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Willamette Valley System Operations and Maintenance Environmental Impact Statement

Public Scoping Report

December 2019

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Introduction

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

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

What is USACE Proposing to Do?

USACE is developing this EIS to address the continued operations and maintenance of the Willamette Valley System. Since the last EIS was developed in 1980, operations have been modified and structural improvements have been made, new information is available on the environmental impacts of operating and maintaining the system, and there has been a large amount of new information gained regarding Endangered Species Act (ESA)-listed species since the 2008 Biological Opinion (BiOp) for continued operation and maintenance of the Willamette Valley Project conducted by the National Marine Fisheries Service (NMFS).

What is Public Scoping?

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

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

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

Public Scoping Process for the WVS O&M EIS

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

Notice of Intent

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

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

Outreach

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

Table 1 provides more information about the outreach tools.

Table 1. Outreach Tools

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

Cooperating Agencies

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

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

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

- The Confederated Tribes of the Grand Ronde Community of