labor-intensive and expensive endeavor. There are long-term consequences related to increases in operating and capital budgets which will drive utility rates higher. There are challenges related to limited staffing, uncertainty in supply chains and procurement, and indeterminate planning timelines. The time required to restore filters to full operation may extend into the spring and summer months, a period during which water demand is at its highest. Among the potential consequences is the real possibility of compromising the City's ability to meet peak summer demands while, concurrently, adversely impacting the City's ability to prepare for the next deep drawdown later in the same year.

3. Risks of Total Reliance on Alternative Water Sources
   If the intake gates remain shut because of high turbidity in the river, or if the sand filters are offline for cleaning and reconditioning post-drawdown, the City must rely on water drawn from groundwater wells, water stored in our reservoirs, and water provided via an intertie with the City of Keizer. Depending on the time of year, the duration of the high turbidity, and the time needed to restore operations of slow sand filter(s), these alternate sources may not be able to meet the demand of our water customers. We estimate that existing alternative water sources – wells, reservoirs, and interties – will meet the projected water demand during the timeframe of the first proposed drawdown. However – and this is a significant consideration – under this mode of operation there is *limited 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, creating an unacceptable risk to human health and safety.

Advantages of Implementing Turbidity Triggers and Action Measure

Among the advantages to having turbidity triggers.

Frames Intergovernmental Collaboration

Including this turbidity trigger level and action measure in the Final SEIS will require the City and USACE engage in follow-up conversations to establish details such as: communication protocols, pre-approved authorities for implementation of action steps, reporting requirements, and specific details regarding the immediate and follow-on measures to be taken.

Facilitates Compliance with the Federal Clean Water Act

Adopting turbidity triggers would also allow USACE to reconcile the proposed drawdown action with potential violations of the federal Clean Water Act (CWA). The CWA addresses, among many other things, contaminants in water resources. There is no doubt that causing high levels of turbidity

should be considered a violation of the CWA. Water quality sampling data show that typical turbidity levels at the City's intake from the North Santiam River are well below 10 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 turbidity levels reported by the USACE during drawdown operations on the South Santiam River clearly violated federally approved state water quality standards. There is little doubt that turbidity levels in the North Santiam River during the deep drawdown will rise above "natural stream turbidities" by more than 10 percent. From a regulator perspective, once a violation in water quality standards has occurred, among the correction actions is to cease the activity causing the violation. The Oregon Department of Environmental Quality may consider a turbidity trigger and corrective action to stop the drawdown as appropriate measures which will allow the USACE to avoid liability related to violations of state and federal law.

Supports Compliance with the Federal Safe Drinking Water Act

Adopting turbidity triggers would also allow USACE to reconcile the proposed drawdown action with potential violations of the federal Safe Drinking Water Act (SDWA). The Safe Drinking Water Act (SDWA) requires persons to protect public water systems. The Draft SEIS does little to address potential violations of the SDWA. The proposed drawdown is expected to 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 SDWA.

SUMMARY OF RECOMMENDATIONS AND CONCLUSION

Six Recommendations

While there is much to be commended in the Draft SEIS, the City presents to the USACE six specific recommendations for incorporation into the Final SEIS.

Recommendation #1: Acknowledge the Significance of Increased Turbidity

The City disputes that the proposed drawdown of Detroit Reservoir, even following a stepwise approach, would cause only a "moderate increase in sediment and turbidity levels" in the North Santiam River (see Page ES-9). The word "moderate" is subjective and situational. Based on our best professional judgement, which is now backed up by extensive research and bench-scale testing, levels of turbidity as low as 50 NTU – a measure potentially viewed as "moderate" by some – will have

significant and sustained consequences to our treatment systems. For the Final SEIS, a more accurate sentence would read:

> *For water quality and drinking water, the deeper drawdown of Detroit Reservoir would cause ~~a moderate~~ an increase in sediment and turbidity levels downstream of Detroit Reservoir during the operation. This increase will threaten the operation of the slow sand filtration systems operated by the City of Salem and the City of Stayton.*

Recommendation #2: Establish the Need for a Turbidity Trigger and USACE Response

A stepped approach alone is insufficient to protect human health and safety for communities relying on the North Santiam River for drinking water, firefighting, industrial production, and commercial purposes. The USACE *must* adopt in the Final SEIS a clear turbidity trigger consisting of a NTU level that, if exceeded over a specific period of time, will require cessation of the drawdown operation. A turbidity trigger with mandated actions will provide a degree of certainty and significantly enhance the City's ability to develop contingency and recovery plans. This recommendation comes with a commitment by the City to work with the USACE and to share information, data, and research results to help support a turbidity trigger that protects public health, lowers risks, supports long-term objectives of the drawdown, and reflects current scientific research and sound engineering practices.

Recommendation #3: Establish a Turbidity Trigger of 10 NTU over 12 Hours to Cease Operations

The City's specific recommendation, which is consistent with multiple conversations with the USACE and supported by scientific research, is that a firm turbidity trigger of 10 NTU should be established in the Final SEIS. Based on the anticipated variability of turbidity in the North Santiam River during the drawdown, the City further recommends that a time duration of 12 hours be incorporated as part of the trigger. Once this trigger is reached, the USACE should cease all drawdown activities for that year and allow the City's water treatment system to recover and resume full operation. Based on the studies and research conducted, the City strongly recommends that the USACE establish in the Final SEIS a turbidity trigger as follows:

> **The USAC will immediately take steps to cease the deep drawdown operation and restore Detroit Dam and Detroit Reservoir to normal operations the moment turbidity levels in the North Santiam River, as measured at the USGS Niagara gauge, have been at or above 10 NTU for 12 consecutive hours.**

Recommendation #4: Evaluate Merits of Delaying Implementation

The Final 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 develop and test

wells currently under construction to determine if they have sufficient yield to provide resiliency and mitigate risks to life, property, and livelihood.

Recommendation #5: Focus on a Long-term Strategy of Implementing Structural Solutions

Our read of the BiOp, the Final Programmatic Environmental Impact Statement[2], the Draft SEIS, and various reports and evaluations, is that the long-term strategy does not focus on year over year deep drawdowns. However, the long-term strategy *requires implementation* of structural remedies designed to facilitate out-migration of threatened species. The current Draft SEIS considers annual deep drawdowns of Detroit Reservoir as an "Interim Operation" that will occur "until the long-term solution for downstream fish passage and water temperature management at the respective location is in place and operational" (Page 17). We agree, but as written in the Draft SEIS, as implied in recent public meetings, and as demonstrated by the years that have passed since the structural solutions were first proposed, implementation of structural measures have not been a priority. The Final SEIS should clearly state the intention of the USACE to pursue all means available to secure funding, initiate project planning, and ultimately construct what is expected to be the long-term strategy to support the out-migration of threatened species. Until these measures are in place, the financial burden and high-risk scenarios are being borne not by the responsible federal agencies but by local jurisdictions and our ratepayers.

Recommendation #6: Employ Adaptive Management with Each Annual Drawdown

The underlying Biological Opinion for the Willamette Valley System requires development of an Adaptive Management Plan that includes "decision criteria" that guide strategies (see Section 2.5.10 of the BiOp). At issue for the City is a pressing 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 winter water demand. If the City adds a new industrial customer with a high, year-round water demand, the risks/consequences assessment must be reevaluated.

(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 that year's deep drawdown.

[2] "Willamette Valley system operations and maintenance: Final environmental impact statement." United States Army Corps of Engineers. Portland District. April 2025.

In the context of Adaptive Management, there is the ambiguity in the Draft SEIS regarding the duration of the drawdown, which "is set to last two weeks" (Page 18) and the timespan of the incremental steps toward the ultimate desired elevation in the reservoir which "would span over three years" (Page 90). For our purposes of operational planning and risk management, the City requires assurances that the duration of the deep drawdown "~~is set to last~~ will not exceed two weeks" and the incremental drawdown approach "would span ~~over~~ at least three years." Further, a requirement for the USACE to conduct additional analysis, reviews, and consultation with affected parties should incorporated into the Final SEIS to provide assurances that the USACE will employ both science-based *and* risk-based decision making during the course of adaptively managing the drawdown operations over the years.

Conclusion

In conclusion, the City is grateful that the Draft SEIS addresses several of the concerns we have expressed over the past year in our conversations with the USACE regarding the risks each deep drawdown will present to our water treatment plant and our customers. However, the absence of any references to turbidity triggers and action measures is deeply troubling. Clear triggers and actions are essential for the City's operational and contingency planning. Establishing mutually acceptable triggers and action measures also represents the best way forward for providing assurances to our current and future regional customers that safe drinking water will continue to be reliably delivered. Lastly, turbidity triggers and action measures will facilitate the USACE's compliance with the federal Clean Water Act, federal Safe Drinking Water Act, and Oregon State Water Quality Standards, among other regulations. 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 without some kind of documented assurances that the drawdown operations will cease before the high levels of turbidity have resulted in highly consequential harm has occurred to our treatment system and our customers have been placed at risk.

The City is committed to working with the USACE and others to evaluate and, ultimately, to implement measures that support downstream passage of juvenile species, protect habitat and water quality, ensure water demands are met, and provide for the many users of the North Santiam River.

Sincerely,

Krishna Namburi

Krishna Namburi
City Manager

Attachment: "City of Salem Public Comments on USACE's Proposed Detroit Reservoir Drawdown." *Letter*. Salem, Oregon. June 20, 2025

From:	Michael Karnosh
To:	Caswell, Larry Dale (Dale) JR COL USARMY CENWP (USA); Wells, Elizabeth R CIV USARMY CENWP (USA); Oliver, E A (Liz) CIV (USA); CENWP-PME-Williamette-Valley-System-EIS; Hines, Kirsten Tracy (KiKi) CIV USARMY CENWP (USA); Tackley, Kathryn L CIV USARMY CENWP (USA)
Cc:	Stacia Martin; Bryan Langley; Kelly Dirksen; Lawrence Schwabe; Alyssa.M.MUCKEN@water.oregon.gov; "Tom.Stahl@odfw.oregon.gov"; Kelly.E.REIS@odfw.oregon.gov; djspear@bpa.gov; Jeff Maslow; Connor,Joseph W (BPA) - AIT-7; HIBBS Rob * ODA; HIGBY Christina * ODA; "scott_covington@fws.gov"; michael_hudson@fws.gov; "Wigal.Jennifer@deq.state.or.us"; Heather.TUGAW@deq.oregon.gov; grace.goldrich-middaugh@deq.oregon.gov; "kathleen.wells@noaa.gov"; anne.mullan@noaa.gov; "lance.kruzic@noaa.gov"; "rsalakory@nwcouncil.org"; "potoole@nwcouncil.org"; "Mbabaliye.Theogene@epa.gov"
Subject:	[Non-DoD Source] Letter to USACE Portland District Commander from Grand Ronde Tribal Council
Date:	Tuesday, January 13, 2026 8:12:49 AM
Attachments:	CTGR comment letter to Col Caswell_SEIS_1 13 2026.pdf
Importance:	High

Dear Col. Caswell:

Please find attached a letter from Grand Ronde Tribal Council with comments on the Willamette Valley System Supplemental Environmental Impact Statement.

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
Umpqua Molalla Rogue River Kalapuya Chasta

Tribal Council
Phone (503) 879-2304
Fax (503) 879-5964

1-800-422-0232
9615 Grand Ronde Road
Grand Ronde, OR 97347

January 13, 2026

U.S. Army Corps of Engineers
Portland District
ATTN: Col. Larry Dale Caswell, Jr., District Commander
Portland, Oregon 97204

via email

RE: Willamette Valley System Supplemental Environmental Impact Statement (SEIS) Tribal comments, adaptive management, and steps moving forward

Dear Col. Caswell,

On behalf of the Confederated Tribes of the Grand Ronde Community of Oregon (Grand Ronde or Tribe), thank you for the opportunity to comment on the SEIS for the operation of the Willamette Valley System dams. Through Cooperating Agency meetings, government-to-government consultation, verbal and written comments submitted in U.S. Army Corps of Engineers (Corps) processes, Grand Ronde has communicated its questions and concerns about the Willamette Valley System (WVS), and the Tribe appreciates those opportunities.

Grand Ronde is made up of more than 30 antecedent tribes and bands with homelands in western Oregon, southwest Washington, and northern California. Since time immemorial, our ancestors have fished, hunted, and managed resources in the rivers and watersheds that today are regulated and impacted by the Willamette Valley System. After signing the ratified Willamette Valley Treaty of 1855, which includes the entire area regulated by the WVS, our ancestors were forcibly removed from our homelands to the Grand Ronde Indian Reservation. Despite this removal and other hardships, our deep connections to our homelands and traditions have remained unbroken. Our people have experienced many kinds of loss over the past 200 years, one of which is the drastic decline and near-extinction of spring Chinook salmon and winter steelhead in the Upper Willamette River. We remain hopeful that diligent, informed effort can slow and eventually reverse this alarming trend, but we know that time is running out to effectively recover our native salmon populations.

I. Native salmon runs can and should co-exist successfully with other resources, just as they did for thousands of years before dam construction.

It is very unfortunate that Grand Ronde's advocacy for native salmon recovery has at times been seen as anti-water quality, anti-local community, anti-recreation, or at least in conflict with these other resources. This portrayal is a tragic misinterpretation of Tribal values and positions which has led to some broad misunderstandings. This is not the Corps's doing, but it is still worth elaborating on.

Hearing about the WVS in the recent past, one could easily get the overall impression that the major issue is "Salmon versus People", "Salmon versus Water Quality", "Native Salmon versus Recreation", or something along those lines. The truth is much more nuanced and much less of a zero-sum game than what is sometimes portrayed. Providing needed protection to native salmon does not have to "cost" the local community's economy, recreation, and water quality.

Grand Ronde is not against recreational opportunities, economic development, or the quality of life in local communities. In addition to being a sovereign Tribal Nation, Grand Ronde is itself a local community facing challenges and seeking to be heard by state and federal agencies. The Tribe envisions thriving local communities where necessities such as drinking water meet the highest standards and where economic drivers such as recreation and tourism are allowed to grow. The Tribe also envisions our sacred salmon returning in the numbers they once existed in the North Santiam, South Santiam, McKenzie, Middle Fork, and other parts of the Willamette River Basin. These are not, and should not be made out to be, mutually exclusive visions for the future.

Grand Ronde has been very vocal and forthcoming about its desire to work together in partnership with the communities of the Willamette River Basin. We reiterate that desire here. It is our hope that together we can find solutions that benefit all resources and communities.

II. Neglecting to perform a dam-by-dam hydroelectric authorization removal analysis amounts to a missed opportunity by the Corps; this must be corrected.

Rather than conduct a dam-by-dam analysis of whole or partial hydropower removal, as properly directed by the WRDA 22 and WRDA 24 Acts of Congress and as urged by multiple Cooperating Agencies in their verbal and written comments, the Corps decided to interpret Congressional intent as narrowly as possible in the draft SEIS. The result is Alternative 6, a one-size-fits-all action replacing all hydroelectric turbines with costly and salmon-lethal cone valves.

This is a missed opportunity for several reasons. First, it does not make the need for a robust hydropower deauthorization study simply go away; if anything it raises stronger concerns about why the Corps is so reluctant to take a more thorough look at the federal Willamette Valley hydrosystem that is projected to lose a staggering $939 million over the next 30 years. Dam-by-dam hydropower deauthorization scenarios are needed, if for no other reason than to remedy this projected loss of public funds.

Second, it fails to meaningfully evaluate whether altered hydroelectric operations at reservoirs could relatively benefit salmonid species listed under the Endangered Species Act, which was an explicit purpose of the study ordered through WRDA 22 and the intent behind the alternative ordered through WRDA 24. It does not take a licensed civil engineer or a practicing fish biologist to understand that plugging gigantic cone valves into all hydropower penstocks would cost a lot of money and kill a lot of fish. Such an obviously harmful, wasteful alternative goes against stated Congressional intent in better understanding the complex, multifaceted, multi-project Willamette Valley System and the possibilities of altering WVS configurations to benefit fish and wildlife among other resources.

Third, it means that going forward under the WVS Biological Opinion issued in 2024, the framework under which solutions will likely be evaluated will be full hydropower authorization, since Alternative 5 remains the preferred alternative. This means that minimum hydropower pools will need to be observed at the eight projects generating hydropower. Instead of extra flexibility to explore operational solutions that could be both more beneficial to salmon and more efficient economically, there will be less flexibility.

Grand Ronde understands that the Corps has acted under its official interpretation and guidance in developing Alternative 6. The Tribe also understands that, to conduct a sufficiently thorough dam-by-dam analysis, the Corps will need much more funding than the amounts Congress has appropriated so far. We continue to advocate for good faith exploration and evaluation of structural/operational changes that make sense for both salmonid recovery and the system as a whole; in other words, a funded dam-by-dam authorized purpose analysis with inclusion of Cooperating Agencies is required.

III. In the absence of structural solutions to the lack of fish passage, operational solutions are necessary. The Tribe supports December drawdown operations at reservoirs, provided that effective flexibility (adaptive management) is in place.

Chapter 3 of the SEIS addresses the proposed drawdown operation at Detroit Reservoir. Grand Ronde appreciates the attention the local communities have drawn to this topic, as well as the information the Corps has presented at its public meetings.

Deep drawdowns are an effective and important operational measure for passage of out-migrating juvenile salmonids in reservoirs, given that the WVS projects do not currently include surface collectors or other structural passage features. Fall drawdowns can be successfully done with limited impact to water quality and fall fishing, and with a much-needed boost to downstream native salmon passage. The Corps's commendable performance of the Fall 2025 drawdown at Green Peter Reservoir has shown this.

Spring Chinook salmon and winter steelhead in the Upper Willamette River remain at high risk of extinction; the fact that some recent years' runs do not even amount to one-half of one percent of their historic numbers, shows that time is rapidly running out. Given that any other type of dam retrofit or alteration will likely have a much longer timeframe than the 3 to 5 years it will take to know the outcomes of deep drawdown, for the survival of listed native salmon the continuation of fall deep drawdown operations has the greatest chance of success. Operational flexibility through careful monitoring, evaluation, and adaptation will be needed, of course, but for near-term survival there is no better option.

The Corps's Flood Risk Management Mission Statement concludes with the words "...and improve the natural environment"; we are committed to helping the Corps achieve that mission. We remain hopeful that through informed, frequent discussions and updates, a willingness to initiate on-the-ground solutions, effective monitoring of those solutions, and adaptive management, we will expedite the most effective path forward to full salmon recovery. We look forward to joining you and your staff on the Willamette Action Teams for Ecosystem Recovery (WATER) and in other forums. Once again, thank you for this opportunity. If you or your staff

would like to discuss any of these comments further, please contact Michael Karnosh, Ceded Lands Manager, at (503) 879-1316 or Michael.Karnosh@grandronde.org to schedule a meeting.

hayu-masi (Many thanks),

Chris Mercier
Tribal Council Vice Chairman

CC: Office of Sen. Ron Wyden
Office of Sen. Jeff Merkley
Office of Rep. Suzanne Bonamici
Office of Rep. Maxine Dexter
Office of Rep. Val Hoyle
Office of Rep. Janelle Bynum
Office of Rep. Andrea Salinas
Liza Wells, Corps Deputy District Engineer for Programs and Project Management
Liz Oliver, Corps Project Manager, Willamette Valley System
Kirsten "KiKi" Hines, Tribal Liaison, Corps Portland District
Willamette Valley System Cooperating Agencies

From:	Julia Hajduk
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Willamettes.eis@usace.army.mil
Subject:	[Non-DoD Source] Stayton Oregon SEIS comments
Date:	Monday, January 12, 2026 4:33:11 PM
Attachments:	image001.png image002.png Stayton Oregon SEIS comments 1-12-26.pdf

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Hello. Please find the City of Stayton's comments on SEIS for the Detroit Dam Drawdown.

Thank you,

Julia

Julia Hajduk
City Manager

362 N. 3rd Ave
Stayton, OR 97383
Phone 503-769-3425

City of Stayton

Administration • Finance
362 N. Third Avenue • Stayton, OR 97383
Phone: (503) 769-3425 • Fax (503) 769-1456

January 12, 2026

By U.S. Mail and E-mail (willametts.eis@usace.arm.mil)

Liz Oliver, Portland District Project Manager
United States Army Corps of Engineers

Attn: CENWP-PME-E / Willamette SEIS
PO Box 2946
Portland, OR 97208-2946

RE: COMMENTS on SUPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (SEIS) DETROIT DAM DEEP DRAWDOWN (DDDD)

Dear Ms. Oliver,

The City of Stayton submits the following comments on the U.S. Army Corps of Engineers' November 2025 Draft Supplemental Environmental Impact Statement ("Draft SEIS") for the operation and maintenance of the Willamette Valley System. The City draws its water from the North Santiam River, downstream of Detroit Reservoir. While the Draft SEIS recognizes adverse impacts to downstream water systems and water quality from a drawdown of the reservoir, it does so generically and vaguely, without any indication that the Corps understands the significant impacts to the City's water treatment systems and ability to provide water to residents and for critical City functions. As a result, the Draft SEIS also fails to identify any mitigation for this effect. The Draft SEIS thus does nothing to reassure the City and its residents that the Corps not only understands that the drawdown of the Detroit Reservoir could destroy millions of dollars of City infrastructure and prevent the delivery of *any* water for personal and municipal uses but intends to ensure that, if the drawdown goes forward, the Corps will ensure that the effects are mitigated.

I. The Draft SEIS Does Not Sufficiently Identify Effects of the Detroit Reservoir Drawdown on City of Stayton Infrastructure & Water Use.

The Draft SEIS generically acknowledges that an effect of the proposed interim operations, including the late fall/early winter deep drawdown at Detroit Reservoir, will be to mobilize fine sediments and result in increased downstream turbidity, with associated effects to water quality and water treatment facilities. However, the Draft SEIS lacks the type of detailed evaluation of this effect that is required and that would allow the Corps to undertake a complete mitigation analysis. For example, the Draft SEIS identifies only increased maintenance and staffing of water treatment facilities and potential, unstated effects on water quality (e.g. at 170, 211). This reflects a lack of understanding that the type of municipal water treatment systems downstream of the Detroit Reservoir differ from those on the South Santiam in meaningful ways that will result in a significant and direct adverse effect on those systems and the communities they supply.

While the Draft SEIS references filtration broadly, it does not mention or evaluate the effect of a drawdown on the use of slow sand filtration (SSF) systems by multiple municipal water purveyors on the North Santiam River. SSF systems differ materially from rapid rate filtration, membrane treatment, or chemically assisted filtration processes (types used by South Santiam municipalities) in both design intent and operational resilience. As a result, generalized treatment references in the Draft SEIS do not adequately or accurately address how the sediment characteristics anticipated under the proposed action would affect SSF systems.

A. SSF Systems are Inherently Vulnerable to Very Fine Suspended Sediments and Elevated Turbidity

SSF systems vulnerability to fine suspended sediments is especially acute when those particles are dominated by silts, clays, colloids, organic fines, or algae. This vulnerability is a direct consequence of how slow sand filters function and where their treatment effectiveness is concentrated.

The primary treatment mechanism of a slow sand filter occurs at the surface biological layer (schmutzdecke) and within the upper ½ inch of the sand bed. Under normal operating conditions, this biologically active layer effectively removes pathogens and low concentrations of particulate matter through a combination of physical straining, adsorption, and biological degradation. However, when raw water contains sustained or episodic high turbidity, especially when dominated by very fine particles, those particles rapidly accumulate at the filter surface for

turbidities greater than 10 NTU.[1] This leads to premature clogging, a sharp increase in headloss, reduced hydraulic capacity, and shortened filter run times.

Very fine sediments are particularly problematic because they:

- Penetrate and compact the sand,
- Are poorly removed by simple sedimentation or hydraulic buffering upstream,
- Can smother or disrupt the schmutzdecke, reducing biological treatment effectiveness,
- Are slow to clear once loading subsides, even after turbidity levels return to baseline.

As turbidity increases, slow sand filters experience a non-linear loss of performance, where small increases in fine sediment loading can result in disproportionate reductions in filter run time and treated water output. This condition often necessitates frequent scraping or removal of the top sand layer, accelerating media loss, increasing labor demands, and reducing overall system reliability.

Once a slow sand filter is cleaned by scraping and the schmutzdecke is removed, the filter temporarily loses its primary fine-particle retention and biological treatment barrier. During this post-cleaning period, particularly if raw water turbidity remains elevated or is dominated by very fine sediments, fine particles penetrate deeper into the sand bed rather than being intercepted at the surface.

This deep bed penetration results in the progressive accumulation of fines within the interstitial pore spaces of the sand matrix, leading to internal clogging that is not readily reversible through surface scraping alone. Therefore, subsequent filter runs become progressively shorter, headloss development accelerates, and cleaning frequency increases – creating a compounding cycle of reduced performance and increased maintenance demand.

Repeated cleaning under these conditions also leads to:

- Accelerated loss of filter media due to frequent removal of the upper sand layers,
- Reduction in effective bed depth and treatment capacity,

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[1] The Corps typically refers to FTU, Formazin Turbidity Units, while modern water treatment relies on NTU (Nephelometric Turbidity Units). FTU is a legacy turbidity unit derived from non-standardized nephelometric measurements, whereas NTU is the current standardized and regulatory unit; such values should not be assumed to be directly interchangeable, and when evaluating turbidity for the purpose of effects on treatment systems, the Corps should utilize NTU consistently.

- Increased risk of fines breakthrough during the filter ripening period before the schmutzdecke is fully re-established,
- Elevated potential for turbidity spikes or particulate passage into finished water, particularly during start-up following maintenance.

Over time, the combination of deep bed fouling, media loss, and shortened ripening periods can compromise both the hydraulic and treatment integrity of the filter, ultimately necessitating partial or full media replacement. These impacts are especially pronounced under conditions of recurring fine sediment loading, such as those associated with reservoir drawdowns, storm-driven watershed disturbance, or prolonged elevated turbidity events.

Accordingly, SSF systems exposed to fine sediment dominated turbidity face a cumulative degradation of performance, rather than isolated operational challenges, reinforcing the need for effective pretreatment, conservative operational thresholds, and alternative treatment or supply strategies during high-risk raw water conditions.

SSF systems are therefore best suited to consistently low-turbidity source waters with limited fine sediment variability. They are not resilient to highly variable or storm-driven turbidity events, nor to conditions involving reservoir drawdowns, watershed disturbances, or algal and organic fines. Without adequate upstream pretreatment such as roughing-filters, bank filtration, off-stream storage, or advanced pretreatment processes, SSF systems face a heightened risk of operational failure during fine sediment loading events.

In summary, **SSF systems are operationally fragile when exposed to very fine sediments and elevated turbidity**, making source-water protection, pretreatment, and conservative operational thresholds critical to maintaining compliance and system reliability.

Recent operability testing and system evaluations conducted by the City of Salem to evaluate the effect of higher turbidity on its slow sand filters indicate that sustained fine sediment–dominated and high turbidity conditions comparable to those anticipated during deep drawdown operations would rapidly compromise the operability of direct online SSF systems. Such conditions are expected to result in accelerated surface clogging, deep bed penetration of fine materials following cleaning, shortened filter run times, loss of effective biological treatment capacity, and heightened risk of particulate breakthrough during filter ripening. These outcomes would likely render continuous operation of SSF systems unsustainable over a very short operational period without alternative supply activation or substantial pretreatment. Unlike the City of Salem, which utilizes some pre-treatment that may reduce turbidity or the percentage of finer sediment particles, the City of Stayton utilizes a direct online SSF system. Direct online SSF systems receive "raw" water directly from the running river. Thus, Stayton's water treatment infrastructure is at even greater risk of turbidity-related impacts from the Detroit Reservoir drawdown than the City of Salem.

The impacts described herein do not constitute a mere issue of temporary exceedance of drinking water quality standards or treatability. Rather, the projected fine sediment–dominated turbidity conditions associated with the Detroit Reservoir drawdown present a material risk of physical and functional destruction of critical drinking water treatment infrastructure.[2]

Under sustained or recurring fine sediment loading, SSF systems are subject to irreversible or near-irreversible operational failure mechanisms, including deep bed fouling, accelerated and unrecoverable media loss, collapse of biological treatment function, and structural degradation of the filter bed. These impacts are not correctable through standard operational adjustments or short-term compliance measures and extend beyond the scope of conventional drinking water standards enforcement or treatment optimization.

As a result, the foreseeable consequence of the Detroit Reservoir drawdown is not merely degraded water quality or the need for increased staffing or maintenance, but the inability of affected municipal water systems to operate at all, leading to a cessation of potable water production. This would directly impair the provision of water for essential municipal purposes, including residential supply, fire protection, public health and sanitation, and other critical community functions. Once such infrastructure failure occurs, service cannot be restored without substantial reconstruction, extended outages, and reliance on alternative water supplies.

Accordingly, this effect must also be evaluated as an infrastructure impairment and service continuity risk, rather than only a drinking water standards or maintenance cost issue. Failure to do so will result in understatement of the severity of reasonably foreseeable effect, mischaracterize the nature of the harm, and preclude informed decision-making regarding avoidance, minimization, and compensation measures necessary to protect public health and essential municipal services.

B. Necessary Revisions to the Draft SEIS to Fully Analyze Impacts

The FEIS and Draft SIES do not sufficiently identify and analyze impacts to communities and infrastructure anticipated to result from the Detroit Reservoir drawdown. Considering the high risk that the proposed interim operations will cause physical and functional destruction of the City of Stayton's drinking water treatment infrastructure, rather than merely temporary drinking water standards exceedances, the City respectfully requests that the Final SEIS include

[2] This contrasts with the types of water treatment systems used by municipalities on the South Santiam River, which while degraded in effectiveness and life span during the 2023 and 2024 Green Peter drawdown, were not functionally destroyed.

the following analysis to ensure full understanding, informed decision-making, and protection of essential municipal services.

a. Explicit Identification of Vulnerable Treatment Infrastructure

The Final SEIS should explicitly identify the presence of SSF municipal drinking water treatment systems and, more explicitly, direct online SSF systems, downstream of Detroit Dam and acknowledge that these systems are inherently vulnerable to fine sediment–dominated and sustained high turbidity conditions to a degree not experienced by other types of treatments systems, including those on the South Santiam River.

b. Treatment- and Infrastructure-Specific Impact Analysis

The Final SEIS should evaluate treatment-process-level impacts, not solely source-water quality changes, including:

- Deep-bed penetration of fine sediments following filter cleaning,
- Accelerated and unrecoverable filter media loss,
- Collapse of biological treatment function,
- Compounding maintenance and cleaning requirements,
- Risk of particulate and turbidity breakthrough during filter ripening, and
- The potential for complete loss of treatment operability over even short drawdown periods.

The Draft SEIS recognizes that there will be a "moderate increase in sediment and turbidity levels downstream of Detroit Reservoir." (ES-9). However, nothing in the draft indicates the meaning of moderate in this context or The Final SEIS cannot reasonably compare alternatives without a clear recognition and understanding of the vulnerabilities of water-treatment systems downstream of Detroit Reservoir.

The Final SEIS should explicitly assess the risk that the proposed drawdown of the Detroit reservoir would result in physical impairment or destruction of the City's treatment infrastructure, leading to the **cessation of potable water production**, rather than only temporary noncompliance with drinking water standards. This assessment should address impacts to:

- Residential water supply,
- Fire protection and emergency response,
- Public health and sanitation,
- Other essential municipal and community functions.

c. Cumulative and Recurrent Impacts Analysis

Because the Detroit Reservoir drawdown is an action planned to be repeated at least annually, the Final SEIS should analyze the cumulative effects of recurring or multi-year drawdown-related turbidity events on SSF systems, including progressive degradation, loss of remaining useful life, and the increasing likelihood of permanent infrastructure failure over the interim operations period.

This analysis is particularly important given that, even after a significant 2023 drawdown that caused massive turbidity increases in the South Santiam River, during the 2024 drawdown, the City of Sweet Home again experienced such significant turbidity that its drinking water treatment system struggled, and a state of emergency was declared. The Corps' use of adaptive management to mitigate effects of the drawdown by immediately ceasing the interim operation to prevent further harm to the City of Sweet Home is laudable. However, considering that experience, it is concerning that the SEIS does not fully evaluate the effects of a 2025 Detroit Reservoir drawdown on downstream municipal water systems, and in particular SSF systems which are much more sensitive to turbidity and fines than those on the South Santiam.

II. The Draft SEIS Fails to Identify Mitigation Measures for Water Treatment & Infrastructure Impacts.

If the Corps determines that the proposed action will occur despite the high risk of major impacts to the City of Stayton, the Corps must identify and describe options for avoiding and minimizing the impacts in the Final SEIS. Given the significance of the risk, the Corps also should identify compensatory mitigation options to be implemented either as alternatives to avoidance and minimization, or because of effects on City infrastructure despite efforts to avoid and minimize them.

While the Draft SEIS indicates that an "Emergency Response and Communications Plan" will be utilized, it does not identify what that plan will cover, how and when it will be developed, and whether stakeholders, including the City of Stayton, will provide input on its development.[3] The mere indication that an undefined "plan" will be used by the Corp does not satisfy the requirement to identify mitigation options.[4]

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[3] To the extent such a plan already exists for the Detroit Drawdown, the City has not found it in the FEIS, Draft SEIS, ROD or on the Corps' website.

[4] The Corps' April 2025 Final Environmental Impact Statement for the Willamette Valley System Operations and Maintenance barely acknowledge impacts to community water systems and does not even mention mitigation for such impacts, much less an emergency communication plan, despite being published after the adverse effects of the 2023 and 2024 Green Peter Reservoir drawdowns were known.

A. Avoidance and Minimization Measures

Avoidance and minimization options necessary to prevent infrastructure damage should include, but are not limited to the following practices and limitations:

i. Turbidity Monitoring – Location and Particle Size

The location at which turbidity is monitored during a drawdown of the Detroit reservoir is critical to the meaningful protection of downstream drinking water treatment infrastructure. The draft SEIS identified the turbidity monitoring location as Niagara, i.e. after release of water from the Detroit dam. Turbidity monitoring conducted at Niagara or below spillway and outlet releases is inherently insufficient for operational decision-making because it detects sediment conditions after fine materials have already been entrained, mixed, and irreversibly released downstream.

Fine sediment–dominated turbidity, particularly silts, clays, colloidal particles, and organic fines, behaves fundamentally differently from coarser suspended material. These fine particles remain in suspension for extended periods, are not effectively attenuated once mobilized, and can penetrate deep into SSF beds once introduced into downstream treatment systems. Detection of elevated turbidity at a post-spillway or downstream monitoring location therefore occurs too late to prevent infrastructure damage or operational failure, as the sediment pulse has already entered the river system and is no longer controllable.

To be operationally meaningful, **turbidity monitoring must be conducted in-pool and upstream of release structures, where sediment mobilization can be detected prior to discharge** and where adaptive management actions—such as modifying drawdown rates, suspending the drawdown, or activating alternative operations—remain feasible. In-pool monitoring provides early indication of fine sediment entrainment, including the mobilization of legacy sediments exposed during drawdown, which are most likely to produce the fine particle size fractions that pose the greatest risk to SSF systems.

Reliance on post-spillway turbidity monitoring conflates impact confirmation with impact prevention and fails to account for the time lag between sediment mobilization, downstream transport, and treatment system exposure. Because SSF systems are vulnerable to rapid and irreversible degradation once fine sediment enters the treatment process, monitoring that occurs after release does not provide a practicable opportunity to avoid infrastructure damage or service interruption. The Final SEIS's identification of mitigation options must acknowledge that monitoring limited to post-spillway or downstream locations is insufficient for infrastructure protection and shall not be relied upon as the sole basis for operational decision-making.

Accordingly, to satisfy NEPA's requirement for meaningful impact disclosure and mitigation, turbidity monitoring associated with interim operations must be relocated or supplemented with in-pool, upstream monitoring points specifically designed to detect fine sediment mobilization before discharge. Without such monitoring, the proposed operations lack

an effective mechanism to prevent foreseeable infrastructure destruction and cessation of drinking water service in the City of Stayton.

ii. Adaptive Management and Triggered Operational Responses

The Final FEIS should articulate the components of an adaptive management plan aimed at avoiding and minimizing any effects on the City's infrastructure and ability to provide water for standard uses. Adaptive management for mitigation must include metrics and actions tied to the operational parameters and real-time status of the City's SSF system, and not solely to river turbidity monitoring results. Any adaptive management plan must include the following:

- Monitoring metrics specific to treatment operability (not solely river turbidity),
- Clear, enforceable operational triggers tied to infrastructure protection, and
- Defined response actions when operability thresholds are approached or exceeded.

Specific tools for this purpose should include:

- Operational turbidity and fine sediment thresholds identified in advance of each drawdown that, if reached, preclude the drawdown, require that the drawdown depth be limited, or trigger immediate halting of the drawdown,
- Modified drawdown timing, rate, or sequencing to limit sediment mobilization,
- Sediment management or pretreatment requirements upstream of City water intake, and
- Temporary and potentially permanent suspension of the drawdown during high-risk conditions, including when turbidity levels in the North Santiam River are higher than typical due to storms or other causes.

Implementation of an adaptive management plan with these tools will require continuous **direct** communication and coordination between the Corps and the City of Stayton during any drawdown, and the Final SEIS should identify the importance of such communication to success of the adaptive management tools.

iii. Determine Depth of Each Incremental Drawdown Annually Based on Monitoring of Conditions

The City appreciates that the Corps has recognized that the lack of an incremental approach to drawdowns of the Green Peter Reservoir led to major impacts on the water treatment systems of South Santiam municipalities and that a different approach is warranted for the Detroit Reservoir drawdowns on the North Santiam. However, given that the 2024 drawdown of the Green Peter Reservoir quickly resulted in emergency shutdown conditions for the City of Sweet Home despite the major flushing of accumulated sediment that had occurred during the 2023 drawdown, a rigid and pre-determined drawdown increases the likelihood that the impacts

to the City's water treatment system described above will occur. Instead, the depth of the drawdown should be determined prior to commencement of each drawdown based on annual monitoring of the pool depth, turbidity, and depth and location of newly deposited sediments.

B. Compensatory Mitigation

The most reliable option for avoiding the effect identified above also provides the most certainty: compensatory mitigation. The Final SEIS must identify compensatory measures sufficient to preserve drinking water and municipal water services continuity. Several compensatory measures obviate the need for any avoidance and minimization measures, because they all allow the City to cease water intake from the North Santiam River at the inception of a drawdown. Other compensatory measures ensure that City residences and businesses, and critical City functions, always have water available and allow repair and replacement of the SSF system. Compensatory mitigation measures considered in the Final SEIS should include at least:

- Guaranteed pre-drawdown access to alternative water supplies (e.g., interties to non-affected systems, off-channel storage, ASR),
- Funding or implementation support for construction of pretreatment systems or existing systems' hardening,
- Infrastructure replacement or rehabilitation provisions where damage is unavoidable,
- Emergency response planning and cost recovery mechanisms.

To the extent compensatory mitigation is required, the Corps should delay implementation of the Detroit Reservoir drawdown to 2028 because every option to protect the City of Stayton's municipal water system takes significant time to implement.[5]

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[5] The Corps FEIS and draft SEIS do not mention socioeconomic impacts. Without compensatory mitigation, the damage to the City's SSF system will cause significant indirect socioeconomic impacts. The median income of the City of Stayton residents is approximately $72,000, significantly limiting the ability of the City and its residents to bear the costs associated with damage to its infrastructure or to independently fund provision of clean drinking water during any shutdown of its system.

A failure of the potable water system would have immediate and severe consequences, potentially affect more than 10,000 residents and force the shutdown of businesses across Stayton and Sublimity (Sublimity's wastewater is disposed of through Stayton's wastewater system, which would fail to be operational without a potable water supply). Additionally, critical public safety, healthcare, and other essential facilities would be unable to operate, creating significant risks to public health, safety, and economic stability.

C. The Corps Should Refrain from Issuance of the Final SEIS and Postpone Detroit Reservoir Drawdowns Until Sediment and Turbidity Are Better Understood.

The Draft SEIS notes that the Corps is engaging a sediment transport modeling team to develop tools to inform adaptive management. This modeling will shed light on the magnitude of the initial, cumulative and recurrent effects on municipal water treatment systems that will be caused by the turbidity that will accompany planned annual repetition of the Detroit Reservoir drawdown. Effective adaptive management is critical to prevent loss of use and destruction of treatment infrastructure.

In addition, pursuant to the Water Resources Development Act of 2024, by January 2025, the Corps is expected to complete a report on the turbidity in the Willamette Valley System resulting from recent drawdowns. Given that the report will include analyses of lessons learned, changes in operations based on those lessons, and opportunities to minimize monetary strains on non-federal entities due to drawdown-related turbidity, the City of Stayton and other affected municipalities should be able to review and consider that report as it is highly relevant to the subject matter of these comments.

Thus, finalization of the SEIS and any drawdown of the Detroit Reservoir should be postponed, allowing completion of modeling and the turbidity report, review of results of both by affected parties, and submission of comments on the SEIS considering that information.

The City of Stayton appreciates the Corps' attention to this issue of critical importance to the City, its residents and businesses. Clear identification of the effects of the Detroit Reservoir Drawdown on City infrastructure not only are necessary to identify mitigation options but also to allow the Corps and City to work together to ensure that mitigation is sufficient and workable well in advance of the commencement of a drawdown.

Sincerely,

Julia Hajduk
City Manager

cc.
Brian Quigley City of Stayton, Mayor
Stephen Sims City of Stayton, Council President
Barry Buchanan, P.E. City of Stayton. Interim PWD

From: J&T Rumreich
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Proposed Draw Down of Detroit Reservior
Date: Monday, January 12, 2026 9:29:35 PM
Attachments: Detroit Lake.docx

Please see attached

Willamette District - United States Army Corps of Engineers

To whom it may concern

My name is Tom Rumreich and I'm the executive director of the Oregon Angler Alliance (OAA). We are a group of dedicated Oregonians who promote fish for fisheries because of the benefit to communities and the substantial economic impact that fishing creates. Fishing in Oregon is $1.5 billion a year industry.

On behalf of the OAA, I would like to go on record opposing the plan to draw down Detroit Reservoir to protect Endangered Species Act (ESA) salmonids that pass through the reservoir. That statement may not seem congruent to our mission, but after closely examining the North Santiam River and the invaluable role that Detroit Reservoir plays in the health of that waterway you can understand our position. The North Santiam is certainly one of the most productive stream ecosystems in Western Oregon. Surveys of the macroinvertebrates and the abundance of naturally produced rainbow trout (Oncorhynchus mykiss) are just two indications of a productive stream. The credit to the productive nature of this stream is attributed to Detroit Dam and the management of the summertime water releases. These releases sufficiently augment stream flow - but also substantially keep the temperatures cool enough to promote a myriad of aquatic organisms that provide forage for hundreds of species of animals. Simply put, more water translates to more habitat and more aquatic organisms. Colder water is critical to the proliferation of many native species in Oregon.

For 38 years I had the privilege of working on the South Coast of Oregon in the Salmon Trout Enhancement Program (STEP). One population we took tremendous pride in enhancing was the Coquille River Chinook (*Oncorhynchus tshawytscha).* When we began our restoration efforts in 1981, there were only about 8,000 Chinook in the watershed. In 2010, the population had expanded to over 32,000 fish. Unfortunately, concurrent to our efforts, smallmouth bass (*Micropterus dolomieui*) were illegally introduced into the watershed. In 2020, only ten years later, the population had dropped to only 278. On a global review of an exotic predator's impact on a native species, this is one of the most significant reductions in history.

Smallmouth bass are abundant in the Santiam Watershed. Smallmouth are prevalent in the South and Main Santiam and are not very abundant in the North Santiam River. The spread of smallmouth in the North Santiam is believed to be held in check by the colder water in that river. Few smallmouth have been observed above Greens Bridge on the North Santiam. Fisheries researches have documented that some fish have temperature preferences to 1/100 of a degree Fahrenheit. Portions of the North Santiam have been documented to be 10 degrees cooler than the South or Main Santiam.

The nonnative predatory fish, a large walleye (*Sander vitreus*) was caught in the lower Santiam River in 2025. Yet another nonnative predatory fish that has recently been illegally introduced into the Willamette Watershed is the spotted bass (*Microterus punctulatus).* The impacts of these fish to the

Santiam watershed is not yet known. The colder water in the North Santiam could be that aquatic ecosystems salvation.

As you know, the drawdown of Green Peter Reservoir on the South Santiam caused considerable environmental damage to that river. Green Peter was drawn down over the same concerns with ESA listed salmonid fish passage over the dam. When that reservoir was drawn down, the movement of silt out of the reservoir instantaneously killed thousands of fish. The impact of the silt on spawning riffles in the South Santiam was substantial. The silt fouled many spawning riffles to the point that in-gravel survival of salmonid eggs and fry was compromised. Aquatic microenterprise production was also compromised because the interstitial spaces in the stream substate that these organisms depend on for survival was destroyed for miles of the river. Suspended silt and sand also compromised water quality at South Santiam Hatchery and municipal water systems along the river. The concern is that if Detroit Reservoir is drawn down the same impacts to the stream ecosystem and municipal systems will prevail. The City of Salem and other towns are extremely concerned about not only the availability of water, but the quality of that water as well.

If the lake is drawn down for even short periods of time the prolific population of kokanee (*Oncorhynchus nerka*) that reside in the lake will be compromised. Kokanee provide a substantial fishery that has a substantial economic impact to the local community and to Oregon. A significant number of angler days each year are generated in the pursuit of kokanee and rainbow trout in the lake. The rainbow trout fishery would suffer as well from the current drawdown proposal. To lose these fisheries would not only have an impact on the economy of Oregon, but would also cause a reduction in angling opportunity that would translate to reduced license sales. The Oregon Department of Fish and Wildlife (ODFW) currently is experiencing a budget shortfall. License sales combined with a federal funding match are the cornerstone of ODFW's budget that supports the protections and enhancement of a myriad of fish and wildlife populations throughout Oregon.

The drawdown of Detroit Lake will have a profound effect on the region. The reduction of recreational boating on the lake will create a significant economic hardship. Marinas, stores, restaurants, guides, motels, and dozens of other businesses will suffer from this proposal.

The OAA has been involved with limitations of salmonids in lakes for over four decades. On the south coast our problem has been that the once robust population of coho (*Oncorhynchus kisutch*) in Tenmile Lakes has been reduced to a remnant population because of the illegal introduction of warm-water predatory fish. We have been successful with a series of traps to prevent predation in the lake by removing the coho with a series of traps. In a single season we salvaged 35,000 coho. This same technology could be applied to moving salmonids though or around Detroit Lake.

In summary, the OAA opposes the drawdown of Detroit Lake because of the potential devastating impacts that this strategy will have on the populations of native fish in the North Santiam. We recognize that some ESA listed may be lost by the lack of adequate downstream fish passage at Detroit Dam, but that the compromise of the exceptional aquatic ecosystem facilitated by the dam in the North Santiam far outweighs that loss.

We recognize that in this litigious society the Corps has a great deal of pressure placed on them to comply. There can also be liability if this proposal is counter-productive in providing protection to the North Santiam salmonids residing below the dam.

Those entities that are pressuring the Corps to provide better fish passage at Detroit Dam should realize that to truly protect the native salmonid populations of Oregon, the "court room" is not the best place to serve these invaluable natural resources. The halls of the legislature are the better arena to save these fish by facilitating stricter laws to slow the illegal introductions of non-native predatory fish.

Sincerely

Thomas Rumreich

Executive Director – Oregon Angling Alliance

From:	Julia Hajduk
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Willamettes.eis@usace.army.mil
Subject:	[Non-DoD Source] Stayton Oregon SEIS comments
Date:	Monday, January 12, 2026 4:33:11 PM
Attachments:	image001.png image002.png Stayton Oregon SEIS comments 1-12-26.pdf

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Hello. Please find the City of Stayton's comments on SEIS for the Detroit Dam Drawdown.

Thank you,

Julia

Julia Hajduk
City Manager

362 N. 3rd Ave
Stayton, OR 97383
Phone 503-769-3425

City of Stayton

Administration • Finance
362 N. Third Avenue • Stayton, OR 97383
Phone: (503) 769-3425 • Fax (503) 769-1456

January 12, 2026

By U.S. Mail and E-mail (willametts.eis@usace.arm.mil)

Liz Oliver, Portland District Project Manager
United States Army Corps of Engineers

Attn: CENWP-PME-E / Willamette SEIS
PO Box 2946
Portland, OR 97208-2946

RE: COMMENTS on SUPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (SEIS) DETROIT DAM DEEP DRAWDOWN (DDDD)

Dear Ms. Oliver,

The City of Stayton submits the following comments on the U.S. Army Corps of Engineers' November 2025 Draft Supplemental Environmental Impact Statement ("Draft SEIS") for the operation and maintenance of the Willamette Valley System. The City draws its water from the North Santiam River, downstream of Detroit Reservoir. While the Draft SEIS recognizes adverse impacts to downstream water systems and water quality from a drawdown of the reservoir, it does so generically and vaguely, without any indication that the Corps understands the significant impacts to the City's water treatment systems and ability to provide water to residents and for critical City functions. As a result, the Draft SEIS also fails to identify any mitigation for this effect. The Draft SEIS thus does nothing to reassure the City and its residents that the Corps not only understands that the drawdown of the Detroit Reservoir could destroy millions of dollars of City infrastructure and prevent the delivery of *any* water for personal and municipal uses but intends to ensure that, if the drawdown goes forward, the Corps will ensure that the effects are mitigated.

I. The Draft SEIS Does Not Sufficiently Identify Effects of the Detroit Reservoir Drawdown on City of Stayton Infrastructure & Water Use.

The Draft SEIS generically acknowledges that an effect of the proposed interim operations, including the late fall/early winter deep drawdown at Detroit Reservoir, will be to mobilize fine sediments and result in increased downstream turbidity, with associated effects to water quality and water treatment facilities. However, the Draft SEIS lacks the type of detailed evaluation of this effect that is required and that would allow the Corps to undertake a complete mitigation analysis. For example, the Draft SEIS identifies only increased maintenance and staffing of water treatment facilities and potential, unstated effects on water quality (e.g. at 170, 211). This reflects a lack of understanding that the type of municipal water treatment systems downstream of the Detroit Reservoir differ from those on the South Santiam in meaningful ways that will result in a significant and direct adverse effect on those systems and the communities they supply.

While the Draft SEIS references filtration broadly, it does not mention or evaluate the effect of a drawdown on the use of slow sand filtration (SSF) systems by multiple municipal water purveyors on the North Santiam River. SSF systems differ materially from rapid rate filtration, membrane treatment, or chemically assisted filtration processes (types used by South Santiam municipalities) in both design intent and operational resilience. As a result, generalized treatment references in the Draft SEIS do not adequately or accurately address how the sediment characteristics anticipated under the proposed action would affect SSF systems.

A. SSF Systems are Inherently Vulnerable to Very Fine Suspended Sediments and Elevated Turbidity

SSF systems vulnerability to fine suspended sediments is especially acute when those particles are dominated by silts, clays, colloids, organic fines, or algae. This vulnerability is a direct consequence of how slow sand filters function and where their treatment effectiveness is concentrated.

The primary treatment mechanism of a slow sand filter occurs at the surface biological layer (schmutzdecke) and within the upper ½ inch of the sand bed. Under normal operating conditions, this biologically active layer effectively removes pathogens and low concentrations of particulate matter through a combination of physical straining, adsorption, and biological degradation. However, when raw water contains sustained or episodic high turbidity, especially when dominated by very fine particles, those particles rapidly accumulate at the filter surface for

turbidities greater than 10 NTU.[1] This leads to premature clogging, a sharp increase in headloss, reduced hydraulic capacity, and shortened filter run times.

Very fine sediments are particularly problematic because they:

- Penetrate and compact the sand,
- Are poorly removed by simple sedimentation or hydraulic buffering upstream,
- Can smother or disrupt the schmutzdecke, reducing biological treatment effectiveness,
- Are slow to clear once loading subsides, even after turbidity levels return to baseline.

As turbidity increases, slow sand filters experience a non-linear loss of performance, where small increases in fine sediment loading can result in disproportionate reductions in filter run time and treated water output. This condition often necessitates frequent scraping or removal of the top sand layer, accelerating media loss, increasing labor demands, and reducing overall system reliability.

Once a slow sand filter is cleaned by scraping and the schmutzdecke is removed, the filter temporarily loses its primary fine-particle retention and biological treatment barrier. During this post-cleaning period, particularly if raw water turbidity remains elevated or is dominated by very fine sediments, fine particles penetrate deeper into the sand bed rather than being intercepted at the surface.

This deep bed penetration results in the progressive accumulation of fines within the interstitial pore spaces of the sand matrix, leading to internal clogging that is not readily reversible through surface scraping alone. Therefore, subsequent filter runs become progressively shorter, headloss development accelerates, and cleaning frequency increases – creating a compounding cycle of reduced performance and increased maintenance demand.

Repeated cleaning under these conditions also leads to:

- Accelerated loss of filter media due to frequent removal of the upper sand layers,
- Reduction in effective bed depth and treatment capacity,

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[1] The Corps typically refers to FTU, Formazin Turbidity Units, while modern water treatment relies on NTU (Nephelometric Turbidity Units). FTU is a legacy turbidity unit derived from non-standardized nephelometric measurements, whereas NTU is the current standardized and regulatory unit; such values should not be assumed to be directly interchangeable, and when evaluating turbidity for the purpose of effects on treatment systems, the Corps should utilize NTU consistently.

- Increased risk of fines breakthrough during the filter ripening period before the schmutzdecke is fully re-established,
- Elevated potential for turbidity spikes or particulate passage into finished water, particularly during start-up following maintenance.

Over time, the combination of deep bed fouling, media loss, and shortened ripening periods can compromise both the hydraulic and treatment integrity of the filter, ultimately necessitating partial or full media replacement. These impacts are especially pronounced under conditions of recurring fine sediment loading, such as those associated with reservoir drawdowns, storm-driven watershed disturbance, or prolonged elevated turbidity events.

Accordingly, SSF systems exposed to fine sediment dominated turbidity face a cumulative degradation of performance, rather than isolated operational challenges, reinforcing the need for effective pretreatment, conservative operational thresholds, and alternative treatment or supply strategies during high-risk raw water conditions.

SSF systems are therefore best suited to consistently low-turbidity source waters with limited fine sediment variability. They are not resilient to highly variable or storm-driven turbidity events, nor to conditions involving reservoir drawdowns, watershed disturbances, or algal and organic fines. Without adequate upstream pretreatment such as roughing-filters, bank filtration, off-stream storage, or advanced pretreatment processes, SSF systems face a heightened risk of operational failure during fine sediment loading events.

In summary, **SSF systems are operationally fragile when exposed to very fine sediments and elevated turbidity**, making source-water protection, pretreatment, and conservative operational thresholds critical to maintaining compliance and system reliability.

Recent operability testing and system evaluations conducted by the City of Salem to evaluate the effect of higher turbidity on its slow sand filters indicate that sustained fine sediment–dominated and high turbidity conditions comparable to those anticipated during deep drawdown operations would rapidly compromise the operability of direct online SSF systems. Such conditions are expected to result in accelerated surface clogging, deep bed penetration of fine materials following cleaning, shortened filter run times, loss of effective biological treatment capacity, and heightened risk of particulate breakthrough during filter ripening. These outcomes would likely render continuous operation of SSF systems unsustainable over a very short operational period without alternative supply activation or substantial pretreatment. Unlike the City of Salem, which utilizes some pre-treatment that may reduce turbidity or the percentage of finer sediment particles, the City of Stayton utilizes a direct online SSF system. Direct online SSF systems receive "raw" water directly from the running river. Thus, Stayton's water treatment infrastructure is at even greater risk of turbidity-related impacts from the Detroit Reservoir drawdown than the City of Salem.

The impacts described herein do not constitute a mere issue of temporary exceedance of drinking water quality standards or treatability. Rather, the projected fine sediment–dominated turbidity conditions associated with the Detroit Reservoir drawdown present a material risk of physical and functional destruction of critical drinking water treatment infrastructure.[2]

Under sustained or recurring fine sediment loading, SSF systems are subject to irreversible or near-irreversible operational failure mechanisms, including deep bed fouling, accelerated and unrecoverable media loss, collapse of biological treatment function, and structural degradation of the filter bed. These impacts are not correctable through standard operational adjustments or short-term compliance measures and extend beyond the scope of conventional drinking water standards enforcement or treatment optimization.

As a result, the foreseeable consequence of the Detroit Reservoir drawdown is not merely degraded water quality or the need for increased staffing or maintenance, but the inability of affected municipal water systems to operate at all, leading to a cessation of potable water production. This would directly impair the provision of water for essential municipal purposes, including residential supply, fire protection, public health and sanitation, and other critical community functions. Once such infrastructure failure occurs, service cannot be restored without substantial reconstruction, extended outages, and reliance on alternative water supplies.

Accordingly, this effect must also be evaluated as an infrastructure impairment and service continuity risk, rather than only a drinking water standards or maintenance cost issue. Failure to do so will result in understatement of the severity of reasonably foreseeable effect, mischaracterize the nature of the harm, and preclude informed decision-making regarding avoidance, minimization, and compensation measures necessary to protect public health and essential municipal services.

B. Necessary Revisions to the Draft SEIS to Fully Analyze Impacts

The FEIS and Draft SIES do not sufficiently identify and analyze impacts to communities and infrastructure anticipated to result from the Detroit Reservoir drawdown. Considering the high risk that the proposed interim operations will cause physical and functional destruction of the City of Stayton's drinking water treatment infrastructure, rather than merely temporary drinking water standards exceedances, the City respectfully requests that the Final SEIS include

[2] This contrasts with the types of water treatment systems used by municipalities on the South Santiam River, which while degraded in effectiveness and life span during the 2023 and 2024 Green Peter drawdown, were not functionally destroyed.

the following analysis to ensure full understanding, informed decision-making, and protection of essential municipal services.

a. Explicit Identification of Vulnerable Treatment Infrastructure

The Final SEIS should explicitly identify the presence of SSF municipal drinking water treatment systems and, more explicitly, direct online SSF systems, downstream of Detroit Dam and acknowledge that these systems are inherently vulnerable to fine sediment–dominated and sustained high turbidity conditions to a degree not experienced by other types of treatments systems, including those on the South Santiam River.

b. Treatment- and Infrastructure-Specific Impact Analysis

The Final SEIS should evaluate treatment-process-level impacts, not solely source-water quality changes, including:

- Deep-bed penetration of fine sediments following filter cleaning,
- Accelerated and unrecoverable filter media loss,
- Collapse of biological treatment function,
- Compounding maintenance and cleaning requirements,
- Risk of particulate and turbidity breakthrough during filter ripening, and
- The potential for complete loss of treatment operability over even short drawdown periods.

The Draft SEIS recognizes that there will be a "moderate increase in sediment and turbidity levels downstream of Detroit Reservoir." (ES-9). However, nothing in the draft indicates the meaning of moderate in this context or The Final SEIS cannot reasonably compare alternatives without a clear recognition and understanding of the vulnerabilities of water-treatment systems downstream of Detroit Reservoir.

The Final SEIS should explicitly assess the risk that the proposed drawdown of the Detroit reservoir would result in physical impairment or destruction of the City's treatment infrastructure, leading to the **cessation of potable water production**, rather than only temporary noncompliance with drinking water standards. This assessment should address impacts to:

- Residential water supply,
- Fire protection and emergency response,
- Public health and sanitation,
- Other essential municipal and community functions.

c. Cumulative and Recurrent Impacts Analysis

Because the Detroit Reservoir drawdown is an action planned to be repeated at least annually, the Final SEIS should analyze the cumulative effects of recurring or multi-year drawdown-related turbidity events on SSF systems, including progressive degradation, loss of remaining useful life, and the increasing likelihood of permanent infrastructure failure over the interim operations period.

This analysis is particularly important given that, even after a significant 2023 drawdown that caused massive turbidity increases in the South Santiam River, during the 2024 drawdown, the City of Sweet Home again experienced such significant turbidity that its drinking water treatment system struggled, and a state of emergency was declared. The Corps' use of adaptive management to mitigate effects of the drawdown by immediately ceasing the interim operation to prevent further harm to the City of Sweet Home is laudable. However, considering that experience, it is concerning that the SEIS does not fully evaluate the effects of a 2025 Detroit Reservoir drawdown on downstream municipal water systems, and in particular SSF systems which are much more sensitive to turbidity and fines than those on the South Santiam.

II. The Draft SEIS Fails to Identify Mitigation Measures for Water Treatment & Infrastructure Impacts.

If the Corps determines that the proposed action will occur despite the high risk of major impacts to the City of Stayton, the Corps must identify and describe options for avoiding and minimizing the impacts in the Final SEIS. Given the significance of the risk, the Corps also should identify compensatory mitigation options to be implemented either as alternatives to avoidance and minimization, or because of effects on City infrastructure despite efforts to avoid and minimize them.

While the Draft SEIS indicates that an "Emergency Response and Communications Plan" will be utilized, it does not identify what that plan will cover, how and when it will be developed, and whether stakeholders, including the City of Stayton, will provide input on its development.[3] The mere indication that an undefined "plan" will be used by the Corp does not satisfy the requirement to identify mitigation options.[4]

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[3] To the extent such a plan already exists for the Detroit Drawdown, the City has not found it in the FEIS, Draft SEIS, ROD or on the Corps' website.

[4] The Corps' April 2025 Final Environmental Impact Statement for the Willamette Valley System Operations and Maintenance barely acknowledge impacts to community water systems and does not even mention mitigation for such impacts, much less an emergency communication plan, despite being published after the adverse effects of the 2023 and 2024 Green Peter Reservoir drawdowns were known.

A. Avoidance and Minimization Measures

Avoidance and minimization options necessary to prevent infrastructure damage should include, but are not limited to the following practices and limitations:

i. Turbidity Monitoring – Location and Particle Size

The location at which turbidity is monitored during a drawdown of the Detroit reservoir is critical to the meaningful protection of downstream drinking water treatment infrastructure. The draft SEIS identified the turbidity monitoring location as Niagara, i.e. after release of water from the Detroit dam. Turbidity monitoring conducted at Niagara or below spillway and outlet releases is inherently insufficient for operational decision-making because it detects sediment conditions after fine materials have already been entrained, mixed, and irreversibly released downstream.

Fine sediment–dominated turbidity, particularly silts, clays, colloidal particles, and organic fines, behaves fundamentally differently from coarser suspended material. These fine particles remain in suspension for extended periods, are not effectively attenuated once mobilized, and can penetrate deep into SSF beds once introduced into downstream treatment systems. Detection of elevated turbidity at a post-spillway or downstream monitoring location therefore occurs too late to prevent infrastructure damage or operational failure, as the sediment pulse has already entered the river system and is no longer controllable.

To be operationally meaningful, **turbidity monitoring must be conducted in-pool and upstream of release structures, where sediment mobilization can be detected prior to discharge** and where adaptive management actions—such as modifying drawdown rates, suspending the drawdown, or activating alternative operations—remain feasible. In-pool monitoring provides early indication of fine sediment entrainment, including the mobilization of legacy sediments exposed during drawdown, which are most likely to produce the fine particle size fractions that pose the greatest risk to SSF systems.

Reliance on post-spillway turbidity monitoring conflates impact confirmation with impact prevention and fails to account for the time lag between sediment mobilization, downstream transport, and treatment system exposure. Because SSF systems are vulnerable to rapid and irreversible degradation once fine sediment enters the treatment process, monitoring that occurs after release does not provide a practicable opportunity to avoid infrastructure damage or service interruption. The Final SEIS's identification of mitigation options must acknowledge that monitoring limited to post-spillway or downstream locations is insufficient for infrastructure protection and shall not be relied upon as the sole basis for operational decision-making.

Accordingly, to satisfy NEPA's requirement for meaningful impact disclosure and mitigation, turbidity monitoring associated with interim operations must be relocated or supplemented with in-pool, upstream monitoring points specifically designed to detect fine sediment mobilization before discharge. Without such monitoring, the proposed operations lack

an effective mechanism to prevent foreseeable infrastructure destruction and cessation of drinking water service in the City of Stayton.

ii. Adaptive Management and Triggered Operational Responses

The Final FEIS should articulate the components of an adaptive management plan aimed at avoiding and minimizing any effects on the City's infrastructure and ability to provide water for standard uses. Adaptive management for mitigation must include metrics and actions tied to the operational parameters and real-time status of the City's SSF system, and not solely to river turbidity monitoring results. Any adaptive management plan must include the following:

- Monitoring metrics specific to treatment operability (not solely river turbidity),
- Clear, enforceable operational triggers tied to infrastructure protection, and
- Defined response actions when operability thresholds are approached or exceeded.

Specific tools for this purpose should include:

- Operational turbidity and fine sediment thresholds identified in advance of each drawdown that, if reached, preclude the drawdown, require that the drawdown depth be limited, or trigger immediate halting of the drawdown,
- Modified drawdown timing, rate, or sequencing to limit sediment mobilization,
- Sediment management or pretreatment requirements upstream of City water intake, and
- Temporary and potentially permanent suspension of the drawdown during high-risk conditions, including when turbidity levels in the North Santiam River are higher than typical due to storms or other causes.

Implementation of an adaptive management plan with these tools will require continuous **direct** communication and coordination between the Corps and the City of Stayton during any drawdown, and the Final SEIS should identify the importance of such communication to success of the adaptive management tools.

iii. Determine Depth of Each Incremental Drawdown Annually Based on Monitoring of Conditions

The City appreciates that the Corps has recognized that the lack of an incremental approach to drawdowns of the Green Peter Reservoir led to major impacts on the water treatment systems of South Santiam municipalities and that a different approach is warranted for the Detroit Reservoir drawdowns on the North Santiam. However, given that the 2024 drawdown of the Green Peter Reservoir quickly resulted in emergency shutdown conditions for the City of Sweet Home despite the major flushing of accumulated sediment that had occurred during the 2023 drawdown, a rigid and pre-determined drawdown increases the likelihood that the impacts

to the City's water treatment system described above will occur. Instead, the depth of the drawdown should be determined prior to commencement of each drawdown based on annual monitoring of the pool depth, turbidity, and depth and location of newly deposited sediments.

B. Compensatory Mitigation

The most reliable option for avoiding the effect identified above also provides the most certainty: compensatory mitigation. The Final SEIS must identify compensatory measures sufficient to preserve drinking water and municipal water services continuity. Several compensatory measures obviate the need for any avoidance and minimization measures, because they all allow the City to cease water intake from the North Santiam River at the inception of a drawdown. Other compensatory measures ensure that City residences and businesses, and critical City functions, always have water available and allow repair and replacement of the SSF system. Compensatory mitigation measures considered in the Final SEIS should include at least:

- Guaranteed pre-drawdown access to alternative water supplies (e.g., interties to non-affected systems, off-channel storage, ASR),
- Funding or implementation support for construction of pretreatment systems or existing systems' hardening,
- Infrastructure replacement or rehabilitation provisions where damage is unavoidable,
- Emergency response planning and cost recovery mechanisms.

To the extent compensatory mitigation is required, the Corps should delay implementation of the Detroit Reservoir drawdown to 2028 because every option to protect the City of Stayton's municipal water system takes significant time to implement.[5]

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[5] The Corps FEIS and draft SEIS do not mention socioeconomic impacts. Without compensatory mitigation, the damage to the City's SSF system will cause significant indirect socioeconomic impacts. The median income of the City of Stayton residents is approximately $72,000, significantly limiting the ability of the City and its residents to bear the costs associated with damage to its infrastructure or to independently fund provision of clean drinking water during any shutdown of its system.

A failure of the potable water system would have immediate and severe consequences, potentially affect more than 10,000 residents and force the shutdown of businesses across Stayton and Sublimity (Sublimity's wastewater is disposed of through Stayton's wastewater system, which would fail to be operational without a potable water supply). Additionally, critical public safety, healthcare, and other essential facilities would be unable to operate, creating significant risks to public health, safety, and economic stability.

C. The Corps Should Refrain from Issuance of the Final SEIS and Postpone Detroit Reservoir Drawdowns Until Sediment and Turbidity Are Better Understood.

The Draft SEIS notes that the Corps is engaging a sediment transport modeling team to develop tools to inform adaptive management. This modeling will shed light on the magnitude of the initial, cumulative and recurrent effects on municipal water treatment systems that will be caused by the turbidity that will accompany planned annual repetition of the Detroit Reservoir drawdown. Effective adaptive management is critical to prevent loss of use and destruction of treatment infrastructure.

In addition, pursuant to the Water Resources Development Act of 2024, by January 2025, the Corps is expected to complete a report on the turbidity in the Willamette Valley System resulting from recent drawdowns. Given that the report will include analyses of lessons learned, changes in operations based on those lessons, and opportunities to minimize monetary strains on non-federal entities due to drawdown-related turbidity, the City of Stayton and other affected municipalities should be able to review and consider that report as it is highly relevant to the subject matter of these comments.

Thus, finalization of the SEIS and any drawdown of the Detroit Reservoir should be postponed, allowing completion of modeling and the turbidity report, review of results of both by affected parties, and submission of comments on the SEIS considering that information.

The City of Stayton appreciates the Corps' attention to this issue of critical importance to the City, its residents and businesses. Clear identification of the effects of the Detroit Reservoir Drawdown on City infrastructure not only are necessary to identify mitigation options but also to allow the Corps and City to work together to ensure that mitigation is sufficient and workable well in advance of the commencement of a drawdown.

Sincerely,

Julia Hajduk
City Manager

cc.
Brian Quigley City of Stayton, Mayor
Stephen Sims City of Stayton, Council President
Barry Buchanan, P.E. City of Stayton. Interim PWD

From:	Jennifer Fairbrother
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Laurie Rule
Subject:	[Non-DoD Source] NFS Comments on Draft SEIS for WVS
Date:	Monday, January 12, 2026 11:07:11 AM
Attachments:	FINAL Willamette SEIS - NFS Comments.pdf

Dear Col. Caswell, Jr.,

Attached are comments on behalf of Native Fish Society regarding the draft supplemental environmental impact statement for the Willamette Valley system.

Thank you for this opportunity to provide comments. Cheers,

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.

January 5, 2025

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 submits these comments in response to the comment period for the Willamette Valley System (WVS) draft Supplemental Environmental Impact Statement (SEIS). These comments are in addition to our comments submitted in February 2023 on the draft Environmental Impact Statement (DEIS). As an organization 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 National Environmental Policy Act (NEPA) process presents a critical opportunity to evaluate operational and structural modifications that prioritize fish recovery consistent with the Endangered Species Act (ESA), Congressional directives, 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.

General Comments

1. Inadequate Process and Insufficient Alternatives: A Request for Meaningful Engagement

The SEIS was developed under an unreasonably compressed timeline that has compromised meaningful public participation and coordination with tribal and inter-agency partners. By presenting the structure of "Alternative 6" before the public scoping period even began, the Corps signaled that the alternative was effectively predetermined and that stakeholder input would receive minimal consideration. Consequently, the resulting alternative is insufficient, narrowly tailored, and fails to meet the Congressional intent behind the Water Resources Development Acts (WRDA) of 2020, 2022, and 2024. These statutory directives were intended to ensure a comprehensive analysis of all reasonable operational and infrastructural measures to recover threatened fish populations—not just a single, flawed option.

Instead of collaborating in good faith, the Corps has presented a regulatory "straw man" designed to fail. Alternative 6 creates a false dilemma, forcing decision-makers and the public to choose between the draft EIS' preferred alternative or a structurally detrimental, $3+ billion alternative that the SEIS admits will cause high mortality for fish and fail to meet water quality needs. This approach withholds the critical information necessary for informed decision-making and deprives federal and state agencies, tribes, Congress, and the public of an honest discussion about the full suite of options available if commercial hydropower is eliminated.

While immediate action to stem the decline of listed species is vital, the recently published 2024 Biological Opinion and interim Record of Decision already provide the necessary framework for near-term measures. This allows the Corps the necessary time to get this long-term analysis done correctly.

We therefore request that the Corps immediately convene stakeholders, cooperating agencies, and Tribal Nations to co-design additional, truly comprehensive alternatives. This analysis must assess the full spectrum of technical possibilities, including options that eliminate commercial hydropower without requiring the complete removal of infrastructure, or that eliminate it at some dams but not others. We urge the Corps to engage in this work collaboratively to foster a shared understanding and build reasonable confidence in the path forward for our fish, rivers, and communities.

2. WRDA 2024 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 Congressional intent behind the Water Resources Development Acts of 2020, 2022, and 2024.[1]

The Corps' refusal to update the "Purpose and Need" statement to accommodate this analysis—citing the "efficiency" mandates of the Fiscal Responsibility Act (FRA)—is a legal error. The specific statutory mandate of WRDA 2024 to analyze ceasing hydropower "notwithstanding hydropower being an authorized purpose" overrides general administrative goals for efficiency.

In legal statutory construction, 'notwithstanding' functions as a directive to disregard the conflicting requirement. Congress explicitly instructed the Corps to set aside the authorized purpose of hydropower for the scope of this analysis.

By refusing to update the 'Purpose and Need' statement to reflect this directive, the Corps is using the very constraint (the authorized purpose) that Congress expressly told them to override. The result is an analysis that fails from the outset, as Alternative 6 is tethered to an outdated Purpose and Need statement it cannot possibly meet.

3. 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 not 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.[2]

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.[3] 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.[4]

Because of the Corps' management discretion, the agency must operate dams in the Willamette System in compliance with the ESA's no-jeopardy and no-take mandates, 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.[5]

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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] *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).

[3] *See NWF v. NMFS*, 524 F.3d at 928-29.

[4] *Id.* at 929 n. 8

[5] *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.[6]

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.[7] 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.

Alternative operations, like extended draw downs, may provide alternative recreational opportunities that previously did not exist at these sites, such as opportunities to fish streams recreated during drawdowns in reservoir lakebeds.[8]

Finally, even if the Corps asserts it lacks the current authority to conduct certain operations or make improvements to protect ESA-listed fish, it retains the obligation to seek that authorization from Congress.

4. The Corps' Alternative 6 Falls Short of What Congress Intended

By analyzing only one "no-hydropower" alternative, the Corps has limited the public's ability to understand what's truly possible for fish recovery. Alternative 6 removes all hydropower infrastructure but keeps the same costly and likely ineffective fish-collection facilities from the draft EIS' preferred alternative. This narrowly defined option does not reflect the full range of options Congress expected when it required the Corps to study ending commercial hydropower in the Willamette system.

What's missing is a dam-by-dam analysis of other viable approaches—such as leaving hydropower infrastructure in place but no longer generating commercial power. Without these options,

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[6] 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).

[7] *See* supra p. 4; Flood Control Act of 1950, Pub L. No. 81-516, § 204, 64 Stat. 163, 178-79 (1950).

[8] Urness, Z. (2025, December 5). Trout fishing hot in Oregon river that only forms for a few weeks. *Statesman Journal.* https://www.statesmanjournal.com/story/travel/outdoors/2025/12/05/trout-fishing-lookout-point-drawdown-oregon-new-river/87592254007/

decision-makers and the public don't have the information needed to choose a plan that will actually help native fish recover.

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:

a. **Volitional downstream passage** during as much of the year as possible, with particular emphasis on fall through spring periods critical for juvenile salmonid outmigration.

b. **Maximum operational flexibility** that does not require adherence to existing refill rule curves and that can account for changing precipitation patterns and temperature regimes. Specifically, analysis should consider what operations are available when the constraint of maintaining the power pool is eliminated.

5. The Flawed Definition Of Ceasing Commercial Hydropower: Analyzing Non-Destructive Alternatives

The DSEIS defines "Ceasing Federal Hydropower" as the total removal of turbines and the installation of cone valves to dissipate energy. The Corps then concludes that this configuration would result in *worse* outcomes for fish due to high mortality rates through these valves and increased Total Dissolved Gas (TDG).

This is a manufacturing defect in the alternative. Ceasing *commercial* hydropower does not require the physical removal of turbines or the installation of lethal valves. Other options that should be addressed include:

1. **Non-generating Operations:** Maintaining the existing hydropower infrastructure but only operating as necessary to improve water quality, maintain dam safety, and provide for dam maintenance needs.

   Analysis of alternative operations should include extended drawdowns like what is proposed for Cougar Dam and reservoir in the draft EIS Preferred Alternative and incorporated into the 2024 Biological Opinion.

2. **Alternative turbine configurations to improve fish passage survival:** The Corps failed to analyze the use of "fish-friendly" infrastructure like alternative turbine designs, such as the fixed-blade designs successfully installed by the Corps at Ice Harbor Dam (achieving ~98% juvenile survival). The Corps should consider the ability to design similar turbines for the Willamette's high-head dams and the cost and impacts to fish recovery of using alternative

turbine designs as opposed to the cost of unproven fish collection facilities for downstream passage.

The Corps also did not explore possible alterations to penstock routes that could dissipate energy without the use of cone valves. For instance, the Corps discussed in the examples of fish passage infrastructure at Green Peter in which extended horizontal runs enable the dissipation of the hydraulic energy to enable fish passage.[9]

By failing to analyze any alternative options to full removal of the turbine infrastructure, the Corps has chosen an alternative that maximizes cost and fish mortality merely to justify rejecting the concept of ceasing commercial hydropower.

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:

- Permanently or seasonally lowering reservoirs to within 20-50 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[10]
- 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

[9] **USACE Portland.** (2025, November 21). *Willamette Valley System Draft Supplemental EIS Public Meeting – Nov. 19, 2025 - Evening Session* [Video]. YouTube. https://www.youtube.com/watch?v=RyrjPIUFhz8
[10] Water Resources Development Act of 2020, Pub. L. No. 116-260, § 402(d) (2020).

3. 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 should 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
- Operate without power-peaking flows
- 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)

4. 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

Lookout Point Dam: The 2024 BiOp RPA states that the Corps should monitor the interim downstream passage measures before deciding to proceed with an unproven fish passage structure. The Corps should analyze enhanced alternative downstream passage operations (see point 1 of this section) that could be conducted if commercial power production is eliminated.

5. Flexible Reservoir and Flow Management

The SEIS should analyze operational flexibility that does not mandate adherence to static rule curves, including consideration of:

- Alternatives that do not include the constraints of maintaining a power pool
- 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

6. Climate Change Integration

We found that the analysis in the draft 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.

To be clear, we are not referring to the impact of the alternatives on climate change, but rather the impact of climate change on the effectiveness of the alternatives.

Strong Support for the Deep Drawdown at Detroit Reservoir

Native Fish Society strongly supports the Corps' proposal to implement a deep drawdown of Detroit Reservoir each fall/winter to facilitate downstream passage for juvenile fish. As highlighted in the SEIS, this operation is one of the most effective tools available to help endangered Upper Willamette River spring Chinook and winter steelhead survive their migration to the ocean. Executing this drawdown is also a component of meeting the Reasonable and Prudent Alternative under the 2024 Biological Opinion for the WVS.

We specifically endorse the Corps' proposed three-year phased approach to reaching the target drawdown elevation. This stepwise strategy is a reasonable adaptive management method to manage the mobilization of reservoir sediments, thereby reducing acute impacts to downstream water quality and municipal water supplies while still achieving fish passage goals.

We urge the Corps to prioritize this measure as a consistent, annual practice and refine the operation using real-time monitoring, adaptive management, and the best available science.

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. Substantive no-commercial hydropower alternatives 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 a suite of alternatives serious consideration and robust analysis in the SEIS. A one size fits all approach for this alternative is not sufficient. The Corps should undertake a dam by dam analysis to determine the best overall scenario for fish while still meeting the other

authorized purposes of the WVS. The comprehensive analysis requested in this letter is essential, as the future of iconic Pacific Northwest salmon and steelhead runs may well depend on it.

Sincerely,

Jennifer Fairbrother
Legislative & Policy Director

From:	James Adkins
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Mark Hutchinson
Subject:	[Non-DoD Source] CENWP-PME-E / Willamette EIS Comments from Association of Northwest Steelheaders
Date:	Monday, January 12, 2026 9:43:50 AM
Attachments:	CENWP-PME-E.Willamette EIS.ANWS.pdf

Please accept the following comments on behalf of the Association of Northwest Steelheaders.

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946 Portland, OR 97208-2946

January 12, 2026

Dear U.S. Army Corps of Engineers,

On behalf of the Association of Northwest Steelheaders(ANWS), thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Willamette Valley System.

Since 1960, The Association of Northwest Steelheaders has represented anglers, conservationists, and community members who are deeply invested in the recovery of wild salmon and steelhead and the preservation of Oregon's recreational fishing heritage. We urge the Corps to prioritize actions that ensure safe passage for Endangered Species Act–listed fish, maintain existing recreational fishing opportunities, and minimize impacts to downstream water quality, fish habitat and flood protection.

Prioritize Safe Passage for ESA-Listed Fish

ANWS strongly supports operational changes that meaningfully improve survival for juvenile salmon and steelhead migrating downstream. We support the implementation of an annual fall deep drawdown at Detroit Reservoir as required by the National Marine Fisheries Service Biological Opinion. Deep drawdowns are among the most effective and cost-efficient tools available to improve fish passage without compromising the primary flood-control purpose of the dams.

The USACE proposed phased, multi-year approach to deepening the drawdown reflects a responsible effort to reduce sediment and water-quality impacts downstream while still providing critical migration benefits for ESA-listed species. We encourage the Corps to commit to this measure as a consistent annual operation and to continue refining it based on data to support fish survivability passing the dams and Willamette project area.

The water released from the dams should coincide with timing of the downstream migrating smolts and protect the upstream migrating salmon from temperature shock before they reach the dams. The timing of releases should also be coupled with limiting irrigation draws until after June, based on NMFS and scientific papers published by Oregon State.

With the water released the fish must have a way to safely pass the dams. As we saw with the Green Peter drawdowns over 99% of the fish passing the dam died. The Draft SEIS does not fully examine the range of options that become available if commercial hydropower is removed from Willamette Valley dams. Since Congress has required the Corps to analyze a "no hydropower" alternative, the final SEIS should explore more than

one narrow version.

On both the Clackamas River and Deschutes River PGE has retrofitted the dams with new fish passage on the old dams. It's time the Army Corps updated its dams to current standards and not apply a one size fits all solution.

Limiting hydropower and irrigation during times of flushing fish downstream through new pathways could provide a balanced approach, when considered with the basin size, storage and power generation.

Preserve Existing Recreational Fishing Opportunities

Recreational fisheries are a cornerstone of Oregon's outdoor economy and cultural identity. Decisions made in the Final SEIS will directly affect angling opportunities at Detroit reservoir and beyond. ANWS urges the Corps to preserve existing fisheries that have been established through major public taxpayer dollar investments such as the planted kokanee and trout populations.

Minimize Impacts Downstream

We also emphasize the importance of protecting downstream communities that depend on the Santiam River for clean drinking water, as well as dam operations for public safety/flood risk management. Operational changes, including deep drawdowns, must continue to be implemented in a manner that safeguards water quality, manages sediment responsibly, and maintains flood-control reliability.

System Wide Habitat Improvements

Drawdown coupled with river restoration projects to provide habitat for downstream migrating smolts is necessary. The dams prevent woody debris, gravels and natural river meandering which allows the few smolts that do pass the dams to survive before reaching the ocean. In addition to many ESA-listed anadromous species also rely on downstream portions of the Santiam and Willamette River for habitat for spawning, rearing and general protection from predators.

A transparent, science-based approach that balances fish recovery with downstream community needs is essential to maintaining public trust and achieving durable solutions. The USACE has funded these types of projects on a limited basis before. We suggest increased subsidies for riverbank owners, and robust funding for these relatively cheap projects until concrete and steel changes can be made for fish passage around the dams. This measure will also help to remove sediment, and downstream erosion.

Hydropower Decommissioning

Finally, Congress directed the USACE to evaluate a broad range of options, and we urge a dam-by-dam analysis that explores additional operational scenarios, including alternatives that cease commercial hydropower generation while avoiding unnecessary infrastructure removal.

Expanding the scope of analysis will provide decision-makers, Tribal governments, and the public with the information necessary to identify solutions that best meet ESA obligations, reduce taxpayer costs, and achieve meaningful fish recovery.

Conclusion

The Association of Northwest Steelheaders respectfully urges the USACE to produce a

Final SEIS that prioritizes safe passage for ESA-listed salmon and steelhead, preserves existing recreational fishing opportunities, and enhances downstream habitat, water quality and public safety. With thoughtful operational changes, downstream restoration, and state of the art fish passage structures the Willamette Valley System better fulfill its flood-control mission while supporting healthy rivers, resilient communities, and thriving fisheries.

Thank you for considering our comments and for your continued engagement on this critical issue.

Sincerely,

Mark W. Hutchinson, PE
Association of Northwest Steelheaders

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James Adkins

Executive Director

Association of NW Steelheaders

503-428-2618

james@anws.org

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Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946 Portland, OR 97208-2946

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Thank you for considering our comments and for your continued engagement on this critical issue.

Sincerely,

Mark W. Hutchinson, PE
Association of Northwest Steelheaders

From: Jerry Drum
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Lake Drawdown
Date: Saturday, January 10, 2026 5:41:01 AM
Attachments: Detroit ACOE Letter.pdf

Please see attached letter.
Thank you,
Jerry Drum

To the Army Corp of Engineers,

Thank you for the opportunity to comment. I also appreciate the informative and interactive meetings that have been held and the extension of the public comment period.

As a 1993 transplant to Oregon, I feel this is my home and I am an Oregonian at heart. I am deeply concerned about the Deep Drawdown proposal and the potential impacts it could have on the community—specifically regarding the existing kokanee fishery, tourism, summer recreational activities, and water quality for local municipalities and communities.

I work in the City of Albany and have been involved in that community since 1998. I have seen firsthand the impacts the Green Peter drawdown has had on many fronts. While I understand that action was mandated by a court order, it is critical that we learn from that experience to prevent unintended consequences and mitigate impacts through scientific, data-driven analysis.

Below are my primary concerns:
1) Impacts to local fisheries
a. The kokanee population at Green Peter was devastated by the drawdown. While I understand kokanee are not a native species, they support a highly popular and productive fishery at Detroit Lake. During the spring and summer months, the lake attracts hundreds of anglers enjoying time with friends and family while teaching the next generation how to fish.

This fishery not only provides recreational value but also significantly supports tourism and the local economy. A clear plan is needed to preserve this valuable kokanee fishery while balancing efforts to improve endangered salmon survival. To date, I have not heard a quantified estimate of kokanee losses resulting from a deep drawdown—only that there will be “an impact.”

b. Available data appears limited or incomplete regarding salmon returns in the South Santiam River. A decision of this magnitude should not be made without additional information. As this is only the third year of drawdowns at Green Peter, there has not been sufficient time or evidence to demonstrate meaningful changes in salmon return rates.

2) Summer recreation
a. While it has been stated that a deep drawdown should not impact water levels during peak summer recreation months, I remain unconvinced. I would like to better understand how the Corps plans to manage spring water levels to prevent recreational impacts. As recently as the 2025 season, Detroit Lake did not reach the revised full pool elevation of 1,558.5 feet. Although 2025 was not classified as a dry year, lower-than-normal spring rainfall still resulted in reduced water levels. With an additional drawdown of approximately 50 feet, I am concerned there will be more years when the lake fails to reach full pool. This would further strain the local community through lost tourism, reduced lake access, and potential impacts to downstream agricultural water needs.

Additionally, I did not hear any updates regarding the revised full pool elevation of 1,558.5 feet

or whether there are plans to return to the previous full pool elevation of 1,562.5 feet. Has the impact of recent wildfires—particularly their effects on snow retention and runoff—been evaluated and accounted for in spring water retention planning?

3) Impacts to local municipalities
a. The deep-water drawdown at Green Peter significantly impacted downstream water treatment facilities, resulting in severe turbidity and degraded water quality. More data, time, and funding are necessary to allow downstream municipalities to adequately prepare for similar consequences associated with a deep-water drawdown at Detroit.

In closing, I respectfully recommend canceling or delaying the proposed deep-water drawdown until additional data is available to support a truly data-driven path forward, or until alternative, feasible solutions are developed. While the protection and recovery of endangered salmon is critically important, these decisions must be made carefully and with full consideration of their broader impacts to communities, ecosystems, and economies.

Thank you for your time and consideration.

Jerry Drum
2855 Foxhaven Dr SE
Salem, Oregon 97306
503-409-0708

From:	Traci Archer
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Greg Benthin; Gary Crum
Subject:	[Non-DoD Source] RE: USACE, Portland District extends public comment period on the WVS Draft Supplemental EIS
Date:	Friday, January 9, 2026 11:39:36 AM
Attachments:	Detroit Reservoir Deep Drawdown.pdf

Hello,

Please consider the attached letter from the City of Gates regarding the Deep Drawdown of the Detroit Reservoir.

Thank you

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.

From: CENWP-PME-Williamette-Valley-System-EIS [mailto:willamette.eis@usace.army.mil]
Sent: Thursday, December 11, 2025 11:53 AM
Subject: USACE, Portland District extends public comment period on the WVS Draft Supplemental EIS

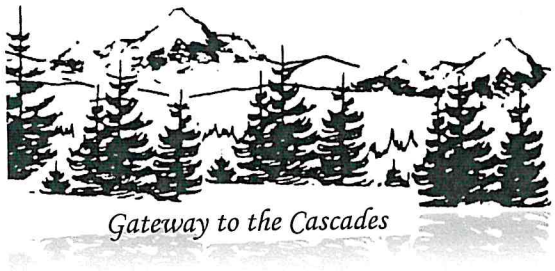
The U.S. Army Corps of Engineers, Portland District is extending the public comment period to **January 13, 2026** for the Willamette Valley System Operation and Maintenance Draft Supplemental Environmental Impact Statement.

Comments on the draft SEIS must be submitted in written form and can be submitted via this email or to the USACE address below.

USACE will hold an additional public meeting in Stayton on Tuesday December 16 at 6pm at the Stayton Community Center, 400 W Virginia St. Stayton, OR 97383.

https://www.nwp.usace.army.mil/Media/News-Releases/Article/4357477/public-comment-period-extended-additional-public-info-session-added-for-detroit/

U.S. Army Corps of Engineers, Portland District
P.O. Box 2946
Portland, OR 97208-2946



City of Gates
101 Sorbin Ave. W, Gates, OR 97346
ph. 503.897.2669 ctygtes@wbcable.net
https://www.cityofgates.com

Date: 01/09/2026

To: U.S. Army Corps of Engineers, Portland District
P.O. Box 2946
Portland, OR 97208-2946

Attn: Project Management Office

From: City of Gates
101 Sorbin Avenue W
Gates, OR 97346

Subject: Potential Adverse Effects of Detroit Reservoir Deep Drawdown on the City of Gates Water Supply

Dear Army Corps Officials,

The City of Gates is writing to formally address significant concerns regarding the proposed deep drawdown of Detroit Reservoir. As a municipal government responsible for ensuring the safety and reliability of our community's water supply, we respectfully request that the United States Army Corps of Engineers carefully consider the potential consequences of this action on our residents and critical infrastructure.

Background

The City of Gates relies exclusively on the North Santiam River as the source for its municipal water system. Our water treatment plant employs a membrane filtration system, which provides safe, potable water to our residents and businesses. The quality and consistency of the river's water are essential to the operation of this system and, consequently, to the well-being of our community.

Concerns: Turbidity Risks and Filtration Limitations

We are particularly concerned that a deep drawdown of Detroit Reservoir will result in elevated turbidity levels in the North Santiam River. Based on operational experience and system specifications, our membrane filtration system cannot effectively filter water when turbidity exceeds 30 Nephelometric Turbidity Units (NTU). If turbidity remains above this threshold for an extended period, the filtration system will be rendered inoperable, forcing a shutdown of the water plant.

Potential Impacts: Water Supply Vulnerability

The City of Gates maintains only a three-day reserve supply of treated water. In the event of a plant shutdown due to high turbidity, we would be compelled to haul water by truck to meet the basic needs of our residents. This contingency is neither logistically feasible nor financially sustainable given our limited resources and the rural nature of our community. Prolonged disruption of our water supply

would pose a serious risk to public health and safety and would place an undue burden on both the city and its residents.

Request for Consideration and Mitigation

Considering these concerns, we respectfully urge the United States Army Corps of Engineers to carefully consider the adverse effects that a deep drawdown of Detroit Reservoir may have on the City of Gates. We request that the Corps explore mitigation measures to minimize water quality impacts or provide support and resources to help our community manage the risks associated with elevated turbidity and potential water plant shutdowns.

The City of Gates appreciates the opportunity to present our concerns and respectfully requests ongoing engagement as decisions regarding the Detroit Reservoir drawdown are made. Safeguarding our community's water supply must remain a shared priority. Should you require additional information or wish to discuss our concerns further, please contact our City Recorder Traci Archer at 503-897-2669, or email our Public Works Superintendent Greg Benthin at gbenthin.gateswtp@wbcable.net.

Thank you for your attention to this critical matter.

Sincerely,

Mayor Donald Mann
City of Gates

From:	Cam Ellis
To:	CENWP-PME-Williamette-Valley-System-EIS
Subject:	[Non-DoD Source] Detroit Deep Water Drawdown Letter
Date:	Thursday, January 8, 2026 10:03:50 AM
Attachments:	Detroit Deep Water Draw down - Cam Ellis Letter January 8 2026 Rev 1.docx

---

Please find the attached letter in reference to the proposed deep water drawdown of Detroit Lake.

Thank you,
Cam Ellis
(541) 990-6953

To the U.S. Army Corps of Engineers:

Thank you for the opportunity to comment. I also appreciate the informative meetings that have been held and the extension of the public comment period.

As a native Oregonian, I am concerned about the Deep Drawdown proposal and the potential impacts it could have on the community—specifically regarding the existing kokanee fishery, tourism, summer recreational activities, and water quality for local municipalities and communities.

I have seen firsthand the impacts the Green Peter drawdown has had on many fronts. While I understand that action was mandated by a court order, it is critical that we learn from that experience to prevent unintended consequences and mitigate impacts through scientific, data-driven analysis.

Below are my primary concerns:

1) Impacts to local fisheries

a. The kokanee population at Green Peter was devastated by the drawdown. While I understand kokanee are not a native species, they support a highly popular and productive fishery at Detroit Lake. During the spring and summer months, the lake attracts hundreds of anglers enjoying time with friends and family while teaching the next generation how to fish. This fishery not only provides recreational value but also significantly supports tourism and the local economy. A clear plan is needed to preserve this valuable kokanee fishery while balancing efforts to improve endangered salmon survival. To date, I have not heard a quantified estimate of kokanee losses resulting from a deep drawdown—only that there will be "an impact."

b. Available data appears limited or incomplete regarding salmon returns in the South Santiam River. A decision of this magnitude should not be made without additional information. As this is only the third year of drawdowns at Green Peter, there has not been sufficient time or evidence to demonstrate meaningful changes in salmon return rates.

2) Summer recreation

a. While it has been stated that a deep drawdown should not impact water levels during peak summer recreation months, I remain unconvinced. I would like to better understand how the Corps plans to manage spring water levels to prevent recreational impacts. As recently as the 2025 season, Detroit Lake did not reach the revised full pool elevation of 1,558.5 feet. Although 2025 was not classified as a dry year, lower-than-normal spring rainfall still resulted in reduced water levels. With an additional drawdown of approximately 50 feet, I am concerned there will be more years when the lake fails to reach full pool. This would further strain the local community through lost tourism, reduced lake access, and potential impacts to downstream agricultural water needs.

Additionally, I did not hear any updates regarding the revised full pool elevation of 1,558.5 feet or whether there are plans to return to the previous full pool elevation of 1,562.5 feet. Has the

impact of recent wildfires—particularly their effects on snow retention and runoff—been evaluated and accounted for in spring water retention planning?

3) Impacts to local municipalities

a. The deep-water drawdown at Green Peter significantly impacted downstream water treatment facilities, resulting in severe turbidity and degraded water quality. More data, time, and funding are necessary to allow downstream municipalities to adequately prepare for similar consequences associated with a deep-water drawdown at Detroit.

In closing, I respectfully recommend canceling or delaying the proposed deep-water drawdown until additional data is available to support a truly data-driven path forward, or until alternative, feasible solutions are developed. While the protection and recovery of endangered salmon is critically important, these decisions must be made carefully and with full consideration of their broader impacts to communities, ecosystems, and economies.

Thank you for your consideration.

Cam Ellis

2865 Foxhaven Dr SE

Salem, Oregon 97306

(541) 990-6953

From:	Steve Elzinga
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Oliver, E A (Liz) CIV (USA); Alvin M. Klausen
Subject:	[Non-DoD Source] Willamette Valley System Draft SEIS - Marion County Comments
Date:	Tuesday, January 6, 2026 1:03:26 PM
Attachments:	image002.png 2026-01-06 WVS Draft SEIS Marion County Comment on Turbidity.pdf 2025-12-16 Detroit SEIS USACE Public Comment - Marion County.pdf

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Liz and Team,

Please see the attached additional Marion County comment letter on the Willamette Valley System Draft Supplemental Environmental Impact Statement. The letter includes a request to extend the public comment period. Thank you for your review and consideration. A copy will also be sent by mail.

For your convenience, a copy of the previously submitted Marion County comment letter is also attached.

Thank you,

Steve Elzinga
County Counsel
Marion County
Office of Legal Counsel

Email: selzinga@co.marion.or.us
Phone: 503-588-5220

CONFIDENTIALITY NOTICE
This email may contain information that is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this email in error, please advise me immediately by reply email, keep the contents confidential and immediately delete the message and any attachments from your system.

County Commissioners
Colm Willis, Chair
Kevin Cameron
Danielle Bethell

Chief Administrative Officer
Jan Fritz

County Counsel
Steve Elzinga

MARION COUNTY LEGAL COUNSEL

January 6, 2026

Via Email: Willamette.EIS@usace.army.mil
Via Regular Mail:
U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946
Portland, OR 97208-2946

Re: Please extend the public comment period for the Willamette Valley System Draft SEIS

To Whom It May Concern,

On behalf of Marion County, we submit these additional comments regarding the Willamette Valley System Draft SEIS. Careful review and fidelity to federal law is important for protecting all aspects of the environment, especially water quality for Marion County residents.

Section 1205(b) of Thomas R. Carper Water Resources Development Act of 2024, required the Army Corps to complete within one year (by January 4, 2026) a "report on instances of high turbidity in a reservoir in the Willamette Valley resulting from a drawdown in the reservoir." The law includes various specific report requirements, including learning from past mistakes in the recent deep drawdowns at nearby Green Peter Lake. In violation of federal law, this report has not yet been completed. This is particularly concerning since the SEIS does not include sufficient evaluation of how turbidity from a deep drawdown at Detroit Lake will harm numerous aspects of the environment, especially by harming water quality for Marion County residents.

Under 42 U.S. Code § 4332(C), all environmental impact statements must include "a detailed statement" on "reasonably foreseeable environmental effects of the proposed agency action" among other things. Since increased turbidity has environmental impacts and Congress required a relevant turbidity report, that report will address effects that are "reasonably foreseeable," especially considering lessons from the recent deep drawdowns at nearby Green Peter Lake.

The Army Corps must complete and publish the turbidity report required by federal law and then should either (1) allow a reasonable amount of additional time for the public to review and submit comments on the SEIS based on the turbidity report or (2) revise the SEIS based on the turbidity report and then open a new public comment period based on the revised SEIS.

Regards,
Steve Elzinga
Marion County Counsel

County Commissioners
Danielle Bethell, Chair
Colm Willis
Kevin Cameron

Chief Administrative Officer
Jan Fritz

MARION COUNTY BOARD OF COMMISSIONERS

December 16, 2025

U.S. Army Corps of Engineers, Portland District
Attn: Liz Oliver, Project Manager
Willamette Valley System Draft Supplemental EIS
333 SW 1st Avenue
Portland, OR 97204

Re: Comments on the Willamette Valley System Operations and Maintenance – Draft Supplemental Environmental Impact Statement (SEIS)

Dear Ms. Oliver:

The Marion County Board of Commissioners writes to provide comments on the Draft Supplemental Environmental Impact Statement (SEIS) addressing proposed changes to the operations of the Willamette Valley System, including Detroit Dam. Marion County encompasses downstream communities that rely heavily on the North and South Santiam Rivers for drinking water, economic vitality, recreation, and overall public health. As such, we have serious concerns regarding the Preferred Alternative as it relates to Detroit Reservoir operations.

Downstream Drinking Water and Turbidity Concerns

Foremost among our concerns is the risk of increased turbidity and sediment transport to downstream drinking water systems that rely on the Santiam River system as their primary source of potable water. Communities including Salem, Stayton, Turner, Jefferson, and multiple rural water districts collectively serve more than 200,000 Oregonians using water drawn directly from the Santiam Rivers. These systems are not designed to withstand prolonged or repeated high-sediment events without substantial cost, operational disruption, or risk to public health.

The SEIS characterizes anticipated turbidity impacts as "moderate," yet recent experience in the Willamette Basin calls that conclusion into question. The Green Peter and Foster Reservoir drawdown experiment, conducted for similar fish passage objectives, resulted in extreme turbidity levels downstream and tens of millions of dollars in documented damage to municipal drinking water infrastructure. Critically, the SEIS does not adequately incorporate this real-world data into its analysis, nor does it demonstrate how conditions at Detroit would materially differ in a way that meaningfully reduces risk.

Without clear, quantitative sediment modeling, turbidity projections, treatment-threshold analysis, and contingency planning, the SEIS does not provide sufficient assurance that downstream drinking water systems can operate reliably under the proposed drawdown regime. The Board is particularly concerned that proceeding without these analyses places local governments and ratepayers at risk of bearing the financial and public health consequences of a federal operational decision.

Scientific Uncertainty and Effectiveness of the Proposed Action

The Board is also concerned that the SEIS does not demonstrate, with site-specific scientific evidence, that the proposed deep drawdown at Detroit Dam will achieve its intended biological outcomes. While improving passage for ESA-listed salmonids is an important goal, the SEIS relies heavily on assumptions rather than empirical results. Notably, the Green Peter/Foster drawdown experiment has not yet demonstrated measurable improvements in salmon returns, and adult fish response will not be known for several years.

Given this uncertainty, it is premature to expand or replicate a drawdown strategy that has already produced severe and documented downstream impacts elsewhere in the basin. The SEIS does not answer the fundamental question facing affected communities: does this approach actually work, and does the anticipated benefits outweigh the demonstrated risks? Absent clear evidence of effectiveness, Marion County believes it is inappropriate to impose further risk on downstream water users and communities.

Cumulative Impacts of Federal Actions

Communities in the North Santiam Canyon and downstream Marion County have repeatedly absorbed the impacts of federal decisions related to land management, forest policy, dam operations, and emergency response. These cumulative impacts matter. Local governments and residents have consistently been asked to adapt to operational changes over which they have little control, while shouldering long-term economic and infrastructure consequences.

This proposed operational change must be evaluated within that broader context. The SEIS, as drafted, does not sufficiently account for the cumulative burden placed on these communities by successive federal actions, particularly when risks are localized while benefits remain uncertain or long-term.

Ongoing Recovery from the 2020 Wildfires

Finally, the Board emphasizes that communities in and around the Santiam Canyon are still actively recovering from the devastating 2020 Labor Day wildfires, which caused catastrophic loss of homes, businesses, infrastructure, and community stability in Detroit, Idanha, Gates, Lyons, and surrounding areas. Recovery has been slow and uneven, and recreation-based economic activity tied to Detroit Lake and the Santiam River system remains a critical pillar of that recovery. Actions that further disrupt reservoir levels, water quality, or recreation access risk undermining this fragile progress, yet the SEIS does not sufficiently analyze or acknowledge how the proposed drawdown could compound ongoing wildfire-related economic and social impacts.

Marion County's Request

The Marion County Board of Commissioners remains committed to protecting Oregon's natural resources and ensuring the long-term health and resilience of our environment. However, we cannot support proceeding with a deep drawdown at Detroit Dam without clearer scientific justification, comprehensive incorporation of lessons learned from the Green Peter/Foster experiment, and robust analysis of downstream drinking water risks and community impacts.

We respectfully request that the U.S. Army Corps of Engineers pause further implementation of this proposed operational change until:

- The results of prior drawdown experiments are fully evaluated and publicly documented;
- Site-specific sediment and turbidity modeling is completed for Detroit Reservoir;
- Downstream drinking water providers are fully engaged and protected; and
- The cumulative and post-wildfire impacts to Santiam Canyon communities are meaningfully addressed.

Marion County stands ready to work collaboratively with the Corps to identify solutions that balance fish recovery goals with public health, water reliability, and community resilience.

Thank you for your consideration of our comments.

Sincerely,

Danielle Bethell
Chair

Colm Willis
Commissioner

Kevin Cameron
Commissioner

From: Dave White
To: Dave White
Subject: [Non-DoD Source] intent to sue
Date: Sunday, January 4, 2026 7:59:47 PM
Attachments: image001.png
image002.png
image003.png
Green Peter and other dams Lawsuit.pdf
Importance: High

$450 million

Case 18-cv-00437-HZ ruling was based on incomplete science and Plaintiffs using Federal Department of Justice Attorneys to sue the government. This is 18 USC 11 conflict of interest. Specifically Section 203 87-849 Conflict of Interest Provisions of Public Law.
Furthermore, the ruling said to drain the dam to release the massive silt behind it (The silt "ramp" is around 775 feet tall according to an Operator of the dam). The result was dark, colored water running from Linn County faucets. The clean water act specifically prevents creating this condition: the provisions of the Federal Water Pollution Control Act, specifically 33 U.S.C. 1251 a. 1-7. This is also 42 USC CHAPTER 6A, SUBCHAPTER XII: SAFETY OF PUBLIC WATER SYSTEMS.
The previous case ruling is a violation of Oregon law ORS 496.705, resulting in damage suits for negligent, but unlawful killing of wildlife. The uninformed action on Green Peter Dam killed thousands of fish. This is a violation of the Endangered Species Act, specifically Section 11. Penalties and Enforcement 1 a.
Additionally, there was no Section 404 permit for the drawdown because it was court-ordered. This is a violation of the Clean Water Act as: 33 CFR Parts 320-332) authorizes only the Corps to issue permits for the discharge of dredged or fill material into navigable waters. Jurisdictional waters were later expanded to include "waters of the United States" for Section 404 purposes.
There is no legal or scientific reason to remove any dam. Fish ladders

work if properly maintained. If a fish ladder on a dam doesn't work check with the operators of the dam to find out, why. The injunction is to

vacate the erroneous ruling in 18-cv-00437-HZ, because nobody but Plaintiff had the common sense to check with the operator of the dam.

https://www.northwestobserver.com/index.php?ArticleId=3356

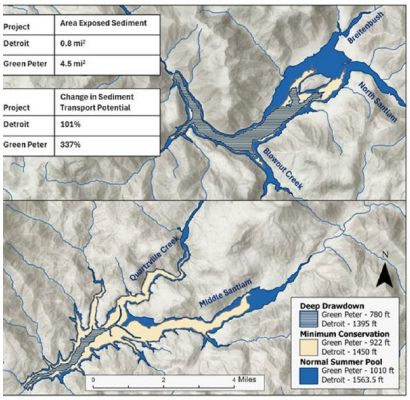
Ron Edwards will testify as an expert witness. Ron was an Operator for Green Peter and Foster Reservoir. This is his exhibits
https://1drv.ms/b/c/d172f747c79ee46a/Eear1THKqfIlpQdFm1fKqCcBpT4aRf1edoueL9hHxr_3Zw?e=pv65n4

Predatory Journals are a Fabrication.
The American Meteorological Society (AMS), Plus One Journal and the Nature Climate Change (NCC) Journals started the predatory journals list website to distract from what the AMS and Plus One and the NCC are doing. These AMS, Plusone and NCC journals charge thousands of dollars to publish manuscripts based on jaundiced science, and then perform prejudiced peer reviews. Their chief editors operate on a "belief" system based on political narratives and not the climate science issues.
For example, if a manuscript doesn't match their belief system, then it won't go to peer review. These journals also have a very high publishing rate. They almost always publish everything the chief editor allows to be peer reviewed. Also, their impact factors (the benchmark for journal effectiveness) are typically lower than the so-called predatory journals.
Predictably, the predatory journals list maligns many good journals, like the respected International Journal of Chemical Engineering. These journals generally charge lower rates in the range of $300 to $500 to publish a manuscript. Furthermore, they usually have higher impact factor scores than the AMS, Plus One or NCC journals. The Predatory Journals chief editors, like myself, function with an open-minded, scientific review system. That's what actual scientists do and teach their students to do as well.

2024 illegal deep drawdown violates The clean water act specifically prevents this: the provisions of the

Federal Water Pollution Control Act, specifically 33 U.S.C. 1251 a. 1-7.

Potential Deep Drawdown Impacts

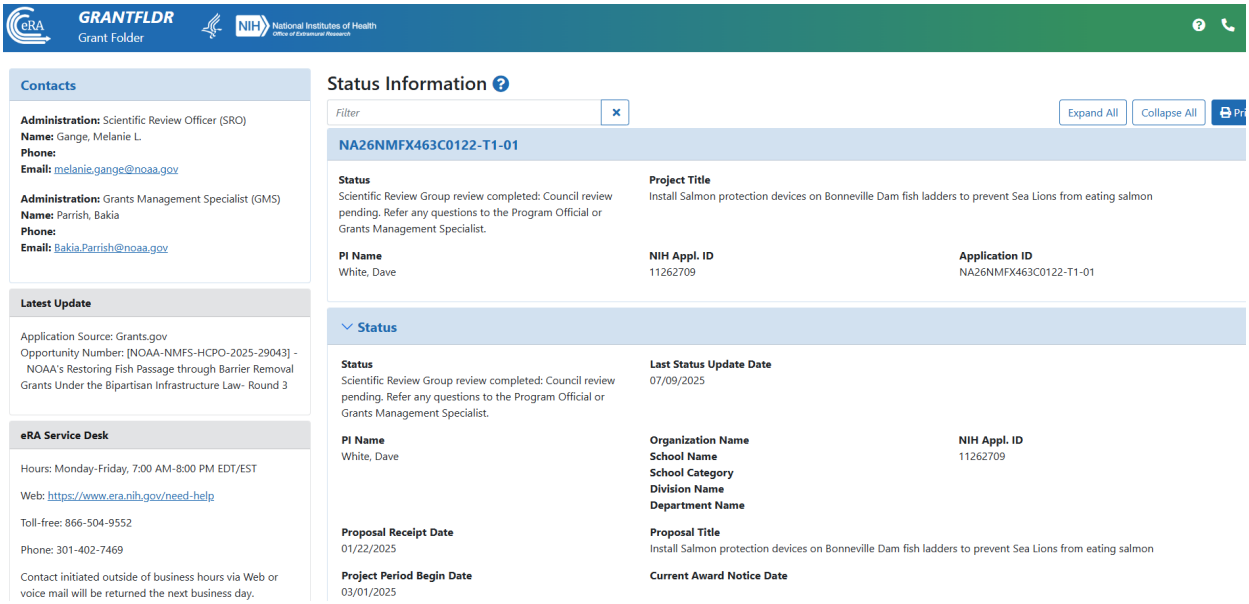


Green Peter and Detroit Drawdown Areas

Source: US Army Corps of Engineers

Santiam River Confluence during the 2023 deep drawdown of Green Peter Dam.

On another note our device to fix the salmon issue on the Columbia river has finish scientific peer review at NOAA fisheries.



We can help with lawsuits and injunctions. No legal or scientific reason to remove any dam. Fish ladders work. The sea lions are the almost 1:1 ratio to the decline of the salmon in the Columbia river. Our salmon protection device attached to the downstream fish ladders will fix declining salmon runs within seven years, 503-608-7611

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

	Case
David White P1	$450 Million COMPLAINT FOR
18965 NW Illahe St	DECLARATORY JUDGEMENT,
Portland, Or 97229	INJUNCTIVE RELIEF, AND DAMAGES.
	JURY TRIAL REQUESTED

Dave@salmonprotectiondevice.com

v.

Amy van Saun, as President D1 et al
NORTHWEST ENVIRONMENTAL
DEFENSE CENTER,
newa@northwestenvironmentaladvocates.org
P.O. Box 12187
Portland, OR 97212-0187
503/295-0490

Betsy Gaines Quammen D2 as
president of WILDEARTH GUARDIANS
info@wildearthguardians.org
301 N. Guadalupe St., Ste. 201
Santa Fe, NM 87501
Ph. 505.988.9126,

Native Fish Society D3
Mark Sherwood as Executive Director
NATIVE FISH SOCIETY
PO Box 1536, Oregon City, OR 97045
Office: 503.344.4218
Army Corp of Engineers D4
NATIONAL MARINE FISHERIES SERVICE D5

Defendants

Attorneys for Defendants D1-D3

Kaitlyn Poirier
United States Department of Justice
Environment & Natural Resources Division
Ben Franklin Station
P.O. Box 7611
Washington, DC 20044
Michael R. Eitel
United States Department of Justice
Environment & Natural Resources Division
Ben Franklin Station
999 18th Street, South Terrace, Suite 302
Denver, CO 80202

Class action Members:

INTRODUCTION

Cause of action

1 Case 18-cv-00437-HZ ruling was based on incomplete science and Plaintiffs using Federal Department of Justice Attorneys to sue the government. This is 18 USC 11 conflict of interest. Specifically Section 203 87-849 Conflict of Interest Provisions of Public Law.

2 Furthermore, the ruling said to drain the dam to release the massive silt behind it (The silt is around 775 feet tall according to an Operator of the dam). The result was dark colored water running from Linn County their faucets. The clean water act specifically prevents this: the provisions of the Federal Water Pollution Control Act, specifically 33 U.S.C. 1251 a. 1-7. This is also 42 USC CHAPTER 6A, SUBCHAPTER XII: SAFETY OF PUBLIC WATER SYSTEMS.

The previous case ruling is a violation of Oregon law ORS 496.705, resulting in damage suits for negligent, but unlawful killing of wildlife. The uninformed action on

Green Peter Dam caused thousands of fish to die. This is Endangered Species Act, specifically Section 11. Penalties and Enforcement 1 a.

Defendants solution for Salmon in the Willamette Valley Oregon is junk science at best. Defendants killed more COHO Salmon than they saved. This is a violation of) 18 U.S. Code § 41 - Hunting, fishing, trapping;

disturbance or injury on wildlife refuges. Specially section 676. Hunting, trapping, killing, or capturing game on Norbeck Wildlife Preserve unlawful. Plaintiffs request the court to consider the Oregon Coast is a wildlife preserve as it is. https://www.fws.gov/refuge/oregon-islands

Additionally, now section 404 permit for the drawdown because it was court ordered. This is a violation of Clean water act as: 33 CFR Parts 320-332) authorizes the Corps to issue permits for the discharge of dredged or fill material into navigable waters. Jurisdictional waters were later expanded to include “waters of the United States” for section 404 purposes.

There is no legal or scientific reason to remove any dam. Fish ladders

work if properly maintained. If a fish ladder on a dam doesn’t work

check with the operators of the dam to find out, why. The injunction is to

vacate the erroneous ruling in 18-cv-00437-HZ, because nobody but

Plaintiff had the common sense to check with the operator of the dam.

State a claim

1. Class Action members and Plaintiffs are harmed (directly affected) by the proposed loss of hydroelectric, clean energy, projected for the next decade.

2. Class Action members and Plaintiffs are harmed (directly affected), by the proposed drawdowns because of resulting, silt-laden, dark colored water running from their faucets.

3. Class Action members and Plaintiffs are harmed (directly affected) by the local municipal city and county water systems using up all available water filters in a few days following the most recent Green Peter drawdown.

Plaintiff visited Green Peter dam with his sister and talked to one of the operators of the dam. Plaintiff was told that the silt has built up to 775 feet above the stream bed on the upstream side, and the fish ladder at 525 feet has been plugged with silt since 1989. This has produced direct harm to Plaintiff and Class Action members.

4. On the way home Plaintiff called the Oregon State University Professor who published the incomplete science report in a predatory journal. In twenty minutes, Plaintiff convinced him that their proposed draw-down solution was much worse than the problem because it suffocated the fish. He agreed to the dredge proposal.

5. Plaintiff's sister will testify to this conversation.

6. Defendants failed to consult with the true local stake holders living close to the affected dams to discover the correct solution. They seem to lack good investigative skills required by the scientific method, choosing rather to rely on purveyors of incomplete science to support a favored, preconceived hypothesis.

7. There is no legal or scientific reason to remove any dam. Fish ladders work if properly maintained. If a fish ladder on a dam doesn't work check with the operators of the dam to find out, why.

Therefore, the Statement of Claim requirement in this case has been satisfied.

https://www.northwestobserver.com/index.php?ArticleId=3356

42 USC CHAPTER 6A, SUBCHAPTER XII: SAFETY OF PUBLIC WATER SYSTEMS the provisions of the Federal Water Pollution Control Act

[33 U.S.C. 1251 a, 1-7 (1)it is the national goal that the discharge of pollutants into the navigable waters be eliminated by 1985;

8. There is no reason to do the Detroit lake drawdown. The issue they have is the fingerlings heading back to the ocean can't find the fish ladder because it's at the wrong height. I told the Corp in a meeting in sweet home about the need to put a stainless steel fence on the upstream side of the dam to prevent the fingerlings from going through the dam. Then the leaders of the schools of fish will find the fish ladder and go down it.

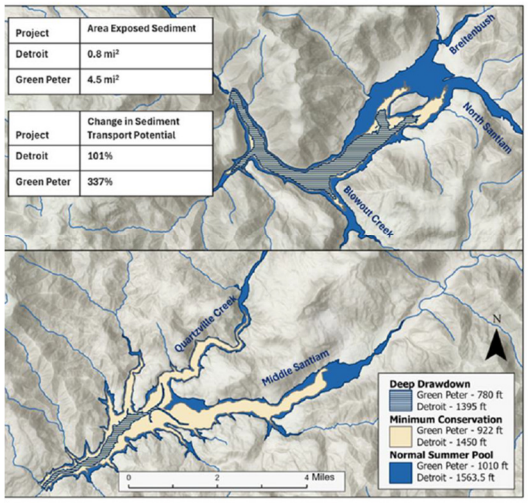
9. The BiOP is based on junk science. This is fish biologists on the East coast of the USA telling the Northwest what to do for dams with almost no input from the west coast. An Injunction to stop it will be filed. Following this scientific nonsense has killed endangered species of salmon and violates the clean water act.
https://www.nwp.usace.army.mil/Missions/Environmental-Stewardship/Fish/WVP-BiOP/

This is a violation of 33 U.S.C Chapter 26.

10. The Northwest Grid is crashing. Plaintiff went to a Cascade policy institute where Grid Expert John A. Charles, Junior on October 18th 2023 showed the Northwest Electric Grid is 2.2 Gigawatts short. Now with the Klamath River Dams gone the grid is negative 2.375 gigawatts. The seven dams in question are almost one gigawatt of clean renewable power.

11. Defendants solution for Salmon in the Willamette Valley Oregon is junk science at best. Defendants killed more COHO Salmon than they saved. This is a violation of 18 U.S. Code § 41 - Hunting, fishing, trapping; disturbance or injury on wildlife refuges. Specially section 676. Hunting, trapping, killing, or capturing game on Norbeck Wildlife Preserve unlawful. Plaintiffs request the court to consider the Oregon Coast is a wildlife preserve as it is. https://www.fws.gov/refuge/oregon-islands

Potential Deep Drawdown Impacts



Green Peter and Detroit Drawdown Areas

Source: US Army Corps of Engineers

Santiam River Confluence during the 2023 deep drawdown of Green Peter Dam

This image shows clearly violation of clean water act from the green peter dam drawdown. The north Santiam river will look the same if Detroit Dam has a drawdown.

JURISDICTION

Federal court in Oregon has jurisdiction because the Clean Water act is a

federal act. Defendants violated the clean water act.

Venue

The U.S. Army Corps of Engineers (USACE), (Corps) is studying eight

dams to remove hydropower capabilities based on a fake East Coast

biological opinion.

Why are people from Oregon listening to some East Coast woke

bureaucrat who doesn't know what they are talking about.

Salmonprotectiondevice.com has garnered much **r**espect in

the Ninth Circuit Court of Appeals and in the U.S. Supreme Court for

exposing this kind of fake science.

LEGAL STANDING

Plaintiff and Class Action members have personal legal standing.

Plaintiff's legal standing is based on the federal laws broken by defendants

and overwhelming support by local stakeholders (Class Action members).

Plaintiff also is a long time Oregonian who grew up in Western Oregon.

Plaintiff's family hunted, camped, and fished around the areas affected by this Complaint and the Klamath area. Plaintiff is extremely distraught to see the destruction of an area he and his family loved as a child and still treasures.

Conclusion

To improve all salmon and other fish runs, the fish ladders need to be improved and the sediment build-up behind the dams (from almost 100 years) needs to be dredged up and removed. Salmonprotectiondevice.com has the NOAA Fisheries approved fish ladder design criteria. Around $30 million is the cost to dredge behind each dam.

A Section 408 and Joint Permit Application are underway. Plaintiff's brief clearly shows the violation of the FRCP 404, (Clean water act) which resulted in the death of numerous endangered species.

Many valid reasons have been given as to why the Preliminary Injunction in must be granted by the Court.

Relief Sought

1. Vacate the erroneous ruling in 18-cv-00437-HZ which was based on incomplete and misguided scientific analysis.

2. Pay dredging costs behind Green Peter and the other dams affected by 18-cv-00437-HZ This cost is estimated to be around $30 million per dam.

3. Remove DOJ attorneys from defendant's **Counsel**. That is 18 USC 11 Conflict of interest. Complaint filed with the DOJ about this.

FIRST CLAIM FOR RELIEF

Defendants must pay the dredging costs for all the dams affected by the order.

SECOND CLAIM FOR RELIEF

Vacate the ruling in 18-cv-00437-HZ Which is based on incomplete science published in a predatory journal.

Respectfully Dated: 08/17/2025
David White
Salmon Protection Device

CERTIFICATE OF SERVICE

I hereby certify that on August 23rd, 2025, a true and correct copy of the above document was electronically filed with the Clerk of the Court using CM/ECF. A copy of the document will be served upon interested parties via the Notices of Electronic Filing that are generated by CM/ECF. Additionally, a courtesy copy is being provided as follows:

Attorneys for Defendants D1-D3
Kaitlyn Poirier
United States Department of Justice
Environment & Natural Resources Division
Ben Franklin Station
P.O. Box 7611
Washington, DC 20044
Michael R. Eitel
United States Department of Justice
Environment & Natural Resources Division
Ben Franklin Station
999 18th Street, South Terrace, Suite 302
Denver, CO 80202

___ Via hand delivery
___ Via U.S. Mail, 1st Class,
Postage Prepaid
___ Via Overnight Delivery
___ Via Facsimile
XX Via Email
XX Via CM/ECF notification
to the extent registered DATED: August 22nd, 2025.
By: David White

David C. White Pro Se. August 23rd, 2025

From:	Dave White
To:	CENWP-PME-Williamette-Valley-System-EIS
Subject:	[Non-DoD Source] WVS EIS Public Comments
Date:	Thursday, January 1, 2026 1:35:35 PM
Attachments:	willammette valley dams.pdf Green_Peter_and_other_dams_Lawsuit.pdf 25-5808_REHEARING_BY_RULE_44.pdf
Importance:	High

The document attached about the dams was signed by William C. Hannan, Jr. Brigadier General, U.S. Army Commanding.
The Judges decision was based on junk science published in a predatory journal. The 2008 and 2024 fake Biological Opinions are cherry picked junk science, That is illegal the Chevron doctrine is null and void since 2005. The fact is we need the power and the fish. The fish ladder at Green Peter has been full of silt since 1989. The Corp has wasted $1.1 million per year for over 36 years. Close to $40 million in waste. Because you still want to do what is illegal I am filing a whistle blower complaint against the CORP today.
https://thelawisyourattorney.com/loper-bright-enterprises/

All courts must be article III of the US Constitution.
Chevron doctrine is illegal Agencies like FERC and EPA cant cherry pick data for their false agenda.
Stare decisis must be vertical to the Constitution, not horizontal. This is because any other case can't be guaranteed to have enough similarities to warrant use unless the Judge and counsel on both sides have read case transcripts, exhibits and final ruling.

No legal or scientific reason to remove any dam. Fish ladders work. The sea lions are the almost 1:1 ratio to the decline of the salmon in the Columbia river. Our salmon protection device attached to the down stream fish ladders will fix declining salmon runs within seven years, salmonprotectiondevice.com 503-608-7611 x602
Reality is that which when taken away still exists.

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, NORTHWESTERN DIVISION
PO BOX 2870
PORTLAND OR 97208-2870

RECORD OF DECISION

WILLAMETTE VALLEY SYSTEM OPERATIONS AND MAINTENANCE FINAL ENVIRONMENTAL IMPACT STATEMENT

WILLAMETTE VALLEY, OREGON

Section 1. Introduction

The U.S. Army Corps of Engineers (Corps), Portland District prepared this programmatic Environmental Impact Statement (EIS) in compliance with the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321, and Corps NEPA Implementing Regulations, 33 C.F.R. Part 230. The EIS focused on the continued operation and maintenance of the Willamette Valley System (WVS) for its Congressionally authorized purposes and to comply with the Endangered Species Act (ESA). Twelve Cooperating Agencies and other interested Tribes provided information and review throughout the EIS process. The Corps and cooperators' expertise, developed over decades of experience operating the projects, allowed for careful, comprehensive consideration of current, high quality technical and scientific information, as well as expert analysis for thorough evaluation of the actions.

During completion of the Final EIS, Congress passed the Water Resources Development Act (WRDA) of 2024. Section 1326 of the Act directed the Corps to include additional analysis of a no hydropower alternative before completing review of operation and maintenance of the system. (Pub. L. No. 118-272). However, for the Corps to operate the system in the interim in compliance with its authorizing legislation and other federal requirements (e.g., the ESA, NEPA, and its Tribal trust responsibilities), the Corps is executing this Record of Decision (ROD) on a narrow subset of interim actions it will take for ESA listed species while a supplemental EIS is prepared as required by WRDA 2024. These interim actions model the injunction operations in *Northwest Environmental Defense Center, et al. v. United States Army Corps of Engineers, et al., No. 3:18-cv-00437-HZ, (D. Or. September 2021), (NEDC v. USACE)* and other actions in the National Marine Fisheries Services' (NMFS) 2024 Biological Opinion, issued on December 26, 2024.

Section 2. Background and Statutory Framework

The Corps operates the WVS in accordance with the project's authorizing documents and prepared this EIS in compliance with the NEPA, ESA, National Historic Preservation Act (NHPA), and all other applicable laws and Treaties. The need for the EIS is to review and update the management of the WVS in the context of new information and changed conditions in the Willamette River Basin after the 1980 EIS *Operations and*

Maintenance of the Willamette Reservoir System and ROD, and bring the system into compliance with the ESA.

To address these needs the EIS took a hard look at operational and structural measures to improve upstream and downstream fish passage for ESA listed species while continuing to operate and maintain its projects for authorized purposes. In total, eight alternatives were evaluated in detail in the Final EIS, including the No Action Alternative. The action alternatives were formulated to improve fish passage and water quality for ESA listed species. However, Section 1326 of WRDA 2024 passed shortly after NMFS completed its Biological Opinion for the WVS, limiting the actions the Corps could select in this ROD until it can formally analyze an additional alternative that ceases hydropower operations at its eight hydropower facilities in the WVS.

2.1 Litigation History

In 2008, the Corps received a Biological Opinion from the NMFS on its operation and maintenance of the WVS concluding the operation and maintenance of the WVS would jeopardize the continued existence of certain listed species. Therefore, the Biological Opinion included over 90 measures to implement as part of a Reasonable and Prudent Alternative (RPA) to avoid jeopardy. The Corps implemented many of the requirements in the 2008 NMFS Biological Opinion. However, due to the necessary modifications to the dams to accommodate construction of large-scale juvenile fish passage and temperature control structures, and projected high costs, it was unable to implement several of the key measures. In 2020, the U.S. District Court for the District of Oregon ruled in *NEDC v. USACE* the Corps failed to complete implementation of the 2008 Biological Opinion's RPA and was in violation of Section 7 and 9 of the ESA.

On September 1, 2021, the Court issued an injunctive order requiring the Corps to implement interim actions intended to improve conditions for fish passage and water quality in the WVS to avoid irreparable harm to ESA listed salmonids while NMFS developed a new Biological Opinion. These actions included operational changes and three structural modifications to existing dams and reservoirs. The Corps is reviewing the direct and indirect effects of these construction actions under separate site specific NEPA compliance processes; therefore, they are not assessed in this EIS or included in this ROD (Table 1). The NMFS Biological Opinion was issued in late December 2024, but the case is ongoing.

Table 1: Ongoing design and construction efforts for injunction structural improvements.

Location	Court-ordered Structural Improvements	Status
Dexter Fish Facility	Upgrade the Dexter adult fish facility to improve survival and upstream passage.	Construction is ongoing and is scheduled to be complete in 2026.
Big Cliff Dam	Determine whether operational measures are sufficient to maintain acceptable total dissolved gas levels below Big Cliff Dam and, if not, design and construct a structural solution for mitigating excess total dissolved gas levels during spill operations.	The Corps determined operational fixes are not sufficient and developed a schedule for design and construction of rock weirs to further reduce total dissolved gas. Design work is ongoing.
Cougar Dam	Determine whether structural improvements/modifications to regulating outlets need to be made to ensure safer fish passage and to reduce total dissolved gas levels. If so determined, design and construct a structural solution.	The Court established Expert Panel recommended resurfacing the regulating outlet chute which was completed in 2023. Design work for additional modification to the regulating outlets (ROs) are ongoing.

2.2 Statutory Background and Environmental Compliance

The Corps must comply with all applicable laws and Treaties such as the NEPA, ESA, NHPA, various WRDAs, Administrative Procedures Act, and the projects' authorizing legislation, in addition to non-statutory legal requirements under its Tribal Trust responsibilities. A more detailed description of compliance with the WVS authorizing legislation, applicable WRDA provisions, NEPA, ESA, and NHPA are provided in subsections 2.2.1-2.2.5 of this ROD and Chapter 7 of the Final EIS. Development of the EIS was accompanied by the development of a robust Adaptive Management Plan that lays out a framework for research, monitoring, and evaluation of actions so the Corps may continue to work with NMFS and the U.S. Fish and Wildlife Service (USFWS) to better understand its actions and how best to meet ESA species needs.

The Corps NEPA implementing regulations require NEPA documents to include a summary of reviews and consultation requirements, analyses, and status of coordination associated with applicable laws, executive orders, and memoranda (33 C.F.R. Part 230.25(a)).

2.2.1 Flood Control Acts

Congress authorized the Corps to construct, operate, and maintain the initial reservoirs in the WVS for flood control and navigation purposes beginning in 1938. Subsequently, the Corps constructed 13 dams and extensive bank protection revetments along the Willamette River and its tributaries, creating the WVS by the 1970s. Congress authorized the various purposes of the WVS in the Flood Control Acts (FCA) between 1938 and 1962, the Water Supply Act of 1958, and the Water Resources Development Act of 1986.

Congress also delegated responsibility for certain aspects of the WVS to two other Federal Agencies, Bonneville Power Administration, which markets and transmits the electrical power generated by the eight hydropower producing dams, and the U.S. Bureau of Reclamation, which markets water for irrigation purposes to users within the Willamette River Basin.

2.2.2 Water Resources Development Act of 2024

On January 4, 2025, the 2024 Water Resources Development Act was signed into law (Pub. L. No. 118-272). Section 1326 of the Act included language directing the Secretary of the Army to not "complete review of, and consultation with other Federal agencies on, the operation and maintenance of the projects for flood control, navigation, and other purposes, Willamette River Basin, Oregon […], until the Secretary prepares and formally analyses an alternative which ceases hydropower operation at the projects, notwithstanding hydropower being an authorized purpose of such projects." The Corps is proposing to comply with this directive in a supplement to this EIS, where a no hydropower alternative would be analyzed before a final decision on long term actions is made. Section 1326 limits the Corps discretion to make decisions on long term actions in this ROD, narrowing the focus of this ROD to the interim, near-term actions the Corps will implement while the supplement is completed.

2.2.3 National Environmental Policy Act

The information presented in this ROD summarizes the agency's compliance with the NEPA including the development of the purpose and need statement, alternatives, and the public review processes required by 33 C.F.R. Part 230 and 42 U.S.C. §§ 4321. The WVS EIS provided information that allowed the Corps, cooperating agencies, and stakeholders to evaluate the costs, benefits, and tradeoffs of various actions. The public then provided critical input for the decision maker on the Draft EIS, prior to the ROD.

2.2.3.1 Purpose and Need

The purpose and need for the continued operations and maintenance of the WVS is to operate the system in accordance with the eight Congressionally authorized purposes and in compliance with the ESA and all other applicable Treaties, laws, and regulations. The Corps must operate and maintain the WVS for specific purposes but cannot jeopardize the continued existence of a species listed as threatened or endangered or

take action which will result in the destruction or adverse modification of designated critical habitat under the ESA.

2.2.3.2 Alternatives

Using public comments, internal cross disciplinary working groups, and input from cooperating agencies, the Corps EIS team and cooperators identified and compiled a list of operational and structural measures, or actions, which meet seven objectives the Corps developed for the Proposed Action. These objectives are defined in Section 2.6 of the Final EIS. A measure is the action an agency would take to achieve a given objective. It describes either a physical (structural) change requiring construction or an operational change, usually in a precise location, which meets an objective, in whole or in part.

The team screened out potential measures based on criteria for meeting purpose and need for the project, achieving stated objectives, and technical considerations. The team then fashioned alternatives using combinations of the remaining measures around unifying themes or strategies. An alternative is a combination of one or more measures which together, would address one or more of the objectives. Building alternatives was an iterative process that increased the level of detail at each step to inform decisions concerning which alternatives to carry forward for analysis and consideration.

Following initial modeling and evaluation of preliminary alternatives, new refined alternatives were developed to assess modified combinations of measures, and to distinguish the tradeoffs associated with key measures. Each alternative has a strategy which emphasizes project objectives differently. Table 2 lists the alternative and associated objective. After screening, the measures which had the best outcomes for project objectives were compiled into Alternative 5 that represents a hybrid of the other six alternatives.

Table 2: Alternative Plans that were evaluated in detail in the Final EIS.

Alternative	Strategy
No Action	O&M practices as of the Notice of Intent to prepare the EIS in 2019
Alternative 1	Improve Fish Passage Through Storage-Focused Measures- Increase the probability of refilling WVS reservoirs and supplemental water delivery for authorized purposes.
Alternative 2A & 2B	Integrated Water Management Flexibility and ESA Listed Fish Alternative
Alternative 3A & 3B	Operations Focused: Improve passage of ESA listed fish through existing structures by modifying water control operations
Alternative 4	Structures Focused: Improve passage of ESA listed fish by constructing new fish passage and temperature control structures
Alternative 5	Refined Integrated Water Management Flexibility and ESA Listed Fish Alternative - Preferred Alternative

A detailed descriptions of the alternatives and the alternative development process can be found in Chapter 2 and Appendix A of the Final EIS.

2.2.3.2.1 No Action Alternative

The No Action Alternative (NAA) is consistent with 2019 operations and maintenance during the 30-year implementation timeframe. Modeling for the EIS analyses began in April 2019, which is the date establishing benchmark operations for alternative analyses comparisons. This benchmark was necessary given the length of time needed to complete the EIS and several temporary operational changes which were shifting throughout EIS development due to temporary dam safety operations and ongoing litigation. Therefore, the NAA does not include operations implemented as a result of the ongoing litigation and August 2021 court ordered injunction because those operations were not in place as of April 2019. No large-scale construction is contemplated under the NAA.

This alternative would not meet the purpose of and need for the Proposed Action because the current operating conditions of the WVS do not adequately protect ESA listed fish species, specifically UWR Spring Chinook salmon and UWR Winter Steelhead or designated critical habitat for these species.

2.2.3.2.2 Alternative 1. Improve Fish Passage Through Storage-Focused Measures

Alternative 1, also referred to as the Storage Alternative, maximizes the refill volumes of conservation pools by using a greater portion of the conservation pool and the inactive and power pools at WVS reservoirs to meet authorized purposes which depend on full reservoirs, including municipal and industrial and irrigation water supply, recreation, and

water quality, as well as to improve fish passage through the WVS dams to increase the survival of ESA listed fish species.

The main operational features of Alternative 1 are to reduce minimum flows to the Congressionally authorized minimum flow requirements as well as to augment instream flows by using the power and inactive pools. Alternative 1 proposes only structural measures for downstream fish passage and water quality, such as the Floating Screen Structure (FSS).

2.2.3.2.3 Alternative 2A. Integrated Water Management Flexibility and ESA-Listed Fish Alternative (Includes Structural Downstream Passage at Cougar Dam)

Alternative 2A, also referred to as the Hybrid Alternative with Cougar FSS, was developed after initial modeling of the other action alternatives. It focuses on improvements for fish passage using a combination of modified operations and structural improvements and measures which balance water management flexibility to meet ESA listed fish obligations. In Alternative 2A, the "Integrated Temperature and Habitat Flow Regime" operation replaces the 2008 Biological Opinion flows in the NAA. This would shift the release of stored water from the Spring to the Summer and Fall, most prominently in dry years. Alternatives 2B, 3A, 3B, and 4 also include this flow measure.

The other main operational feature of Alternative 2A is the augmentation of instream flows by using water reserved for the power and inactive pools. Alternative 2A does not include the structural improvements for total dissolved gas (TDG) abatement found in Alternatives 1 and 4 or the fish passage and temperature structures at Hills Creek Dam found in Alternative 4. Like all alternatives except Alternative 1, Alternative 2A proposes operational measures using the spillway and regulating outlets (ROs) for temperature management at Green Peter. Alternative 2A also includes a deep fall drawdown and spring spillway operations for fish passage at Green Peter, like Alternatives 2B, 3A, 3B, and 5. The only difference between Alternative 2A and 2B is in the downstream passage measure at Cougar Dam. Alternative 2A proposes structural downstream fish passage at Cougar Dam whereas Alternative 2B proposes operational fish passage at Cougar Dam via the diversion tunnel.

2.2.3.2.4 Alternative 2B. Integrated Water Management Flexibility and ESA-Listed Fish Alternative (Includes Operational Downstream Passage at Cougar – Drawdown to Diversion Tunnel)

Alternative 2B, also referred to as the Hybrid Alternative with Cougar Diversion Tunnel Modification, improves fish passage through the WVS dams using a combination of modified operations and structural improvements, along with other measures to balance water management flexibility and to meet ESA listed fish obligations. Alternative 2B is like Alternative 5 except for the flow measure.

2.2.3.2.5 Alternative 3A. Improve Fish Passage Through Operations-Focused Measures (Includes Operational Downstream Passage at Cougar – Drawdown to Regulating Outlet)

Alternative 3A, also referred to as the Operations Focused Fish Passage Alternative, would use WVS dam operations for water quality and fish passage. Alternative 3A does not include structural measures for temperature control, TDG abatement, or downstream fish passage like Alternatives 1, 2A, 2B, 4 and 5. Like Alternatives 2A, 2B, 3B, and 4, the "Integrated Temperature and Habitat Flow Regime" operation replaces the 2008 Biological Opinion flows in the NAA under Alternative 3A.

Alternative 3A would implement spring and fall drawdowns at some WVS reservoirs for volitional downstream fish passage. Additionally, Alternative 3A proposes new adult fish facilities at Hills Creek and Blue River. Under Alternative 3A, the Spring and Fall drawdowns would target the Cougar RO, whereas the Alternative 3B drawdowns would target the much lower diversion tunnel (like Alternatives 2B and 5). By distinguishing between Alternatives 3A and 3B cooperators could compare the impacts and tradeoffs associated with each operation for downstream passage at Cougar.

2.2.3.2.6 Alternative 3B. Improve Fish Passage Through Operations-Focused Measures (Includes Operational Downstream Passage at Cougar – Drawdown to Diversion Tunnel)

Alternatives 3B, also referred to as the Operations Focused Fish Passage Alternative, would use WVS dam operations for water quality and fish passage. Alternative 3B is like Alternative 3A but differs on downstream fish passage operations in the Spring and drawdowns for fish passage operations at Cougar Dam. Under Alternative 3B, the Spring and Fall drawdowns at Cougar Dam would target the diversion tunnel resulting in a much lower drawdown.

2.2.3.2.7 Alternative 4. Improve Fish Passage with Structures-Based Approach.

Alternative 4 uses structures to improve fish passage to increase the survival of ESA listed fish. Like Alternative 1, Alternative 4 proposes only structures for water quality and downstream fish passage, shifting the release of stored water from the Spring to the Summer and Fall, and augmenting instream flows with water in the power and inactive pools. Alternative 4 proposes the "Integrated Temperature and Habitat Flow Regime" operation, the targets of which are generally higher and more variable than those in the congressionally authorized minimum flow requirements proposed under Alternative 1. Alternative 4 also proposes the most structural measures for fish passage and water quality of any alternative. In contrast to Alternative 1, Alternative 4 includes a fish passage structure and water temperature control tower at Hills Creek Dam and a fish passage structure at Cougar Dam but uses operational measures to utilize the spillway and ROs for temperature management at Green Peter Dam.

2.2.3.2.8 Alternative 5. Refined Integrated Water Management Flexibility and ESA-Listed Fish Alternative (Includes Operational Downstream Passage at Cougar – Drawdown to Diversion Tunnel) - Preferred Alternative in Draft EIS

Alternative 5 was identified as the Corps Preferred Alternative in the Draft EIS. Alternative 5 improves fish passage through the WVS dams using a combination of modified operations and structural improvements, along with measures to balance water management flexibility and meet ESA listed fish obligations. Following the review of the alternatives' modeling results, the Corps initially identified Alternative 2B as the Preferred Alternative. However, after engaging with cooperators the Corps determined the integrated temperature and habitat flow regime proposed in Alternative 2A and 2B should be refined to improve outcomes for ESA species. Alternative 5 is the same as Alternative 2B except the refined integrated temperature and habitat flow regime have replaced the integrated temperature and habitat flow regime.

2.2.3.2.9 Interim Operations Measure and construction of the Foster Warm Water Supply Pipe – Selected Federal Action

Alternatives 2A-5 included the Interim Operations Measure which combined several operations for interim implementation into a singular measure (Table 3). These operations provide improved fish passage and water quality until the Corps can implement the structural or long-term operational measures at a particular project. The Corps analyzed the effects of the Interim Operations over the 30-year implementation timeframe, ensuring analysis of a full range of potential impacts because the duration of operations at a particular location is uncertain as structural modifications to a project requires design, environmental compliance, and ultimately construction of the modification.

These operations were based on the injunction operations ordered by the District Court. These operations were refined to incorporate the final NMFS Biological Opinion issued on December 26, 2024.

Table 3: Interim Operations in the Selected Federal Action[1].

Location	Description of Interim Operations	Duration of Operation	Priority Outlet	Target Elevation
Detroit	Spring downstream fish passage and operational downstream temperature management	Mid-Mar to Fall	Spillway/ Turbines/ Upper ROs/Lower ROs	n/a
Detroit	Continue fall temperature operations to target elevation 1450 feet.	Fall/Winter	Turbines/ Upper ROs/Lower ROs	1450 feet

Location	Description of Interim Operations	Duration of Operation	Priority Outlet	Target Elevation
Big Cliff	Spread spill across as many spillways as safety protocols allow to reduce downstream TDG exceedances	Year-round	Spillway	Discharges greater than powerhouse capacity
Green Peter	Out planting plan for reintroduction of adult Chinook salmon above Green Peter Dam	Summer	n/a	n/a
Green Peter	Downstream passage for Green Peter using spring spill	Spring	Spillway	Greater than 970 feet
Green Peter	Green Peter deep drawdown for improved downstream fish passage	Fall/Winter	ROs	780 Feet
Foster	Delay refill and utilize spillway in the spring for improved downstream fish passage; use the fish weir in the summer for improved downstream temperature management and upstream fish migration/passage	Feb 1 to June 15; June 16 to approx. late-July	Spillway (spring) Fish Weir (summer)	613 feet (Feb - May); 637 feet (May - Jul)
Foster	Early drawdown and utilization of the spillway for improved downstream fish passage in the fall	October - mid-December	Spillway	613 feet
Cougar	Deep drawdown and RO prioritization for improved downstream fish passage	Early Nov to Dec 15	RO	1,505 feet
Cougar	Delayed reservoir refill and RO prioritization for improved downstream fish passage	Feb to May/Jun	RO	1,520 -1,532 feet

Location	Description of Interim Operations	Duration of Operation	Priority Outlet	Target Elevation
Hills Creek	Nighttime (6PM to 10PM) RO prioritization for improved downstream fish passage when elevation less than 1,460 feet	Approx. Nov to Mar	RO	Less than 1,460 feet
Lookout Point	Utilize spillway for improved downstream fish passage in the spring; RO use in the late summer/fall for downstream temperature management	Mid-Mar to May/Jun (spring); Jul to Oct 15 (RO)	Spillway/ RO	890 to 893 feet spring spill Less than 887.5 feet late summer/ fall RO
Lookout Point	Deep drawdown and RO prioritization for improved downstream fish passage	Nov 15 to Dec 15	RO	750 feet
Fall Creek	Fall Deep Drawdown for improved downstream fall/winter fish passage.	November	ROs	690 feet

[1] *In accordance with procedures in the Adaptive Management Plan (Appendix N of the Final EIS), specific dates, durations, and target elevations of interim operations shown here may be refined.*

The operations listed in the chart were part of the Action Agencies' Proposed Action and were incorporated into the Reasonable and Prudent Alternative in the NMFS 2024 Biological Opinion. The Corps excluded the RPA's deeper fall drawdown to elevation 1395' at Detroit for downstream fish passage from this ROD because it was not included in the interim operations measure which underwent public review and comment in the Draft EIS. It will be analyzed as part of the interim operations measure in the supplemental EIS.

In addition to the interim operations, the Corps proposes to construct the Foster Warm Water Supply Pipe as required by the NMFS 2024 Biological Opinion's RPA as part of this ROD. Temperature control at Foster Dam currently targets a narrow range of forebay elevations. A smaller intake structure proposed at Foster Dam would pass warm water during the Spring and Summer months. Construction would bore a hole through Foster Dam, attaching the prefabricated intake structure to the face of the dam using barge mounted cranes, and then install the mechanical and electrical systems. This action is common to all action alternatives.

2.2.3.2.10 Environmentally Preferred Alternative

The environmentally preferred alternative is Alternative 2A. The Corps deemed Alternatives 2A, 2B, and 5 similar in their effects on ESA listed species because they have the highest level of fish persistence. However, 2A does not include the Cougar Diversion Tunnel Operation like alternatives 2B and 5. The operation is likely to result in a large amount of sediment moving downstream from behind the dam during the first few years of implementation. This adverse effect would not occur under 2A. For further comparison of the environmental effects of each alternative see EIS Chapter 3 and Appendix A, Attachment 4.

Section 2.2.3.3 Public Engagement

Agencies must provide the public an opportunity to engage early in the EIS process during public scoping and make Draft EIS available for the public to review and comment via a Notice of Availability posted to the Federal Register. The decision maker then considers the public's input prior to executing a ROD.

2.2.3.3.1 Scoping

Public involvement begins with scoping, which is the process of soliciting input from Tribes and stakeholders such as private citizens and non-governmental organizations and other agencies to identify significant issues related to the Proposed Action. Scoping for the EIS began on April 1, 2019, with publication of a Notice of Intent in the Federal Register (Vol. 84, No. 62, pp. 12,237–12,238). The Notice of Intent described the Corps intent to prepare this EIS to address continued operations and maintenance of the WVS in accordance with Congressionally authorized purposes while meeting ESA obligations to avoid jeopardizing the continued existence of ESA listed species. The Corps accepted scoping comments until June 28, 2019. The Notice of Intent notified the public of five scoping meetings held from June 4 to 13, 2019. The Corps advertised the meetings in 15 newspapers, press releases, flyers, the EIS website, email distributions, and social media.

The Corps received 384 comments from private citizens, non-governmental organizations, government agencies, and Tribes. *The Willamette Valley System Operation and Maintenance Programmatic Environmental Impact Statement Public Scoping Report* includes details on the scoping process and comments, a database of comments received, and all scoping materials (See Final EIS Chapter 6 and Appendix P, Public Scoping Report.)

2.2.3.3.2 Virtual Outreach

In 2021, the Corps released a publicly accessible Virtual Room, an interactive website organized as a three-dimensional public meeting room with clickable boards that provided information on the status of the EIS. The information provided included an overview of the WVS EIS background and process, including the alternatives formulation process. Following release of the Virtual Room, the Corps held an informational public meeting, during which the Corps subject matter experts presented

the alternatives formulation process and resulting alternatives. The Corps fielded questions from attendees during the meeting, but did not record formal comments.

2.2.3.3.3 Public Comments on the Draft EIS

The Corps published a Notice of Availability for review and comment of the Draft EIS in the Federal Register on November 25, 2022. This marked the start of the 45-day public comment period. The Corps provided notice in the Federal Register extending the public comment period to 90 days. The final 90-day comment period closed on February 23, 2023.

The Draft EIS was available for review on the Corps Portland District website. Eight hard copies were available at local libraries throughout the Willamette Valley. The Corps requested review comments from Cooperating Agencies, Tribes, Federal, state, and local agencies, parties and organizations which may be interested or affected by the Proposed Action, and the public.

Six public meetings had a total attendance of 259 participants including Federal, state, and local agency representatives, representatives from interested stakeholder groups, non-governmental organizations, tribal members, and members of the public. A summary of the public comments and responses is in Appendix V, Draft EIS Public Comments and Responses.

2.2.4 Endangered Species Act

Congress enacted the Endangered Species Act (16 U.S.C. §§ 1531–1544) to protect and conserve endangered and threatened species and critical habitat. Requirements of the ESA ensure activities authorized, funded, and carried out by Federal agencies are not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of the designated critical habitat of a listed species.

Listed species in the analysis area for the operations and maintenance of the WVS include bull trout (listed as threatened in 1998), Upper Willamette River (UWR) Spring Chinook salmon (listed as threatened in 1999), and UWR Winter Steelhead (also listed as threatened in 1999). Southern Resident killer whales are ESA listed as endangered, but they do not inhabit the analysis area. However, they could be minimally impacted by the quantity of UWR salmon species as a prey source. Upper Willamette River salmon species comprise only a small percentage of Southern Resident killer whale diet, and the hatchery mitigation program would continue to provide salmon available as prey. Northwestern pond turtles were candidates for listing as a Federally threatened species under the ESA as of April 2025.

To comply with obligations under 50 C.F.R. § 402.16, The Corps has consulted with the NMFS and USFWS to address listed species issues analyzed in this EIS. These formal consultations began after the action agencies submitted the final biological assessment on March 13th, 2023, to both NMFS and USFWS.

National Marine Fisheries Services executed its Biological Opinion for the WVS on December 26, 2024, prior to the passing of WRDA 2024. The Corps consulted on the preferred alternative which included the interim operations and Foster Warm Water Supply Pipe improvement, and both are in the Biological Opinion.

The consultation with USFWS is ongoing. As part of the formal consultation, the Corps and USFWS have determined the interim operations are consistent with the previous 2008 opinion and received an extension. There are no impacts to Bull Trout or their designated habitats, not previously considered in the prior consultation, that will occur prior to USFWS issuing a final Biological Opinion.

Additionally, the Foster Warm Water Supply Pipe will undergo site specific consultation with NMFS and USFWS for construction impacts.

2.2.5 National Historic Preservation Act

Section 106 of the National Historic Preservation Act of 1966, as amended, requires Federal agencies evaluate and mitigate the adverse effects of Federal undertakings on historic properties eligible for listing in the National Register of Historic Places (54 U.S.C. 300101 et seq.). The Act also requires the Federal agency include the State Historic Preservation Office, Indian Tribes, representatives of local governments, and the public in findings and determinations made as part of the Section 106 process. The Advisory Council on Historic Preservation generally oversees the Section 106 process and retains the right to comment on the proposed undertakings.

The Corps consulted with 20 Federal, state, county, tribal, and heritage preservation organizations, including the Advisory Council on Historic Preservation, the State of Oregon, the Confederated Tribes of the Grand Ronde Community of Oregon, the Confederated Tribes of the Siletz Indians, the Confederated Tribes of the Warm Springs Reservation of Oregon, and the Cow Creek Band of Umpqua Tribe of Indians, under Section 106 of the National Historic Preservation Act and executed a Programmatic Agreement. The Advisory Council on Historic Preservation and State Historic Preservation Office are signatories to the Agreement and the Confederated Tribes of the Grand Ronde Community of Oregon, the Confederated Tribes of the Siletz Indians, the Confederated Tribes of the Warm Springs Reservation of Oregon, and the Cow Creek Band of Umpqua Tribe of Indians were invited signatories.

Section 3. Final Agency Finding

After reviewing the benefits, environmental effects, and unavoidable adverse impacts of the Interim Operations Measure and Foster Warm Water Supply Pipe Measure as detailed in the Final EIS and this ROD, and thorough considerations of the views of Tribes, Federal, state, and local agencies, and public comments, the Corps selects the Interim Operations Measure and Foster Warm Water Supply Pipe Measure for implementation of the ongoing operations and maintenance of the WVS. The Corps considered all applicable laws, regulations and executive orders in evaluation of these

actions and alternatives. Until such time the Corps can comply with the requirements of Section 1326 of WRDA 2024, this Record of Decision completes the National Environmental Policy Act process.

Based on the analysis and findings in this ROD, the Draft and Final EIS, input of the public, and the review by my staff, I select only the federal actions described in this ROD: Interim Operations Measure and construction Foster Warm Water Supply Pipe, and conclude that they comply with applicable laws, including the ESA. I find the selected federal actions best balance the human and natural environment in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which people and nature can exist in productive harmony, and to fulfill the social, economic, and other requirements of present and future generations of Americans while longer-term options are further analyzed consistent with Section 1326 of WRDA 2024. I have also considered tribal treaty rights and the United States' trust responsibilities to the Tribes in selecting these actions. The Corps implemented actions will improve salmon survival, which will benefit tribal fisheries. Therefore, the Corps is deciding to operate its 13 Willamette Valley System projects according to the description of the Interim Operations Measure and the Foster Warm Water Supply Measure.

May 13, 2025

Date

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William C. Hannan, Jr.
Brigadier General, U.S. Army
Commanding

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

	Case
David White P1	$450 Million COMPLAINT FOR
18965 NW Illahe St	DECLARATORY JUDGEMENT,
Portland, Or 97229	INJUNCTIVE RELIEF, AND DAMAGES.
	JURY TRIAL REQUESTED

Dave@salmonprotectiondevice.com

v.

Amy van Saun, as President D1 et al
NORTHWEST ENVIRONMENTAL
DEFENSE CENTER,
newa@northwestenvironmentaladvocates.org
P.O. Box 12187
Portland, OR 97212-0187
503/295-0490

Betsy Gaines Quammen D2 as
president of WILDEARTH GUARDIANS
info@wildearthguardians.org
301 N. Guadalupe St., Ste. 201
Santa Fe, NM 87501
Ph. 505.988.9126,

Native Fish Society D3
Mark Sherwood as Executive Director
NATIVE FISH SOCIETY
PO Box 1536, Oregon City, OR 97045
Office: 503.344.4218
mark@nativefishsociety.org
Army Corp of Engineers D4
NATIONAL MARINE FISHERIES SERVICE D5

Defendants

Attorneys for Defendants D1-D3

Kaitlyn Poirier
United States Department of Justice
Environment & Natural Resources Division
Ben Franklin Station
P.O. Box 7611
Washington, DC 20044
Michael R. Eitel
United States Department of Justice
Environment & Natural Resources Division
Ben Franklin Station
999 18th Street, South Terrace, Suite 302
Denver, CO 80202

Class action Members:

INTRODUCTION

Cause of action

1 Case 18-cv-00437-HZ ruling was based on incomplete science and Plaintiffs using Federal Department of Justice Attorneys to sue the government. This is 18 USC 11 conflict of interest. Specifically Section 203 87-849 Conflict of Interest Provisions of Public Law.

2 Furthermore, the ruling said to drain the dam to release the massive silt behind it (The silt is around 775 feet tall according to an Operator of the dam). The result was dark colored water running from Linn County their faucets. The clean water act specifically prevents this: the provisions of the Federal Water Pollution Control Act, specifically 33 U.S.C. 1251 a. 1-7. This is also 42 USC CHAPTER 6A, SUBCHAPTER XII: SAFETY OF PUBLIC WATER SYSTEMS.

The clean water act prevents discharge of silt from any dam. Specifically Section E 1 as the required public meetings for this single subject were not scheduled. No Judge can violate this. https://www.epa.gov/cwa-404/overview-clean-water-act-section-404

The previous case ruling is a violation of Oregon law ORS 496.705, resulting in damage suits for negligent, but unlawful killing of wildlife. The uninformed action on Green Peter Dam caused thousands of fish to die.

This is Endangered Species Act, specifically Section 11. Penalties and Enforcement 1 a. Defendant's solution for Salmon in the Willamette Valley Oregon is junk science at best. Defendants killed more COHO Salmon than they saved.

This is a violation of) 18 U.S. Code § 41 - Hunting, fishing, trapping; disturbance or injury on wildlife refuges. Specially section 676. Hunting, trapping, killing, or capturing game on Norbeck Wildlife Preserve unlawful.

Plaintiffs request the court to consider the Oregon Coast is a wildlife

preserve as it is. https://www.fws.gov/refuge/oregon-islands

Additionally, now section 404 permit for the drawdown because it was court ordered. This is a violation of Clean water act as: 33 CFR Parts 320-332) authorizes the Corps to issue permits for the discharge of dredged or fill material into navigable waters. Jurisdictional waters were later expanded to include “waters of the United States” for section 404 purposes.

There is no legal or scientific reason to remove any dam. Fish ladders work if properly maintained. If a fish ladder on a dam doesn’t work check with the operators of the dam to find out, why. The injunction is to vacate the erroneous ruling in 18-cv-00437-HZ, because nobody but Plaintiff had the common sense to check with the operator of the dam.

State a claim

1. Class Action members and Plaintiffs are harmed (directly affected) by the proposed loss of hydroelectric, clean energy, projected for the next decade.

2. Class Action members and Plaintiffs are harmed (directly affected), by the proposed drawdowns because of resulting, silt-laden, dark colored water running from their faucets.

3. Class Action members and Plaintiffs are harmed (directly affected) by the local municipal city and county water systems using up all available water filters in a few days following the most recent Green Peter drawdown.

Plaintiff visited Green Peter dam with his sister and talked to one of the operators of the dam. Plaintiff was told that the silt has built up to 775 feet above the stream bed on the upstream side, and the fish ladder at 525 feet has been plugged with silt since 1989. This has produced direct harm to Plaintiff and Class Action members.

4. On the way home Plaintiff called the Oregon State University Professor who published the incomplete science report in a predatory journal. In twenty minutes, Plaintiff convinced him that their proposed draw-down solution was much worse than the problem because it suffocated the fish. He agreed to the dredge proposal.

5. Plaintiff's sister will testify to this conversation.

6. Defendants failed to consult with the true local stakeholders living close to the affected dams to discover the correct solution. They seem to lack good investigative skills required by the scientific method, choosing rather to rely on purveyors of incomplete science to support a favored, preconceived hypothesis.

7. There is no legal or scientific reason to remove any dam. Fish ladders work if properly maintained. If a fish ladder on a dam doesn't work check with the operators of the dam to find out, why.

Therefore, the Statement of Claim requirement in this case has been satisfied.

https://www.northwestobserver.com/index.php?ArticleId=3356

42 USC CHAPTER 6A, SUBCHAPTER XII: SAFETY OF PUBLIC WATER SYSTEMS the provisions of the Federal Water Pollution Control Act [33 U.S.C. 1251 a, 1-7 (1)it is the national goal that the discharge of pollutants into the navigable waters be eliminated by 1985;

8. There is no reason to do the Detroit lake drawdown. The issue they have is the fingerlings heading back to the ocean can't find the fish ladder because it's at the wrong height. I told the Corp in a meeting in sweet home about the need to put a stainless steel fence on the upstream side of the dam to prevent the fingerlings from going through the dam. Then the leaders of the schools of fish will find the fish ladder and go down it.

9. The BiOP is based on junk science. This is fish biologists on the East coast of the USA telling the Northwest what to do for dams with almost no input from the west coast. US Case 25-5725 White vs. FERC makes the 2008 and 2024 BiOP's Null and Void.

This is a violation of 33 U.S.C Chapter 26. From the BiOP page 1245

The 2024 BiOP does not say to drawdown Green Peter water.

2.13 Upper Willamette River Chinook Salmon | 1245 (the items talked about climate change are wrong. See Ocean data on cctruth.org)

Crozier et al. (2019) assessed UWR Chinook salmon as having a very high vulnerability to the effects of climate change (cctruth.org no climate crisis) based on an analysis of the ESU's sensitivity (very high) and exposure (high). Further, the species was determined to have a moderate adaptive capacity. A moderate score for adaptive capacity reflected the conclusion that although UWR Chinook salmon exhibit a remarkable ability to survive in such a highly altered system, it is unclear whether the ESU has further adaptive capacity, given its elevated extrinsic pressures and depressed natural production.[417]Modified environments available to Chinook salmon in the Willamette River have exerted powerful selection pressures, such that the ESU itself may be fundamentally transforming. For example, in Green

Peter Reservoir, individuals have been collected that appear to have completed their entire life cycle in fresh water as the offspring of adfluvial parents rather than as hatchery releases (Romer and Monzyk 2014). Use of reservoirs may be under-reported, as are other juvenile life-history patterns (Bourret et al. 2014). However, the extent to which alternate rearing patterns represent either a viable strategy or an ecological trap is unknown (Bourret et al. 2014). Nonetheless, actions to modify reservoir operations to benefit juvenile production are being considered (Johnson and Friesen 2014), despite uncertain outcomes.

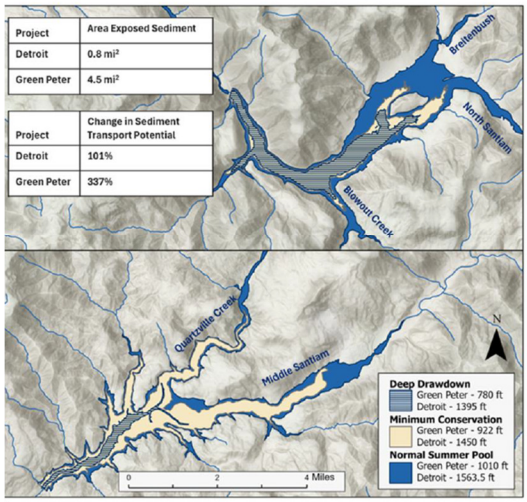
Exposure attributes for UWR Chinook salmon were ranked high overall, due to very high scores for ocean acidification (not true see ocean data on cctruth.org) and stream temperature. Mean August temperature was

projected to increase 2.5°F by the 2040s, and 4.3°F by the 2080s. (fake models not benched marked with actual data. Other high exposure attributes included sea surface temperature, (not increasing latent heat of vaporization keeps a constant temperature) and hydrologic regime shift. Although approximately 90 percent of the basin is already rain-dominated, the remaining 10 percent is very likely to change to rain-dominated by the 2040s. Scores for ocean acidification and sea surface temperature (no they were not. That is junk science), were similar to those of most ESUs. Sensitivity attributes for this ESU were ranked very high due to a host of factors, including vulnerability in the adult freshwater stage and cumulative threats to the species' entire life cycle and to its life-history diversity. This projection is false. Latent heat of vaporization keeps the ocean and streams constant Temperature.

10. The Northwest Grid is crashing. Plaintiff went to a Cascade policy institute where Grid Expert John A. Charles, Junior on October 18th 2023 showed the Northwest Electric Grid is 2.2 Gigawatts short. Now with the Klamath River Dams gone the grid is negative 2.375 gigawatts. The seven dams in question are almost one gigawatt of clean renewable power.

11. Defendants solution for Salmon in the Willamette Valley Oregon is junk science at best. Defendants killed more COHO Salmon than they saved. This is a violation of 18 U.S. Code § 41 - Hunting, fishing, trapping; disturbance or injury on wildlife refuges. Specially section 676. Hunting, trapping, killing, or capturing game on Norbeck Wildlife Preserve unlawful. Plaintiffs request the court to consider the Oregon Coast is a wildlife preserve as it is. https://www.fws.gov/refuge/oregon-islands

Potential Deep Drawdown Impacts



Green Peter and Detroit Drawdown Areas

Source: US Army Corps of Engineers

Santiam River Confluence during the 2023 deep drawdown of Green Peter Dam

This image shows clearly violation of clean water act from the green peter dam drawdown. The north Santiam river will look the same if Detroit Dam has a drawdown.

12. As of November 3rd 2025 No Dam in the USA or its territories may be removed or have its turbines removed without specific permission of salmonprotectiondevice.com

The 2008 and 2024 Biological Opinions are junk science and void.
https://salmonprotectiondevice.com/Dam_Removal_Application.pdf

https://salmonprotectiondevice.com/Dam_removal_Approval_Procedure.pdf

https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25-5808.html

Nov 06 2025		DISTRIBUTED for Conference of 11/21/2025.
Nov 03 2025	Waiver of right of respondent FERC to respond filed. **Main Document**	

Attorneys for Respondent

D. John Sauer
Counsel of Record

Solicitor General
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
SUPREMECTBRIEFS@USDOJ.GOV
Ph: 202-514-2217
Party name: FERC

JURISDICTION

Federal court in Oregon has jurisdiction because the Clean Water act is a

federal act. Defendants violated many provisions of the clean water act.

Venue

The U.S. Army Corps of Engineers (USACE), (Corps) is studying eight dams to remove hydropower capabilities based on a fake East Coast biological opinion.

Why are people from Oregon listening to some East Coast woke bureaucrat who doesn't know what they are talking about.

Salmonprotectiondevice.com has garnered much **r**espect in the Ninth Circuit Court of Appeals and in the U.S. Supreme Court for exposing this kind of fake science.

LEGAL STANDING

Plaintiff and Class Action members have personal legal standing.

Plaintiff's legal standing is based on the federal laws broken by defendants and overwhelming support by local stakeholders (Class Action members). Plaintiff also is a long time Oregonian who grew up in Western Oregon. Plaintiff's family hunted, camped, and fished around the areas affected by this Complaint and the Klamath area. Plaintiff is extremely distraught to see the destruction of an area he and his family loved as a child and still treasures.

Conclusion

To improve all salmon and other fish runs, the fish ladders need to be improved and the sediment build-up behind the dams (from almost 100 years) needs to be dredged up and removed. Salmonprotectiondevice.com has the NOAA Fisheries approved fish ladder design criteria. Around $30 million is the cost to dredge behind each dam.

A Section 408 and Joint Permit Application are underway. Plaintiff's

brief clearly shows the violation of the FRCP 404, (Clean water act) which

resulted in the death of numerous endangered species.

Many valid reasons have been given as to why the Preliminary Injunction in

must be granted by the Court.

Relief Sought

FIRST CLAIM FOR RELIEF

1. Plaintiff and Class action members humbly request the Federal Court

to vacate by FRCP 60 (2) the erroneous ruling in 18-cv-00437-HZ.

published in a predatory journal.

which was based on incomplete and misguided scientific analysis.

SECOND CLAIM FOR RELIEF

2. Plaintiff and Class action members humbly request the Federal Court

to order defendants pay dredging costs behind Green Peter and the other

dams affected by 18-cv-00437-HZ This cost is estimated to be around $30 to $50 million per dam.

THIRD CLAIM FOR RELIEF

3. Plaintiff and Class action members humbly request the Federal Court to order removal of DOJ attorneys from defendant's Counsel. Using DOJ legal counsel for other than a whistle blower case is 18 USC 11 Conflict of interest.

Defendants must pay the dredging costs for all the dams affected by the order.

Respectfully Dated: 11/18/2025
David White
Salmon Protection Device

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2025, a true and correct copy of the above document was electronically filed with the Clerk of the Court using

CM/ECF. A copy of the document will be served upon interested parties via the Notices of Electronic Filing that are generated by CM/ECF. Additionally, a courtesy copy is being provided as follows:

Attorneys for Defendants D1-D3
Kaitlyn Poirier
United States Department of Justice
Environment & Natural Resources Division
Ben Franklin Station
P.O. Box 7611
Washington, DC 20044
Michael R. Eitel
United States Department of Justice
Environment & Natural Resources Division
Ben Franklin Station
999 18th Street, South Terrace, Suite 302
Denver, CO 80202
webcontentmgr.enrd@usdoj.gov

___ Via hand delivery
___ Via U.S. Mail, 1st Class,
Postage Prepaid
___ Via Overnight Delivery
___ Via Facsimile
XX Via Email
XX Via CM/ECF notification
to the extent registered DATED: December 17th , 2025.
By: David White

David C. White Pro Se. December 17th , 2025

No.25-5808
IN THE SUPREME COURT OF THE UNITED STATES

DAVID C. WHITE Petitioner
V.
Respondents
Federal Energy Regulatory Commission (FERC)
Commissioner David Rosner R3
Commissioner Lindsay S. See R4
Commissioner Judy W. Chang R5

On Petition for Rehearing of Docket 25-5808 by Rule 44. **Amended**

Extraordinary Writ of Prohibition, Mandamus by Rule 20.

D. John Sauer
Counsel of Record
Solicitor General
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
SUPREMECTBRIEFS@USDOJ.GOV
Ph: 202-514-2217

SUMMARY

It will cost roughly $1.5 trillion (with a “t”) dollars for the United States to replace the four dams that Federal Energy Regulatory Commission (FERC) licensees Klamath River Renewal Corp (KRRC) incompetence destroyed on the Klamath River and clean up the toxic silt that destroyed all life in the river below the dams.

This Rehearing is requested, with all due respect, because failure to grant this Writ allows gross negligence and other violations of the Clean Water Act by 33 U.S.C. §1251, 22–451 June 28th, 2024 Federal Case number 22–451 to go unpunished, by Loper Bright Enterprises and many other Constitutional provisions. Judging from their defunct emails, two FERC Commissioners, Chairman Phillips (R1) and Christie (R2), are no longer with the agency, apparently due to Malfeasance.

Petitioner postulates somebody higher up was clearly ram-rodding this project at breakneck speed because our initial Injunction in the Federal Court to Stop Work was denied (Case 1:24-CV-1301-MC) by Federal Court in Medford Oregon), contrary to law by the Court of first instance. But recently Solicitor General, D. John Sauer, filed a Waiver of Right of Respondent (FERC) to Respond on Nov 03, 2025.

This indicates that failure to approve this Writ would perpetuate a deadly threat for human and animal life in the Klamath River Basin. FERC

malfeasance unleashed an environmental catastrophe far worse than the Exxon-Valdez oil spill of the last century. FERC is accessory after the fact by 18 USC 3 for licensee KRRC killing 2000 fish and no less than one herd of Elk. This is also a violation of 16 USCA § 1532, endangered species act, and a violation of 18 U.S. Code § 41, having no license to kill wildlife.

It is likely these two Commissioners were fired because Respondents violated their own rules and federal law by not conducting any public hearings in the affected areas of Klamath Falls, Oregon and Yreka, California. Respondents illegally relied solely on the state Governors who had already approved giving Klamath River Renewal Corp (KRRC) half a billion dollars to take out the four dams.

FERC violated their own rules by ignoring County wide votes in Klamath and Yreka County's polling where about 80% didn't want dams removed, ignoring 2017 California Water Board testimony, and ignoring 2009-2011 Interior Department sponsored chemistry testing.

These test results appear In Chapters 2 and 3 of the Report to prove that the silt behind the dams and now on the river side is highly contaminated and highly toxic with Arsenic and Chromium 6.

On the other hand, Petitioner in February 2021 confirmed this by setting up a table at the only super-market in Klamath Falls and handed out 500

documents explaining why there was no need to take out the Dams; 499 of 500 agreed after being informed.

The lower court judges deserve dismissal by 28 U.S. Code § 455 **f**or their inexcusable failure to prevent these crimes in progress, which is tantamount to Misprision of Felony by the very government entities commissioned to prevent it. Any such breakdown in the legal system is a signal of a nation's imminent collapse. We dare not ignore it.

Only the U.S. Supreme Court can correct this tragedy by granting this Writ. As this Writ ably demonstrates, lower court judges who dismiss a case when the Defense abandons its argument by default are guilty of Misprision of Felony by 18 U.S.C. 4. They are informed of an alleged crime, but then fail to investigate or adjudicate it by due process of law. How can the Court discipline notorious, longstanding offenses in the 9th Circuit if it, permits itself to engage in a similar failure.

The Federal Energy Regulatory Commission (FERC) (Respondents) capitulated, and thus confessed to the alleged crimes, not only because their legal counsel filed Waiver of Right of Respondent (FERC) to respond on Nov 03, 2025, but because they know FERC is guilty of providing a license to remove dams by illegal cherry-picking data. Respondents listened exclusively to unscientific, emotional appeals of

upstream tribes and completely ignored all other testimony adamantly opposed. The alternatives could have satisfied everybody, including the tribes. Because of this, two FERC commissioners are no longer with the agency. As with U.S Supreme Court docket 25-5660, Petitioner strongly urges the Court not to accept any opinion or ruling from the 9th circuit courts, which are convened under illegal administrative law by 22–451 June 28th, 2024 Federal Case number 22–451 in Loper Bright. Ninth Circuit Courts ruled that six dockets and six illegal opinions were frivolous, when they clearly were not under Article III.

Petitioner would not have filed the Appeal, if these procedural complaints were unfounded. This was NOT an attempt to retry the case. The magnitude of this gross incompetence lies in the fact that it will take 1.5 trillion (with a "t") dollars to replace these invaluable public assets.

https://thelawisyourattorney.com/loper-bright-enterprises/

https://legalknowledgebase.com/why-would-the-supreme-court-reject-a-write of certiorari

GROUNDS

Vital Strength and Legal Weight Of Default Judgment:

In this Petition for Rehearing by Rule 44, Petitioner states the grounds briefly and distinctly. Petitioner begs the U.S. Supreme Court for

Rehearing on the merits of 25-5808. This petition is presented in good faith in the U.S. Supreme Court and not for delay. Respondents are in default based on the timeline established by Rule 55 when they were duly served the original Writ in docket 25-5808. Respondent Legal Counsel filed to capitulate on November 3rd when their legal counsel; Solicitor General D. John Sauer, filed Waiver of Right of Respondent FERC to Respond.

The legal irregularity of this dismissal is why this Petition for Rehearing by Rule 44 is filed in this docket. With all due respect, the Court has failed to follow Federal rules regarding the strength and legal weight of a default judgment and the conditions for overturning it. The Supreme Court is bound to these rules by Article VI of the U.S. Constitution, which requires that "This Constitution, and the Laws of the United States which shall be made in Pursuance thereof ... shall be the supreme Law of the Land; and all executive and judicial Officers, both of the United States and of the several States, shall be bound by Oath or Affirmation, to support this Constitution;" any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.

Surely, failure of the judiciary to uphold these federal laws "made in pursuance thereof" is a lapse of "good behavior" required by Article III.

According to Rule 55 – made in pursuance to the U.S. Constitution -- a default judgment is a final, legally binding decision. It resolves all questions of liability presented in the initial complaint.

The winning party (Petitioner) can take action to collect on the judgment, which may include, for example, wage garnishment, bank account levies, or property liens. Plaintiff has presented an overwhelming *quantum* of admissible evidence that justifies the relief requested, in the Writ filed based on the merits, as demonstrated below.

Vital Conditions For Overturning Of Default Judgment:

Moreover, the conditions for overturning a default judgment by Rule 55 have not been met. Dismissal requires the defaulting party to actively file a motion to set it aside. (FRCP 60)

No such motion has been filed by the defaulting party. Respondents have abandoned their argument by filing to concede, and the Court therefore,

with all due respect, has no authority to deny it under the Constitution. A volunteered confession is the strongest evidence possible.

It is this very practice of arbitrary and subjective, judicial discretion – resulting in Misprision of Felony by 18 U.S.C. 4 -- that has frustrated U.S. Citizens in the 9th Circuit for decades. How can the Court discipline renegade judges in the 9th Circuit if it winks a legal eye at the very same trespass?

Such a motion to overturn a default judgment requires the defaulting party to demonstrate Good Cause or some reasonable excuse for failing to file a timely answer or appear in court, such as improper service of process, a medical emergency, fraud, or a legitimate mistake.

In addition, the defaulting party must show a valid, justifiable reason

or Meritorious Defense, for their claims. This means that the outcome of the case might be different if they were allowed to present their side, as demonstrated by an affidavit or sworn statement outlining the facts of their defense. But again, no such affidavit was provided in a prompt or timely Manner; instead a confession was presented.

Vital Procedural Violations:

Reinforcing the FRCP 55 default in Docket 25-5808, FERC formally capitulated and two FERC commissioners, including the Chairman, were removed. How can the Court simply ignore and dismiss this confession and associated FRCP 55 requirements? How is justice served by such a denial, which results in Misprision of Felony by 18 U.S.C. 4, when the alleged crimes are confessed, but then ignored with no due process of Law?

Vital Legal Violations:

Under Rule 55 there are only four legitimate reasons for denying a Writ:

1. Writ formatted wrong.

2. Writ doesn't prove the case.

3. Writ contains erroneous factual findings or the misapplication of a properly stated rule of law.

4. The petitioner contends not that the lower court interpreted the law incorrectly, but that the court ~~simply~~ applied the law wrongly to the facts of that case, due to its convening as an illegal Administrative Law Court.

None of 1-4 are applicable. The Writ is formatted correctly with many core legal Questions referenced in the Statement of the Case. The Writ presents factual findings of federal laws violated by Respondent's Licensees. The lower court is clearly biased against Pro Se, dismissing six well-documented Appeals in the 9th Circuit as frivolous when The dockets clearly were not. The 9th Circuit Justices failed to adjudicate every one of Plaintiff's cases filed, in spite of being well-documented with clear and convincing evidence of felonies.

In addition, six factors must be present before the U.S. Supreme Court will review a lower court decision:

- A substantial federal question must be present. It must be a real question.

- The federal question must be crucial to the decision.

- The losing party must have exhausted all state remedies.

- a United States Court of Appeals has entered a decision in conflict with the decision of another United States Court of Appeals on the same important matter;

- or has so far departed from the accepted and usual course of judicial proceedings, or sanctioned such a departure by a lower court, as to call for an exercise of this Court's supervisory power;

- a state court or a United States court of appeals has decided an important question of federal law that has not been, but should be, settled by this Court, or has decided an important federal question in a way that conflicts with relevant decisions of this Court.

https://www.law.cornell.edu/rules/supct/rule_10

It is abundantly clear that the Writ meets all the six criteria for acceptance. First of all, several legal definitions of vital importance are presented in Violation of Loper Bright Enterprises that have denied justice to American citizens for decades. The essence of these questions includes, but is not limited to:

- Revisiting the current ambiguous definition of Judicial Immunity by limiting it to Article III Courts and denying it to Administrative Courts.

- Judge dismissing a case as “frivolous” by Administrative Law when defense fails to Appear.

- Judge ruling of “frivolous” without thorough investigation of case facts and law, rather than subjective Judicial Opinion.

- Judge not subjecting frivolous accuser to the same penalty that he attempted to inflict on the accused.
- Liability for Misprision of Felony to Judge who dismisses a case with felonies, when defense fails to appear and thereby Abandons the defense.
- Judge, especially 9th Circuit judges, denying 14th Amendment "equal protection of the law" by illegal use of Administrative Law.
- Shall East Coast pseudo-scientists be denied extra-Congressional authority to control vandalism of West Coast dams?
- Judge failing to rule by scientific dam maintenance protocol: dredging silt, scrubbing poisons, clean or install fish ladder(s).

These questions and definitions are all crucial to the culpability of FERC's negligent incompetence in granting KRCC its license. Plaintiff exhausted all state remedies, including the Oregon Supreme Court, with a ruling of "frivolous" at every level. In the process. The 9th Circuit has entered an Administrative Law decision contrary to the Article III courts of the neighboring 10th Circuit, and others. In fact, virtually all judges in the 9th Circuit have departed from their obligation to convene as courts under Article III in flagrant contumacy of the U.S. Supreme Court landmark decision under Loper Bright Enterprises on June 28, 2024. This demands the Court's supervisory intervention.

Of primary importance, as noted above, is the fact that Respondents were in default, and they abandoned their case by Confession of Guilt in failing to Appear within the 21-day deadline. Thus, there can be no legally defensible reason for denying this Writ.

Scientific Violations In Mitigation Document:

Cherry-picking data to support a false narrative for Klamath Dam removal is wrong scientifically, wrong by FERC's own rules, and illegal because the Chevron doctrine since 2005 was made null and void by 22–451. And yet, virtually all of the justices in the 9th Circuit have persisted in flaunting 22–451 June 28th, 2024 Federal Case number 22–451 in Loper Bright since its enactment on June 28, 2024, refusing to convene as Article III Courts. By refusing this Writ the Court would grant tacit approval for the egregious contumacy of the 9th Circuit to continue unabated. As Petitioner mentioned in the Writ filed in the instant case docket, the 2008 biological opinion was cherry-picked with absolutely no fish biologist comments -- only legislators nationally and locally. Petitioner speculates very few of those opinions garnered had any Fish Biology in college. They mostly have law degrees. Therefore, the 2024 Biological Opinion is the same old cherry-picking, junk science.

There is no legal or scientific reason to remove any dam. Fish ladders

Work if the silt is dredged and the ladders are cleaned or installed. As a clear example, Case 18-cv-00437-HZ in Federal Court in a Portland Oregon ruling was based on incomplete science and Plaintiffs using Federal Department of Justice Attorneys to sue the government. This is 18 USC 11, Conflict of Interest. Specifically, Section 203 87-849 Conflict of Interest Provisions of Public Law.

Furthermore, the ruling required draining the dam to release the massive ramp of silt behind it. This is junk science folly. The silt "ramp" on the upstream side is around 775 feet tall according to an Operator of the dam. The fish ladder on the upstream side sits at 525 feet. The fish ladder has been filled with silt since 1989. The result of the uninformed ruling was dark, colored water running from Linn County faucets. The Clean Water Act specifically prohibits creating this condition: the provisions of the Federal Water Pollution Control Act, specifically 33 U.S.C. 1251 a. 1-7. This is also covered in 42 USC CHAPTER 6A, SUBCHAPTER XII: SAFETY OF PUBLIC WATER SYSTEMS.

The previous case ruling is a violation of Oregon law ORS 496.705, resulting in damage suits for negligent, but unlawful killing of wildlife.

https://salmonprotectiondevice.com/

Plaintiff Expertise For This And Complementary Solutions:

Salmon Protection Device has been awarded the PEER-reviewed contract to install five Salmon Protection Devices on the lowest dam on the Columbia River System: The Bonneville Dam. In effect this is a big cage attached to the base of each fish ladder made of one inch stainless steel rods that gives the Salmon a running chance to escape the hungry sea lions. We have the NOAA Fisheries fish ladder design criteria and can design a fish ladder for any dam to avoid the draconian "solution" of ripping out the dam. My number is 503-608-7611 x 602.

In short, the 2008 and 2024 Biological Opinions are junk science and illegal cherry-picking evidence and testimony. Petitioner requests these Biological Opinions be made null and void by the U.S. Supreme Court. This is explained in the Writ filed in this docket. Based on everything we've seen so far, the data proves that Petitioner, a life-long Chemical Engineer, knows more about fish science than most fish biologists.

Failure to approve this Writ perpetuates a deadly threat for human and animal life in the Klamath River Basin. Below is a warning sign we intend to post on both sides of the river if this Writ is granted. Posting these warning signs is a matter of life and death. Please do not deny local residents this protection.

Please note in the Prayer for Relief section below that Plaintiff has requested assignment of his own company as the qualifying agency for 1) dam removal applications and 2) mitigation document review prior to future FERC permitting.

Petitioner's Prayer to evaluate and approve all dam removals might at first glance appears presumptuous. However, his lifetime of experience as a Chemical Engineer who now teaches college biology at HymarkAcademy.us makes him far more qualified than the "expert" fish Biologists whose incompetence has destroyed the environmental ecosystem in the Klamath River basin. Petitioner was also a lifelong friend and associate of Steve Cramer of www.fishsciences.net/, who was known as "the go-to expert" for salmon research in the Pacific Northwest.

As an example of his expertise in Biology, Petitioner recently "discovered" an enzyme to alleviate type one diabetes.

https://pmc.ncbi.nlm.nih.gov/articles/PMC11637828/

THE SILT ON THE RIVERBANKS IS HEAVY LADEN WITH ARSENIC AND CHROMIUM 6 POISONS FROM THE FORMER IRON GATE DAM ALL THE WAY TO THE OCEAN

.

https://salmonprottectiondevive.com/CDM_2011_0119_ScreeningLevel-Evaluation-of-Contaminants-in-Sediments.pdf

Chapter Three tables in the Department of Interior Report identify arsenic and chromium 6 up to 200 times safe levels in the silt.

DON'T EAT THE FISH

Las tablas del capítulo tres describen el arsénico y el cromo 6 en el limo.

NO SE ACERQUE AL RÍO SIN MÁSCARA DE GAS.

EL LODO ESTÁ CARGADO DE ARSNICO Y CROMO VI.
NO COMAS EL PESCADO

Salmonprotectiondevice.com see Klamath page, 503-608-7611 x602

DAM REMOVAL APPLICATION FORM

Call 503-608-7611 x602 and ask where to submit these documents.

This applies to all private and publicly owned dams in the United States and its territories.

1. Clean water act by 33 U.S.C. §1251 Section 404, 408 or other appropriate section permit.

2. Army Corp of Engineers Joint Application result.

3. Chemistry test of any silt on the upstream side of the dam including mitigation of EPA listed chemicals.
https://salmonprotectiondevice.com/CDM_2011_0119_Screening_Level_Evaluation_of_Contaminants_in_Sediments_1.pdf

4. Does the Dam have a fishway (fish ladder)? If so is it working or filled with silt?

5. Detailed cost of dredging behind the dam.

6. Detailed cost of removing the dam.

https://salmonprotectiondevice.com/Dam_Removal_Application.pdf

https://salmonprotectiondevice.com/Dam_removal_Approval_Procedure.pdf

Upload documents after filling them out here:

https://salmonprotectiondevice.com/dam-applications/

CONCLUSION

In conclusion, for the above reasons this Rehearing should be granted and the relief sought should be awarded. Petitioner prays for the Court to Rehear this case by Rule 44 to confirm that Respondents violated the internal FERC documents against cherry picking data. Respondents violated these by ignoring County wide votes in Klamath and Yreka County's polling where about 80% didn't want the dams removed, ignoring 2017 California Water Board testimony, and ignoring 2009-2011 Interior Department sponsored, chemistry testing.

These test results appear In Chapters 2 and 3 of the Report to prove that the silt behind the dams and now on the river side is highly contaminated and highly toxic with Arsenic and Chromium 6. FERC made no effort to perform any of their own mitigation requirements regarding these things -- including heat scrubbing or chemical scrubbing the silt because the State Governors had already approved half a billion dollars for KRRC to remove the dams.

That was the reason FERC ignored their own mitigation requirements and it may be these two board members were fired because they violated their own rules and federal law by not conducting any public hearings in the affected areas of Klamath Falls, Oregon and Yreka, California. Had FERC conducted these required meetings Respondents would no doubt

have confirmed the 80% disapproval of local stakeholders.

Instead, Respondents relied solely on the Tribes and the state Governors who had already approved giving KRRC half a billion dollars to take out the four dams.

Petitioner confirmed this by setting up a table at the only super-market in Klamath Falls and handed out documents explaining why there was no need to take out the dams. 499 of 500 in agreed after being properly informed. The relief sought in the Writ filed will allow Petitioner to clean up the silt and require that no dam in the United States may be removed without salmonprotectiondevice.com approval.

ADDITIONAL RELIEF SOUGHT

1. In addition to the relief sought in the original Writ filed in the instant docket; Petitioner humbly begs the U.S. Supreme Court to order the 2024 Biological Opinion – and any future "BioOp" - be made illegal for cherry-picking data and is junk science.

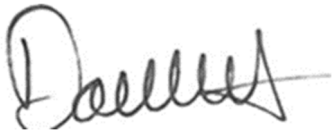
2. Petitioner humbly begs the U.S. Supreme Court to Commission and fund Petitioner's company, Salmon Protection Device a non-profit research corporation, to evaluate and approve or disapprove of all dam removal requests.

3. Petitioner humbly requests the US Supreme Court to Order KRRC to

transfer give their current account balance and account files

(data files) to salmon protection device for every year since

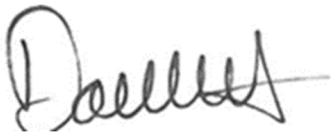
2019.



Certified by David C. White
December 8th 2025.

CERTIFICATE OF SERVICE
I hereby certify that on 12/08/2025, a true and correct copy of the above document shipped filed with the Clerk of the Supreme Court using FedEx. A copy of the document will be served upon interested parties via email by FRCP Four Defaults to State Service Rules, ORCP 9 C 3.
Solicitor General
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
SUPREMECTBRIEFS@USDOJ.GOV
Ph: 202-514-2217
Party name: FERC

Via hand delivery
Via U.S. Mail, 1st Class,
Postage Prepaid
XX Via FedEX two day Delivery
Via Facsimile
XX Via Email
Via CM/ECF notification
to the extent registered:12/08/2025
By: David White



David White Pro Se 12/08/2025

From:	Steve mealey
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Steve mealey
Subject:	[Non-DoD Source] McKenzie River Guides Assn. (MRGA) comments on WVS O&M DSEIS 11/25
Date:	Tuesday, December 30, 2025 10:12:38 AM
Attachments:	MCKENZIE RIVER GUIDES ASSOCIATION SEIS.docx FINAL McKenzie River Guides Association USACE WVS comments (002).docx

---

USACE:

Please see the Attached MRGA comments on the WVS O&M DSEIS (Nov 2025).

Thank you for the opportunity to comment.

MRGA

MCKENZIE RIVER GUIDES ASSOCIATION

P. O. Box 464

Walterville, Oregon 97489

December 30, 2025

U. S. Army Corps of Engineers (USACE)

Attn: CENWP-PME-/Willamette SEIS

P. O. Box 2946

Portland, Oregon 97208-2946

To Whom it May Concern:

Thank you for the opportunity to comment on the Willamette Valley System Operations and Maintenance (WVSO&M) Draft Supplemental Environmental Impact Statement (EIS), November 2025. Since the McKenzie River and its spring Chinook salmon are among our primary concerns, we limit our comments to that part of Alternative 6 that discontinues hydropower production at Cougar Dam, affecting Chinook salmon.

We previously commented on the WVSO&M Draft Programmatic EIS, November 25, 2022. Those comments (2/14/2023) are hereby incorporated into this letter and are also attached. There, we advocated using the regulating outlet (RO) at 1,505' for successful fish passage while meeting turbidity standards. We were pleased to see that the Interim Operations in the Selected Federal Action, outlined in the Record of Decision (ROD) for the WVSO&M Final EIS (Hall, 5/13/2025), required delayed reservoir refill and RO prioritization for improved

downstream fish passage during February to May/June, with RO as the priority outlet at a target pool elevation of 1,520'-1532' (ROD pages 9-10). These operations were refined from the Draft EIS to incorporate the final National Marine Service (NMFS) Biological Opinion (BO) on December 26,2024.

Downstream passage of juvenile salmon at Cougar Dam under Alternative 6 would be provided operationally with a deep drawdown in the fall and spring to 25 feet over the diversion tunnel (DT) or to a pool level of 1,355'. The improved downstream passage through operations at Cougar Dam would result in direct, substantial reductions in adverse effects of the dam, on downstream fish passage. However, operations under Alternative 6 would cause an increase in sediment and turbidity levels downstream of Cougar Reservoir because of deeper drawdowns to near original streambed elevations, increasing bank erosion and sloughing. Fine sediment would be transported downstream resulting in seasonal increased turbidity. As a result of the deep reservoir drawdowns, sediment discharged below Cougar Dam would increase, resulting in short-term moderate, adverse effects on all life stages of fish residing downstream.

Alternative 6 would result in pool levels around 1,355'--- 95' lower than the "1,450 pool" established by the USACE as the minimum pool level to prevent high turbidity levels and high rates of sediment transport downstream of Cougar Dam as occurred in 2002 during construction of the Cougar Dam water temperature control tower. Drawdown to 1,355' under Alternative 6 would also be inconsistent with the BO target pool level (s) (1520'-1532') judged by the NMFS to be sufficient to protect Endangered Species Act protected Chinook salmon.

Compared with the Alternative 6 drawdown level of 1,355” to near the DT, reducing adverse effects to salmon, the pool level of 1,520-1532’ to near the PO outlet specified in the ROD also provides substantial reduction in adverse dam effects *without the unacceptable downstream turbidity effects* of Alternative 6.

Ceasing federal hydropower operations at Cougar Dam as presented in Alternative 6, is clearly not the best option to benefit salmon and other McKenzie River ecosystem resources. The McKenzie River Guides Association (MRGA) strongly supports the interim direction of the ROD now and as the draft supplemental EIS is being considered.

Respectfully submitted:

/S/

Tyler Holloway

President, MRGA

McKenzie River Guides Association

P.O. Box 464

Walterville, Oregon 97489

February 14, 2023

(Attachment to 12/30/25 MRGA comments on WVSO&M DEIS)

TO:

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)

SUBJECT:

McKenzie River Guides Association (MRGA) comments on

Draft Programmatic EIS-0540: Willamette Valley System

Operations and Maintenance; Oregon

WHO WE ARE:

MRGA is a not-for-profit corporation (501c4) founded in 1931 to aid in the conservation, restoration, and management of the fish life in the McKenzie River, to encourage optimal game and fish management, and to promote public participation in guided McKenzie River trips. MRGA has 145 members, 40% are active guides, the remainder are mission-supporting Associates. Each year, MRGA guides serve clients who enjoy more than 2,000 recreation service user days fishing for trout, salmon and steelhead, and floating on the McKenzie River. A reasonable estimate is that annually MRGA guides serve over 1000 angler clients contributing over a quarter million dollars to the local economy.

MRGA appreciates the opportunity to comment on the WVS-DPEIS and compliments USACE on its efforts in pursuing a challenging and important planning effort.

COMMENTS:

1. MRGA strongly supports the inclusion of the "Suite of Near-term Operations" (Table 2.2-11) in all alternatives.

We recommend that USACE work with U.S. District Judge Hernandez to develop the "suite" into a complete Alternative to be considered in a supplemental DPEIS to DPEIS-0540.

2. Deep Fall and Spring Reservoir Drawdown to the Diversion Tunnel (DT) at Cougar Dam (Final measures 2.2.3.1 and 2.2.3.3) as called for in Alternatives 2B, 3B, and 5-the Preferred-would result in pool levels of 1,330' (Tables 2.2-7, and 2.2-8), 120' lower than the "1,450 pool" established by the USACE as the minimum pool level to prevent high turbidity levels and high rates of sediment transport downstream of Cougar Dam as occurred in 2002-2004 during construction of the Cougar Dam water temperature control tower (WTCT) (USACE DEIS: Cougar Dam Downstream Passage; January 2019). Pools of 1,330' could easily conflict with the Oregon Turbidity Rule: OAR 340-041-0036 which states in part *"No more than a 10% cumulative increase in natural stream turbidities may be allowed"*, with some exceptions. High possibility or probability of violating the turbidity rule by implementing alternatives 2B, 3B, and 5 (Table 3.3-4) would call into serious question stated environmental consequences of these Alternatives in Chapter 3 (Tables 3.2-4, and 3.1.6). This would cast doubt on the overall

sufficiency of the DPEIS-0540. Chapters 6 (6.3) and 7 (Table 7.8-1) document past (4/24/20) and future (as needed regarding Clean Water Act-CWA- section 404 permitting) coordinating meetings with Oregon DEQ which are unlikely to address the turbidity matter discussed here in a timely way.

At a minimum, USACE and ODEQ should meet immediately on the matter of deep drawdowns to DT to clarify likely compliance or non-compliance with the Turbidity Rule and implications for CWA 404 permitting.

If the turbidity issue raised here is valid, then Alternatives 2B, 3B and 5 are unlikely to meet Objective 6 (page 2-6). Further, paragraph 3, page ES-35 states: "Without detailed investigation and designs, the dam safety and operational feasibility of drawing down to the diversion tunnel annually for fish passage is uncertain". With high uncertainty about Alternatives 2B, 3B, and 5 meeting turbidity standards and fish passage requirements, their usefulness in this DPEIS appears deeply suspect. That in turn would jeopardize the integrity of the entire DPEIS process.

We believe USACE should fully exhaust every feasible option for using the regulating outlet (RO) at 1,505' (1,517'? -page 2-29) for successful fish passage. If successful fish passage using the RO appears reasonable and uncertainties about drawdown to the DT remain, then Alternative 3 A should receive much deeper consideration as the basis for a Preferred Alternative.

3. Recreation is considered mostly in and around reservoirs, neglecting specifically the long-established river guiding and outfitting industry MRGA represents which operates mostly on the McKenzie, Middle Willamette, and North and South Santiam, rivers. Non-MRGA river-based recreation activities are relevant as well. These activities including raft-based summer float trips and multi-season river-boat based fishing for trout, salmon and steelhead are heavily influenced by

(mostly unannounced) fluctuating river levels resulting from USACE reservoir/dam management decisions. DPEIS alternatives all have different effects on river flow levels, hydrologic processes and river infrastructure as indicated in Table 3.1-6. Due to the programmatic level of analysis, this listing of environmental effects is generally qualitative and of limited value in determining effects on boating and river- boat guided fishing. Summary hydrographs are produced to describe the changes to the flow and surface elevation with the implementation of each of the alternatives (i.e., Figure 3.2-163 and Figure 3.2-165).

The latter figure shows, for example, that there is a 95% chance flow would be above 2,000 cubic feet/second-CFS- between July and mid-October each year and a 5% chance it would be below that level for the same period at Vida. Such information facilitates the understanding of specific variance of flow patterns among alternatives at one site. However, necessary information would be flow volumes by alternative listed as CFS and gauge height for specific monitoring sites on the Middle Willamette, McKenzie, and North and South Santiam rivers by season relevant to river guiding and outfitting and other river-based recreation.

We believe a supplemental DPEIS is necessary that fully discloses the effects (environmental consequences) of the alternatives (including but not limited to economic, and river flow data at points relevant to river recreation users) on "below-dam" river guiding and outfitting and other river-based recreation. This is based on the fact that such necessary and sufficient information is lacking in Chapter 3., and relevant material claimed by USACE to be in Appendix B, Hydrologic Processes Technical Information has not been available after several requests.

SUMMARY:

1. We recommend that USACE work with U.S. District Judge Hernandez to develop the "suite" into a complete Alternative to be considered in a supplemental DPEIS to DPEIS-0540.

2. At a minimum, USACE and ODEQ should meet immediately on the matter of deep drawdowns to DT to clarify likely compliance or non-compliance with the Turbidity Rule and implications for CWA 404 permitting.

3. We believe USACE should fully exhaust every feasible option for using the regulating outlet (RO) at 1,505' (1,517'? page 2-29) for successful fish passage. If successful passage using RO appears reasonable and uncertainties about drawdown to the DT remain, then Alternative 3A should receive much deeper consideration as the basis for the Preferred Alternative.

4. We believe a supplemental DPEIS is necessary that fully discloses the effects (environmental consequences) of the alternatives (including but not limited to economic, and river flow data at points relevant to river recreation users) on "below-dam" river guiding and outfitting and other river-based recreation.

Ethan Nickel

President

McKenzie River Guides Association

From:	Alvin M. Klausen
To:	CENWP-PME-Williamette-Valley-System-EIS
Subject:	[Non-DoD Source] Public Comment from the Marion County Board of Commissioners on Detroit Dam Supplemental Environmental Impact Statement (SEIS)
Date:	Friday, December 19, 2025 2:51:53 PM
Attachments:	image001.png Detroit SEIS USACE Public Comment - Marion County.pdf

Good afternoon,

Please accept this letter of public comment from the Marion County Board of Commissioners regarding the Supplemental Environmental Impact Statement (SEIS) on the Army Corps of Engineers operational changes at the Detroit Dam in the Willamette Valley System.

Thank you for your time, consideration, and work on this issue.

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

December 16, 2025

U.S. Army Corps of Engineers, Portland District
Attn: Liz Oliver, Project Manager
Willamette Valley System Draft Supplemental EIS
333 SW 1st Avenue
Portland, OR 97204

Re: Comments on the Willamette Valley System Operations and Maintenance – Draft Supplemental Environmental Impact Statement (SEIS)

Dear Ms. Oliver:

The Marion County Board of Commissioners writes to provide comments on the Draft Supplemental Environmental Impact Statement (SEIS) addressing proposed changes to the operations of the Willamette Valley System, including Detroit Dam. Marion County encompasses downstream communities that rely heavily on the North and South Santiam Rivers for drinking water, economic vitality, recreation, and overall public health. As such, we have serious concerns regarding the Preferred Alternative as it relates to Detroit Reservoir operations.

Downstream Drinking Water and Turbidity Concerns

Foremost among our concerns is the risk of increased turbidity and sediment transport to downstream drinking water systems that rely on the Santiam River system as their primary source of potable water. Communities including Salem, Stayton, Turner, Jefferson, and multiple rural water districts collectively serve more than 200,000 Oregonians using water drawn directly from the Santiam Rivers. These systems are not designed to withstand prolonged or repeated high-sediment events without substantial cost, operational disruption, or risk to public health.

The SEIS characterizes anticipated turbidity impacts as "moderate," yet recent experience in the Willamette Basin calls that conclusion into question. The Green Peter and Foster Reservoir drawdown experiment, conducted for similar fish passage objectives, resulted in extreme turbidity levels downstream and tens of millions of dollars in documented damage to municipal drinking water infrastructure. Critically, the SEIS does not adequately incorporate this real-world data into its analysis, nor does it demonstrate how conditions at Detroit would materially differ in a way that meaningfully reduces risk.

Without clear, quantitative sediment modeling, turbidity projections, treatment-threshold analysis, and contingency planning, the SEIS does not provide sufficient assurance that downstream drinking water systems can operate reliably under the proposed drawdown regime. The Board is particularly concerned that proceeding without these analyses places local governments and ratepayers at risk of bearing the financial and public health consequences of a federal operational decision.

Scientific Uncertainty and Effectiveness of the Proposed Action

The Board is also concerned that the SEIS does not demonstrate, with site-specific scientific evidence, that the proposed deep drawdown at Detroit Dam will achieve its intended biological outcomes. While improving passage for ESA-listed salmonids is an important goal, the SEIS relies heavily on assumptions rather than empirical results. Notably, the Green Peter/Foster drawdown experiment has not yet demonstrated measurable improvements in salmon returns, and adult fish response will not be known for several years.

Given this uncertainty, it is premature to expand or replicate a drawdown strategy that has already produced severe and documented downstream impacts elsewhere in the basin. The SEIS does not answer the fundamental question facing affected communities: does this approach actually work, and does the anticipated benefits outweigh the demonstrated risks? Absent clear evidence of effectiveness, Marion County believes it is inappropriate to impose further risk on downstream water users and communities.

Cumulative Impacts of Federal Actions

Communities in the North Santiam Canyon and downstream Marion County have repeatedly absorbed the impacts of federal decisions related to land management, forest policy, dam operations, and emergency response. These cumulative impacts matter. Local governments and residents have consistently been asked to adapt to operational changes over which they have little control, while shouldering long-term economic and infrastructure consequences.

This proposed operational change must be evaluated within that broader context. The SEIS, as drafted, does not sufficiently account for the cumulative burden placed on these communities by successive federal actions, particularly when risks are localized while benefits remain uncertain or long-term.

Ongoing Recovery from the 2020 Wildfires

Finally, the Board emphasizes that communities in and around the Santiam Canyon are still actively recovering from the devastating 2020 Labor Day wildfires, which caused catastrophic loss of homes, businesses, infrastructure, and community stability in Detroit, Idanha, Gates, Lyons, and surrounding areas. Recovery has been slow and uneven, and recreation-based economic activity tied to Detroit Lake and the Santiam River system remains a critical pillar of that recovery. Actions that further disrupt reservoir levels, water quality, or recreation access risk undermining this fragile progress, yet the SEIS does not sufficiently analyze or acknowledge how the proposed drawdown could compound ongoing wildfire-related economic and social impacts.

Marion County's Request

The Marion County Board of Commissioners remains committed to protecting Oregon's natural resources and ensuring the long-term health and resilience of our environment. However, we cannot support proceeding with a deep drawdown at Detroit Dam without clearer scientific justification, comprehensive incorporation of lessons learned from the Green Peter/Foster experiment, and robust analysis of downstream drinking water risks and community impacts.

We respectfully request that the U.S. Army Corps of Engineers pause further implementation of this proposed operational change until:

- The results of prior drawdown experiments are fully evaluated and publicly documented;
- Site-specific sediment and turbidity modeling is completed for Detroit Reservoir;
- Downstream drinking water providers are fully engaged and protected; and
- The cumulative and post-wildfire impacts to Santiam Canyon communities are meaningfully addressed.

Marion County stands ready to work collaboratively with the Corps to identify solutions that balance fish recovery goals with public health, water reliability, and community resilience.

Thank you for your consideration of our comments.

Sincerely,

Danielle Bethell
Chair

Colm Willis
Commissioner

Kevin Cameron
Commissioner

From:	Debbie Woodall
To:	CENWP-PME-Williamette-Valley-System-EIS
Subject:	[Non-DoD Source] Comment on Drawdown of Detroit Lake
Date:	Tuesday, December 16, 2025 11:53:50 AM
Attachments:	Comment Letter-Detroit Lake.pdf

Please don’t do the drawdown, it would have drastic consequences.

Thank you & Have a great day!

Debbie Dixon

Subject: Comments on Detroit Reservoir SEIS – Need for Data and Alternatives

To the U.S. Army Corps of Engineers:

Thank you for the opportunity to comment. I am submitting these comments as a member/supporter of Kokanee Power of Oregon and as someone who cares about the health of Detroit Reservoir, its fisheries, and the communities that depend on it.

1. Please release the scientific results from the Green Peter drawdown before taking similar actions at Detroit.
The public has not been shown whether salmon survival improved or whether the significant fish kills, barotrauma injuries, and siltation impacts observed at Green Peter were avoided or mitigated. We cannot evaluate Detroit without this information.

2. Please extend the public comment period.
Municipalities, water providers, anglers, and recreation groups need more time to understand the proposal, especially since crucial Green Peter data has not been released.

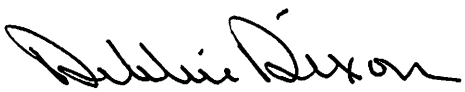
3. Please fully evaluate alternatives to a major drawdown.
Please ensure the Corps has fully evaluated alternatives to a major drawdown, including seasonal smolt-collection weirs that are widely used elsewhere and could allow safe fish transport without the severe ecological harm associated with large pool reductions.

4. Please protect ongoing scientific research at Detroit Reservoir.
Detroit hosts a multi-year scientific study on anti-microbial treatments and juvenile-fish survival. A drastic drawdown could interrupt or destroy several years of data collection, undermining research that directly benefits salmon recovery statewide.

5. Please ensure that Detroit's kokanee fishery, recreation economy, and local water systems are fully analyzed.
The Green Peter drawdown caused severe impacts to fish populations and downstream habitat, according to biologists and residents. Detroit's much larger recreational and economic footprint requires a comprehensive evaluation.

Thank you for considering these comments. I am not opposed to salmon recovery—I support it. I simply want to see transparent science and balanced management before irreversible decisions are made.

Sincerely,



From: Karen Vigeland
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Do Not Drawdown Detroit Lake
Date: Sunday, December 14, 2025 3:45:09 PM
Attachments: US Corps of Engineers.docx

Karen Vigeland
vigelandkm@aol.com
360-901-0115

US Corps of Engineers
PO Box 2946
Portland, OR 97208-2946

December 10, 2025

URGENT: Do Not Draw Down Detroit Lake!
Public Comment submission

To Whom it May Concern,

We (George and Karen Vigeland) feel that it is urgent to express our absolute horror regarding the potential drawdown of Detroit Lake. There are innumerable disasters that would result from this plan. It is a threat to water quality, the environment, public safety and economic recovery.

I realize that the determination of this order for the drawdown was made far from Detroit and long before the devastating fires of 2020. The decision needs to be revised--in current time!

Our Concerns:
1. Water Purity. Salem depends on Detroit for its water supply. A drawdown will create muddy waters which will overwhelm existing purification systems. LIVES ARE AT STAKE!

2. Our family has owned property on the banks of the reservoir for over 55 years. The lake has always been full from spring to mid-September- until recent years. Management of the reservoir needs to be revised due to the many changes over the years. There are many more demands on the water from the reservoir. Environmental changes due to the wildfires have caused earlier runoff due to decreased snowpack shade. These earlier runoffs are not being captured! The current 'fill curve' is out of date and needs revision.

3. Wildfires have increased all across the Western US. We have seen Detroit Lake used as a source for water as planes scoop in and retrieve the water. KEEP IT FULL! Detroit Lake is a defense against future fires, which are predicted to continue.

4. We have seen firsthand the devastation of the economy in the Detroit area. The entire Santiam Canyon is struggling to rebuild after the Labor Day 2020 fires. A drawdown at this point will strike a FINAL BLOW to the fragile economy of the entire Canyon.

5. We have seen the results from previous drawdowns where thousands of dead Kokanee and other fish are on dry land. Please do not do that to Detroit!

6. We are also concerned to know if the goals of this drawdown are warranted. What are the statistics of the salmon run before the Detroit Dam? The other considerations for human health and survival should outweigh the concerns for salmon.

Sincerely,
Karen M Vigeland, MD (vigelandkm@aol.com)
George N Vigeland, Jr MD (geovig@comcst.net)
490 Small Lane
Detroit, OR 97342

Note: We fled for our lives on Labor Day 2020 when wildfires descended on Detroit. We had no warning. We were fortunate our neighbor called to say 'Get Out Now!'. We lost our home. We believe in Detroit, so we have rebuilt. We hope we don't lose it again due to outdated edicts.

From: Jim Wheaton
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] Detroit Reservoir drawdown
Date: Friday, December 12, 2025 8:59:06 AM
Attachments: Public-Comment-Letter_copy.pdf

Subject: Comments on Detroit Reservoir SEIS – Need for Data and Alternatives

To the U.S. Army Corps of Engineers:

Thank you for the opportunity to comment. I am submitting these comments as a member/supporter of Kokanee Power of Oregon and as someone who cares about the health of Detroit Reservoir, its fisheries, and the communities that depend on it.

1. Please release the scientific results from the Green Peter drawdown before taking similar actions at Detroit.
The public has not been shown whether salmon survival improved or whether the significant fish kills, barotrauma injuries, and siltation impacts observed at Green Peter were avoided or mitigated. We cannot evaluate Detroit without this information.

2. Please extend the public comment period.
Municipalities, water providers, anglers, and recreation groups need more time to understand the proposal, especially since crucial Green Peter data has not been released.

3. Please fully evaluate alternatives to a major drawdown.
Please ensure the Corps has fully evaluated alternatives to a major drawdown, including seasonal smolt-collection weirs that are widely used elsewhere and could allow safe fish transport without the severe ecological harm associated with large pool reductions.

4. Please protect ongoing scientific research at Detroit Reservoir.
Detroit hosts a multi-year scientific study on anti-microbial treatments and juvenile-fish survival. A drastic drawdown could interrupt or destroy several years of data collection, undermining research that directly benefits salmon recovery statewide.

5. Please ensure that Detroit's kokanee fishery, recreation economy, and local water systems are fully analyzed.
The Green Peter drawdown caused severe impacts to fish populations and downstream habitat, according to biologists and residents. Detroit's much larger recreational and economic footprint requires a comprehensive evaluation.

Thank you for considering these comments. I am not opposed to salmon recovery—I support it. I simply want to see transparent science and balanced management before irreversible decisions are made.

Sincerely,

From: Michelle Connor
To: CENWP-PME-Williamette-Valley-System-EIS
Subject: [Non-DoD Source] URGENT: Do Not Draw Down Detroit Lake - Public Comment Submission
Date: Thursday, December 11, 2025 2:52:21 PM
Attachments: Draw Down Letter.pdf

Please see attached!

--
Best Regards,

Michelle Connor
503-979-2277

December 6, 2025

Subject Line: URGENT: Do Not Draw Down Detroit Lake — Public Comment Submission

To Whom It May Concern,

I am writing with urgency and deep concern regarding the U.S. Army Corps of Engineers' proposed deep drawdown of Detroit Lake.

This proposal poses a direct and immediate threat to our region's water quality, environmental stability, public safety, and economic recovery. The impacts of such a drawdown are not theoretical — they are inevitable, severe, and cannot be reversed once set in motion.

Here's what is at stake:

1. **Water Security for Thousands**
   Turbid, unstable water flows will overwhelm treatment plants in the Santiam Canyon and the Willamette Valley, including the City of Salem's drinking water intake. A drawdown during critical recharge months puts entire communities at risk of water shortages and utility disruptions.

2. **Climate Conditions Have Changed — So Must Our Strategy**
   Detroit Lake is no longer filling like it once did. Wildfires have stripped away snowpack shade, leading to earlier, faster runoff that is not being captured. The current fill curve is dangerously outdated and ignores the reality of prolonged drought and reduced spring rainfall.

3. **Increased Wildfire Danger**
   With hotter, drier summers and reduced snowpack, wildfire threats are escalating. A full reservoir is a frontline defense, providing essential firefighting water resources. A drawdown removes this safety net.

4. **Economic Devastation**
   Canyon communities like Detroit, Idanha, Gates, and Mill City are still rebuilding from the 2020 wildfires. Local businesses rely on a full lake to survive the summer season. Drawing down the lake will deal a crushing economic blow to already fragile local economies.

5. **Collapse of Local Fish Species**
   The proposed drawdown doesn't just impact salmon — it puts kokanee and other species at risk of total collapse. We've already seen this happen at Green Peter. We cannot allow Detroit Lake to become the next casualty.

This isn't just a Detroit Lake issue. All of Western Oregon is at risk. Our water infrastructure depends on smart, stable, climate-aware reservoir management. A move this drastic sets a dangerous precedent for the entire state.

I strongly urge the U.S. Army Corps of Engineers to halt this proposed drawdown immediately and prioritize solutions that reflect the realities of today's climate, wildfire risks, and community needs. Additionally, I support the request for a 45-day extension to the public comment period to ensure full community engagement.

This is a defining moment for the future of water management in Oregon. We need your leadership and responsiveness now more than ever.

Sincerely,

Michelle Connor
Detroit, OR

I lost my home and my business in the 2020 wildfires. The drawdown of Detroit Lake would only increase our chances of another fire and severely hinder our economic growth. The downtown business district in Detroit, OR was totally devastated and 5 years later is still struggling to return. This drawdown would be another devastating blow to our community.

From:	Alvin M. Klausen
To:	usarmy.pentagon.hqda-oce.mbx.operations@army.mil; usarmy.pentagon.hqda-oce.mbx.xo@army.mil; usarmy.pentagon.hqda-oce.mesg.daen-zc@army.mil
Cc:	CENWP-PME-Williamette-Valley-System-EIS; Henon, Jeffrey M CIV USARMY CENWP (USA); Caswell, Larry Dale (Dale) JR COL USARMY CENWP (USA)
Subject:	[Non-DoD Source] Detroit Dam SEIS Public Comment Extension Request
Date:	Friday, December 5, 2025 10:50:23 AM
Attachments:	image003.png Detroit SEIS Public Comment Extension Request - Marion County, Oregon.pdf

Dear Lieutenant General Graham,

My name is Alvin Klausen, and I serve as the Government Relations Manager for Marion County, Oregon. I am writing on behalf of the Marion County Board of Commissioners to share the attached letter regarding the U.S. Army Corps of Engineers' Supplemental Environmental Impact Statement (SEIS) for operations of the Detroit Dam within the Willamette Valley System.

In the attached correspondence, the Board respectfully requests a 45-day extension of the current public comment period. Given the complexity of the SEIS, the significant potential impacts of proposed operational changes on communities across Marion County, and the fact that the existing comment window falls largely during the holiday season, our Board believes additional time is essential to allow meaningful public, local government, and stakeholder review.

We appreciate your consideration of this request and your ongoing work with Oregon communities on these important issues. Please feel free to contact me if you have any questions or would like to discuss our request further.

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

December 2, 2025

Lieutenant General William H. Graham, Jr.
Chief of Engineers
U.S. Army Corps of Engineers
441 G Street NW
Washington, D.C. 20314

RE: Request to Extend Public Comment Period on Detroit Dam Supplemental Environmental Impact Statement (SEIS)

Dear Lieutenant General Graham:

The Marion County Board of Commissioners writes to request an extension of the public comment period for the U.S. Army Corps of Engineers' Supplemental Environmental Impact Statement (SEIS) regarding operations of the Detroit Dam within Oregon's Willamette Valley System. The draft SEIS was released on November 14, with the current comment period set to close on December 29.

Given the scope, complexity, and potential impacts of the proposed operational changes, we request an additional 45-day extension to ensure that local governments, public agencies, Tribal partners, utility providers, business owners, and the general public have adequate time to meaningfully review and comment on this document.

The draft SEIS outlines operational alternatives that could result in extraordinary impacts across Marion County and the broader Santiam Canyon. Prior deep drawdowns at other Willamette Basin reservoirs have already demonstrated the seriousness of these risks, including severe turbidity events, substantial disruptions to drinking water systems, and economic losses for surrounding communities. Detroit Reservoir directly supports drinking water supplies for more than 200,000 downstream residents, sustains recreation and tourism-based economies, and supports critical fisheries and habitat. Any operational changes that affect water quality, availability, or timing of releases will have profound consequences.

While a 45-day public comment period is already a limited window for a document of this length and technical sophistication, this particular review period overlaps almost entirely with the Thanksgiving, Christmas, and Hanukkah holidays, among others. This is one of the most challenging times of the year for both public entities and private citizens to engage in detailed regulatory review. Reduced staffing levels, end-of-year responsibilities, holiday travel, and competing obligations make it significantly more difficult for our community to provide informed and thoughtful feedback.

For a SEIS with implications of this magnitude, touching drinking water safety, environmental stewardship, public health, infrastructure operations, and the economic resilience of rural communities, it is essential that Oregonians have a meaningful opportunity to participate. Extending the comment period is in the public interest and will help ensure that the Corps receives the full breadth of input necessary to support a well-informed and transparent decision-making process.

Accordingly, we respectfully request that the U.S. Army Corps of Engineers extend the SEIS public comment period by an additional 45 days.

Thank you for your attention to this matter and for your continued collaboration with Oregon communities. We look forward to working together to ensure that the management of the Willamette Valley System protects endangered species while also safeguarding the needs, safety, and well-being of the people of Marion County and the broader region.

Sincerely,

Danielle Bethell	Colm Willis	Kevin Cameron
Chair	Commissioner	Commissioner

From: Dave White
To: "Robert Powell"
Subject: [Non-DoD Source] rule 44 rehearing
Date: Wednesday, November 26, 2025 10:56:38 AM
Attachments: REHEARING_BY_RULE_44.pdf
Importance: High

However on 11/14/2025 and 11/21/2025 the US Supreme Court denied all writs except one for President Trump by Kristy Noem. These two dates the Supreme Court had a little over 100 dockets to adjudicate. Confirming with the head clerk, the Supreme Court denied all because the sheer number was too great to adequately adjudicate them. They are therefore waiting to see which docket's have Rule 44 rehearing's filed in them.

No legal or scientific reason to remove any dam. Fish ladders work. The sea lions are the almost 1:1 ratio to the decline of the salmon in the Columbia river. Our salmon protection device attached to the down stream fish ladders will fix declining salmon runs within seven years, salmonprotectiondevice.com 503-608-7611 x602
Reality is that which when taken away still exists.

No.25-5725

IN THE SUPREME COURT OF THE UNITED STATES

DAVID C. WHITE Petitioner

V.

Respondents

Federal Energy Regulatory Commission (FERC)
Chairman Willie L. Phillips, R1
Commissioner Mark Christie R2.
Commissioner David Rosner R3
Commissioner Lindsay S. See R4
Commissioner Judy W. Chang R5

On Petition for an Extraordinary Writ of Prohibition, Mandamus by Rule 20 to the United States Federal, Court the Ninth Circuit Docket 24-5811

Extraordinary Writ of Prohibition, Mandamus by Rule 20.

D. John Sauer
Counsel of Record
Solicitor General
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
SUPREMECTBRIEFS@USDOJ.GOV
Ph: 202-514-2217

SUMMARY

Rehearing is requested, with all due respect, because failure to grant this Writ constitutes violation of the Clean Water Act by 33 U.S.C. §1251, 22–451 June 28th, 2024 Federal Case number 22–451 in Loper Bright and many other Constitutional provisions. Worst of all, failure to approve this Writ perpetuates a deadly threat for human and animal life in the Klamath River Basin. FERC incompetence has unleashed an environmental catastrophe far worse than the Exxon-Valdez oil spill of the last century. FERC is accessory after the fact by 18 USC 3 for KRRC killing 2000 fish and a herd of Elk. This is also a violation of 16 USCA § 1532 endangered species act. Also a violation of 18 U.S. Code § 41 having no license to kill wildlife.

The lower courts judges deserve disqualification by 28 U.S. Code § 455. Only the U.S.

Supreme Court can correct this tragedy by granting this Writ.

As this Writ ably demonstrates, lower court judges who dismiss a case when the Defense abandons its argument by default are guilty of Misprision of Felony by 18 U.S.C. 4. They have been informed of an alleged crime but then fail to investigate or adjudicate it by ignoring due process of law.

How can the U.S. Supreme Court discipline notorious, longstanding

offenses in the 9th

Circuit Court of Appeals if it, in effect, is culpable of the same failures.

The Federal Energy Regulatory Commission (FERC) (Respondent) capitulated, and thus confessed to the alleged crimes, not only because their legal counsel filed Waiver of Right of Respondent (FERC) to respond on Nov 03 2025, but because they know FERC is guilty of providing a license to remove dams by illegal cherry picking data.

They listened exclusively to unscientific, emotional appeals of upstream tribes and completely ignored all other testimony adamantly opposed to dam removal. These reasonable alternatives could have satisfied everybody's needs, including the tribes. Because of this, two FERC commissioners were removed. As in U.S Supreme Court docket 25-5660, Petitioner strongly urges the Court not to accept any opinion or ruling from the 9th circuit courts, which are convened under illegal administrative law by 22–451 June 28th, 2024 Federal Case number 22–451 in Loper Bright. Six dockets and six illegal opinions they were frivolous when the dockets were not. However, Petitioner would not have filed complaints if the complaints were unfounded.

https://thelawisyourattorney.com/loper-bright-enterprises/

Was the Rule of 4 used to dismiss this WRIT?

https://legalknowledgebase.com/why-would-the-supreme-court-reject-a-writ-of-certiorari

Under Rule 55 there are only four legitimate reasons for denying a Writ: Reasons for denying a writ.

1. Writ formatted wrong.
2. Writ doesn't prove the case.
3. Writ contains erroneous factual findings or the misapplication of a properly stated rule of law.
4. The petitioner contends not that the lower court interpreted the law incorrectly, but that the court simply applied the law wrongly to the facts of that case.

None of 1-4 are applicable. The Writ is formatted correctly with many legal

questions, which are referenced in the statement of the case. The Writ

presents factual findings of federal laws violated by Respondent's

licensees. The lower court is biased against Pro Se.

Three factors must be present before the U.S. Supreme Court will review a state court decision:

- A substantial federal question must be present. Must be a real question.
- The federal question must be crucial to the decision.
- The losing party must have exhausted all state remedies.

These three factors are abundantly made clear and factual in this writ.

It is abundantly clear that the Writ meets all of the criteria for acceptance.

Respondents were in default, and they abandoned their case by

confession of guilt. Thus, there can be no legally defensible reason for

denying this Writ.

Petitioner's Prayer to evaluate and approve all dam removals might at first

glance appear presumptuous. However, as evidence in this appeal substantiates, his lifetime of experience as a Chemical Engineer makes him far more qualified than the “expert” fish Biologists whose incompetence has destroyed the environmental ecosystem in the Klamath River basin.

Reinforcing the FRCP 55 default in Docket 25-5725, FERC formally capitulated and two FERC commissioners were removed.

How can the Court simply ignore this confession and associated FRCP 55 requirements?

How is justice served by such a dismissal, which results in Misprision of Felony by 18 U.S.C. 4, when the alleged crimes are confessed, but then ignored with no due process of law?

Cherry picking data to support a false narrative for Klamath Dam removal is wrong scientifically, wrong by FERCs own rules, and illegal because the Chevron doctrine since 2005 was made null and void by 22–451 June 28th, 2024 Federal Case number 22–451 in Loper Bright with Justice Neil M. Gorsuch’s supporting opinion which explained in detail how administrative law crept into the judiciary, making the Chevron Doctrine null and void. https://thelawisyourattorney.com/loper-bright-enterprises/.

And yet, all of the justices in the 9th Circuit have persisted in flaunting 22–451 June 28th, 2024 Federal Case number 22–451 in Loper Bright since its enactment on June 28, 2024, refusing to convene as Article III Courts. By refusing this Writ the Court grants tacit approval for the egregious contumacy of the 9th Circuit Court of Appeals to continue unabated.

OUR STORY:

salmonprotectiondevice.com

Virtually all dam-related issues may be resolved without dam removal, **as** the research of the late Steve Cramer so powerfully demonstrates. Steve Cramer worked on salmon research at Cramer Fish Sciences in Portland since the early 1980's. Through the years Steve and Petitioner had talked about the idea of a Salmon Protection Device (SPD) to prevent sea lions from attacking the salmon as they enter the fish ladders at the

Bonneville Dam. The SPD is a big cage made of 1-inch stainless steel rods attached to the foot of a fish ladder . Unfortunately, Steve passed away of cancer in the Spring of 2023. In January, that year I talked with Steve and he said he wasn't going to live much longer and he asked me to make the SPD a reality. Petitioner told him Petitioner would do everything he could, but resources were limited.

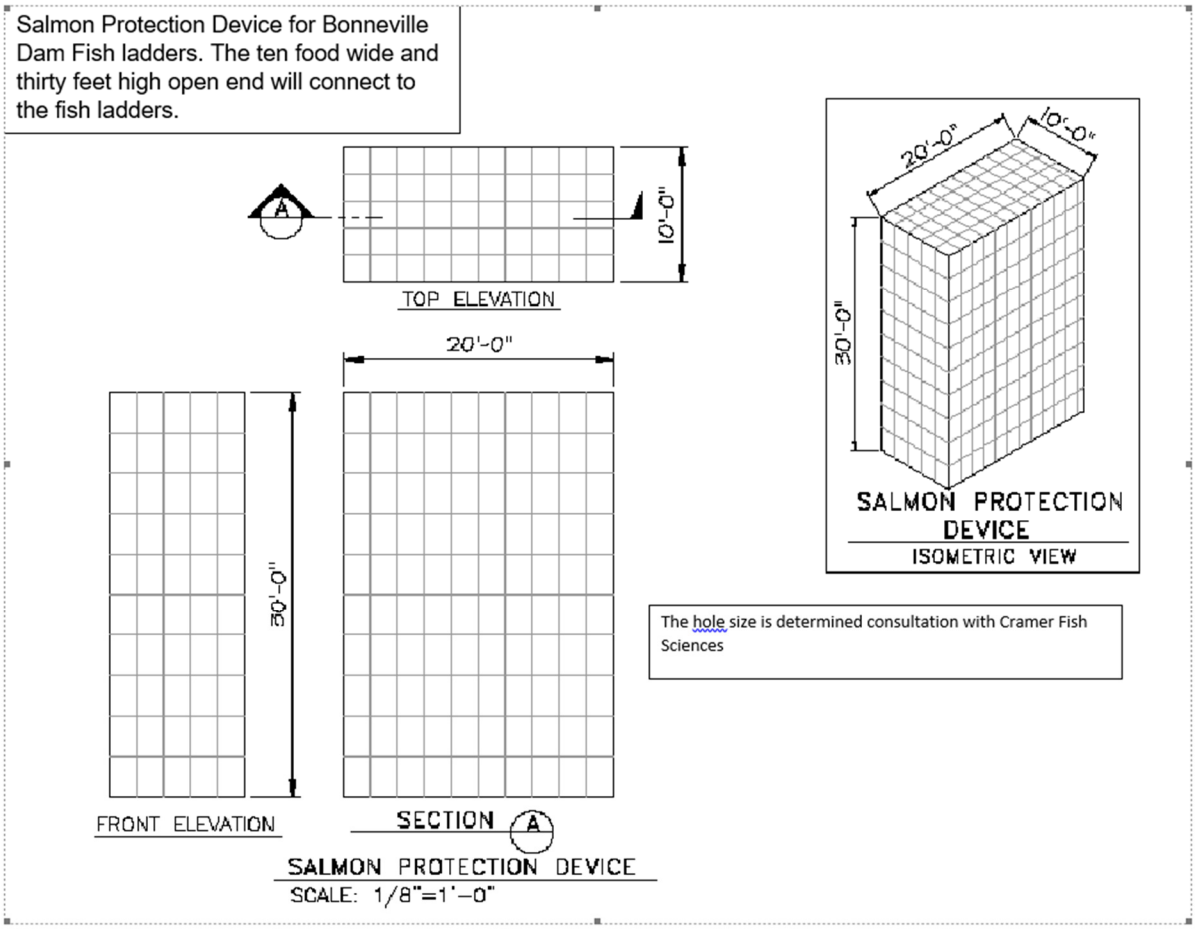
Then in December 2023 Petitioner saw ODFW funding available for such projects and with Steve in mind went ahead and applied. The application process asked how this idea will be promoted. I post it on X-Twitter every day and have 3000 followers who repost it. Also, on the Next-Door App. In

the process I contacted the Army Corp of Engineers. They liked the idea and rushed the Section 408 and Joint application. This application normally takes a year, but they finished in one month. We also received the latest fish ladder drawings from the Corp.

Petitioner Salmon fished on Sauvé Island many times between January and March each year. Our group of about 25 would walk back a few miles to our favorite spot. Salmon are much faster than Sea Lions and can \ normally out run them, but not on the end of a fish line. Almost every other catch a sea lion would take the Salmon off our line and eat it. We ended up with a salmon head and that's all.

As part of the follow-up protocol, we're asking for a three-year moratorium

on Salmon Fishing below the Bonneville Dam on both banks. This, along with the SPD will remove easy access to food for the Sea Lions in the river.



This should be adequate time to train the Sea Lions to return to the ocean

where they belong and give the Salmon population time to recover, free from sea lions and fishermen.

As noted in the table below, the increase in Sea Lions correlates almost one-to-one with the declining fish counts at Bonneville dam. It's a well-known fact that the Sea Lions wait at the fish ladders on the downstream side of the Dam for Salmon going upstream to enter the ladder. One Sea Lion eats its fill and another Sea Lion takes its place in a round robin style.

See Figures one and two for proof that the major issue with the decline in salmon population on the Columbia is the Sea Lions, not the dams. The two lines are almost parallel, indicating correlation of the two Variables.

https://www.columbian.com/news/2015/oct/21/sea-lions-now-a-year-round-issue-in-columbia/

The problem is a bit different on the Green Peter Dam in Western Oregon, where water turbidity has been killing the fish. A judge ordered draining the reservoir on the assumption that that would allow it to refill with clean water from upstream. However, that made turbidity much worse as dirt sloughed off the newly exposed banks and the water level went down. This was \ done on the advice of a radical environmental group that stands to profit from removal of the dam after the fish are “protected.” Their idea of

“protection” has killed orders-of-magnitude more fish than would get the rest of us thrown in jail probably for life.

They made no effort to consult with Dam operators or local residents before making their extreme draw-down, and dam removal proposal. When I visited the dam with my sister to take some pictures, I spoke with the Dam operator. He said that he emphatically did not agree with the judge’s ruling and that the protocol had resulted in far more fish being killed by additional turbidity. He recommended dredging behind the dam to save both the dam and the fish. This will get the fish ladder working again. That fish ladder has not been operational since the late 1980’s because of silt buildup behind the dam.

On the way home, I spoke with a member of the university team who had prepared the scientific assessment for the court. After a brief discussion with myself and my sister he agreed that dredging behind the dam would be the best solution.

[This article was edited by Oliver Woods, Head-of-School at www.hymarkacademy.us, an online classical school for grades 7-12. Keys to the Classics: A History of the Decline and Fall of Western Civilization]

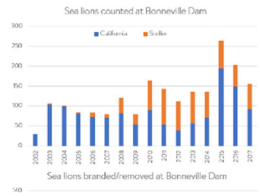


Figure 1. Sea Lion Increase in Columbia River

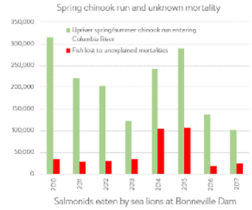


Figure two salmon counts decrease almost mirrors the Sea Lion Increase, making it a direct correlation.

Our grant for putting our salmon protection device on the fish ladders at Bonneville Dam has finished scientific peer review with NOAA Fisheries and funding is scheduled for January 1, 2026.

DOC OIG Hotline Form

Department of Commerce, Office of Inspector General, Fraud, Waste & Abuse Hotline

Thank you.
Your information has been submitted to the DOC OIG.

The OIG will evaluate your complaint and determine an appropriate course of action. Options include opening an OIG review (audit, evaluation, or investigation); referring the matter to a DOC Operating Unit for review and corrective action, if warranted; referring the matter to another Federal agency; or taking no action (allegations that do not involve a potential violation of law, rule, regulation, or policy as well as allegations with limited specificity or merit may be closed with no further action). Due to privacy interests, we do not provide complainants with updates on, or the results of, complaints and/or investigative matters.

If you did not provide contact information and you wish to provide additional information about this complaint matter, please call (800) 424-5197 and provide your tracking number.

Your submission tracking number is: **24184**

https://www.opb.org/article/2023/08/05/columbia-river-salmon-habitat-spending-study/

Or https://salmonproectiondevice.com/Billions_spent_on%20hatcheries.pdf

The article says “Prior to damming, an estimated 16 million salmon and steelhead returned to the Columbia River in the area above what is now Bonneville Dam each year. But by the 1970s, less than 1 million were returning.” . This is true because the Columbia river dams didn’t have fish ladders. Starting around 1970 fish ladders were installed in the Columbia

river dams and the runs returned in a few short years, In the late 1980's

Sea Lions found an easy meal at the fish ladders and fisher men's fishing

line. In 2002 2.5 million returning in spring runs. This spring less than

300,000.

Or this link Complaint filed against NOAA Fisheries waste of $1 billion as a

whistle blower.

Salmonprotectiondevice.com will fix the declining salmon and sturgeon

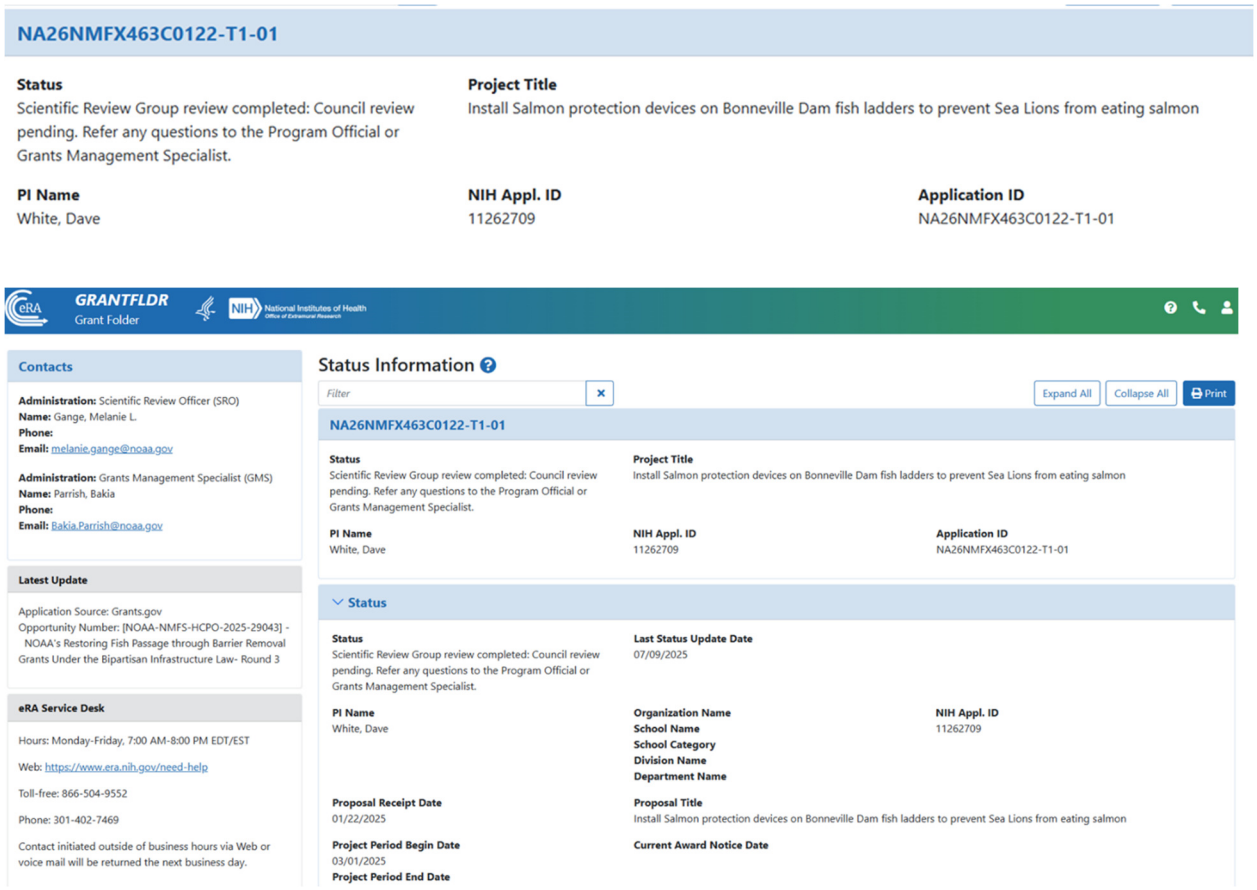
runs in the Columbia river within a few years. The Sea Lions have always

been the issue for the declining runs.

https://thelawisyourattorney.com/judicial-bias-against-litigants-in-dam-removal-cases/

They said council review not need and we will get the funding just after

January 1st, 2026



NA26NMFX463C0122-T1-01

Status
Scientific Review Group review completed: Council review pending. Refer any questions to the Program Official or Grants Management Specialist.

Project Title
Install Salmon protection devices on Bonneville Dam fish ladders to prevent Sea Lions from eating salmon

PI Name
White, Dave

NIH Appl. ID
11262709

Application ID
NA26NMFX463C0122-T1-01

GRANTFLDR
Grant Folder

National Institutes of Health

Contacts

Administration: Scientific Review Officer (SRO)
Name: Gange, Melanie L.
Phone:
Email: melanie.gange@noaa.gov

Administration: Grants Management Specialist (GMS)
Name: Parrish, Bakia
Phone:
Email: Bakia.Parrish@noaa.gov

Latest Update

Application Source: Grants.gov
Opportunity Number: [NOAA-NMFS-HCPO-2025-29043] - NOAA's Restoring Fish Passage through Barrier Removal Grants Under the Bipartisan Infrastructure Law- Round 3

eRA Service Desk

Hours: Monday-Friday, 7:00 AM-8:00 PM EDT/EST

Web: https://www.era.nih.gov/need-help

Toll-free: 866-504-9552

Phone: 301-402-7469

Contact initiated outside of business hours via Web or voice mail will be returned the next business day.

Status Information

Filter

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Last Status Update Date
07/09/2025

PI Name
White, Dave

Organization Name
School Name
School Category
Division Name
Department Name

NIH Appl. ID
11262709

Proposal Receipt Date
01/22/2025

Proposal Title
Install Salmon protection devices on Bonneville Dam fish ladders to prevent Sea Lions from eating salmon

Project Period Begin Date
03/01/2025

Project Period End Date

Current Award Notice Date

The issue with the salmon in the Columbia river is not the dams. It's the sea lions.

We can help you write an injunction against what this judge did based on junk science. As long as a dam has a fish ladder then the fish are trained to go there. However, on the Columbia River, the Sea Lions wait at the fish ladder entrance downstream of the lower dam.

https://salmonprotectiondevice.com/

My number is 503-608-7611 x602

In short, the 2008 and 2024 Biological Opinions are junk science and

illegal cherry picking evidence and testimony. Petitioner requests these Biological Opinions be made null and void by the U.S. Supreme Court. This is explained in the Writ filed in this docket. Based on everything we've seen so far, the data proves Petitioner, a life-long Chemical Engineer, knows more about fish science than most fish biologists.

Failure to approve this Writ perpetuates a deadly threat for human and animal life in the Klamath River Basin. Below is a warning sign we intend to post on both sides of the river if this Writ is granted.

DO NOT COME NEAR THE RIVER WITHOUT WEARING A GAS MASK.
THE SILT IS HEAVY LADEN WITH ARSENIC AND CHROMIUM 6 POISONS.

https://salmonprottectiondevive.com/CDM_2011_0119_ScreeningLevel-Evaluation-of-Contaminants-in-Sediments.pdf

Chapter three tables in the Department of Interior Report identify arsenic and chromium 6 up to 40 times recommended levels in the silt.
DON'T EAT THE FISH

Las tablas del capítulo tres describen el arsénico y el cromo 6 en el limo.

NO SE ACERQUE AL RÍO SIN MÁSCARA DE GAS.

EL LODO ESTÁ CARGADO DE ARSNICO Y CROMO VI.
NO COMAS EL PESCADO

Salmonprotectiondevice.com see Klamath page
503-608-7611 x602

GROUNDS

In this Petition for Rehearing by Rule 44, Petitioner states the grounds briefly and distinctly. Petitioner begs the U.S. Supreme Court for Rehearing on the merits of 25-5725. This petition is presented in good faith in the U.S. Supreme Court and not for delay. Respondents are *prima facie* in default based on the timeline established by Rule 55 when they were duly served the Writ. Respondent Legal Counsel filed to capitulate on November 3rd by their legal counsel; Solicitor General D. John Sauer filed Waiver of Right of Respondent FERC to Respond.

The legal irregularity of this dismissal is why this Petition for Rehearing by Rule 44 is filed in this docket.

With all due respect, the Court has failed to follow Federal rules regarding the strength and legal weight of a default judgment and the conditions for overturning it. The Supreme Court is bound to these rules by Article VI of the U.S. Constitution, which requires that "This Constitution, and the Laws of the United States which shall be made in Pursuance thereof; shall be

The supreme Law of the Land; and all executive and judicial Officers, both of the United States and of the several States, shall be bound by Oath or Affirmation, to support this Constitution;" Surely, failure of the judiciary To uphold these federal laws "made in pursuance thereof" is a lapse of "good behavior" required by Article III.

Strength and Legal Weight of Default Judgment

According to Rule 55 – made in pursuance to the U.S. Constitution -- a default judgment is a final, legally binding decision. It resolves all questions of liability presented in the initial complaint.

The winning party (Petitioner) can take action to collect on the judgment, which may include, for example, wage garnishment, bank account levies,

or property liens. Plaintiff has presented an overwhelming *quantum* of admissible evidence that justifies the relief requested, in the Writ filed based on the merits, as demonstrated below.

Conditions for Overturning Default Judgment

Moreover, the conditions for overturning a default judgment by Rule 55 have not been met. Dismissal requires the defaulting party to actively file a motion to set it aside. (FRCP 60) No such motion has been filed by the defaulting party. They have abandoned their argument by failure to appear, and the Court therefore, with all due respect, has no authority to dismiss under the Constitution.

It is this very practice of arbitrary and subjective, judicial discretion –

resulting in Misprision of Felony by 18 U.S.C. 4 -- that has frustrated U.S.

Citizens in the 9th Circuit Court of Appeals for decades. How can the Court

discipline renegade judges in the 9th Circuit if it is culpable of the very same

trespass?

Such a motion to overturn a default judgment requires the defaulting party

to demonstrate Good Cause or some reasonable excuse for failing to file

a timely answer or appear in court, such as improper service of process, a

medical emergency, fraud, or a legitimate mistake.

In addition, the defaulting party must show a valid, justifiable reason or

Meritorious Defense for their claims. This means that the outcome of the

case might be different if they were allowed to present their side, as

demonstrated by an affidavit or sworn statement outlining the facts of their

defense. But again, no such affidavit was provided in a prompt or timely

manner.

The Relief Sought

Petitioner prays for the U.S. Supreme court to rehear this case by Rule

44 and confirm that Respondents, violated the internal FERC documents

against cherry picking data, ignoring County wide votes in Klamath and

Yreka County's where about 80% of people didn't want the dams removed, 2017 California Water board testimony and 2009-2002 Interior Department sanctioned chemistry test. This test, chapters 2 and 3, prove the silt behind the dams and on the river side is highly contaminated with Arsenic and Chromium 6 which are highly toxic.

The relief sought in the Writ filed will allow us to clean up the silt and require that no dam in the United States may be removed without salmonprotectiondevice.com approval, shown below:

Dam removal Approval Procedure

Call 503-608-7611 x602 and ask where to submit these documents.

This applies to all private and publicly owned dams in the United States and its territories.

1. Clean water act by 33 U.S.C. §1251 Section 404, 408 or other appropriate section permit.

2. Army Corp of Engineers Joint Application result.

3. Chemistry test of any silt on the upstream side of the dam including mitigation of EPA listed chemicals.
https://salmonprotectiondevice.com/CDM_2011_0119_Screening_Level_Evaluation_of_Contaminants_in_Sediments_1.pdf

4. Does the Dam have a fishway (fish ladder)? If so is it working or filled with silt?

5. Detailed cost of dredging behind the dam.

6. Detailed cost of removing the dam.

https://salmonprotectiondevice.com/Dam_Removal_Application.pdf

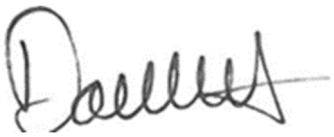
https://salmonprotectiondevice.com/Dam_removal_Approval_Procedure.pdf

Upload documents after filling them out here:

https://salmonprotectiondevice.com/dam-applications/

Conclusion

In conclusion, for the above reasons, this writ should be granted and the relief sought should be granted.



Certified by David C. White
November 26th 2025.

CERTIFICATE OF SERVICE
I hereby certify that on 11/26/2025, a true and correct copy of the above document shipped filed with the Clerk of the Supreme Court using Fedex. A copy of the document will be served upon interested parties via email by ORCP 9 C 3.
Solicitor General
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
SUPREMECTBRIEFS@USDOJ.GOV
Ph: 202-514-2217
Party name: FERC

Additionally, a courtesy copy is being provided as follows:
Also emailed to defendants by email service of

thelawisyourattorney.com to SUPREMECTBRIEFS@USDOJ.GOV

Via hand delivery
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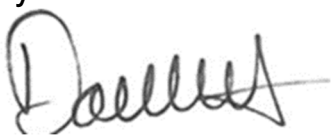
Via CM/ECF notification
to the extent registered DATED: 11/26/2025
By: David White



David White Pro Se 11/26/2025

From:	Paul, Debra - FPAC-NRCS, OR
To:	CENWP-PME-Williamette-Valley-System-EIS
Cc:	Paul, Debra - FPAC-NRCS, OR
Subject:	[Non-DoD Source] Linn SWCD Public Comment
Date:	Monday, January 12, 2026 12:42:36 PM
Attachments:	Linn SWCD USACE Comment Willamette.docm

Good afternoon,

We appreciate the opportunity to comment on this very important system in our valley.

Please see the attached letter.

Regards,

Debra Paul
Linn Soil & Water Conservation District
33935 Hwy. 99E, Suite C
Tangent, OR 97389

LINN SOIL AND WATER CONSERVATION DISTRICT

33935 HWY 99E
SUITE C
TANGENT, OR 97389

(541) 926-2483
FAX(541) 926-2369

LINN.SWCD@OACD.ORG

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May 15, 2026

U.S. Army Corps of Engineers
Attn: CENWP-PME-E / Willamette EIS
P.O. Box 2946
Portland, OR 97208-2946

Subject: Willamette Valley System Draft EIS

To whom it may concern:

We thank you for the opportunity to comment on the Supplemental Environmental Impact Statement for the Willamette Valley System, particularly as it relates to Detroit Dam in Marion County and Foster and Green Peter Dams in Linn County.

Linn Soil & Water Conservation District is very concerned about water quality and water quantity.

By its rapid drawdown from the rule curve of Green Peter in July of 2023, the decision negatively affected water quality with increased turbidity, increased Total Suspended Solids (TSS), increased erosion and sedimentation. As the reservoir pool decreased, additional cutting of the waterways above increased erosion. The rapid drawdown did not allow enough time for vegetation to grow on the steep banks to aid in filtration of eroded soils.

Reduced pool volume concentrated any pollutants contained in the reservoir. The South Santiam Subbasin has stream segments listed under section 303 (d) of the federal Clean Water Act.

Water supply is identified by the USACE as a reservoir benefit. The drawdowns will negatively affect water quantity available for irrigation, fish and wildlife, and hydropower production.

Moving forward, the region needs more water storage capacity and more electrical production; not less.

We appreciate your consideration of our concerns regarding water quality and water quantity as you determine your best option.

.

Sincerely,

David Neal

David Neal
Chair
Linn SWCD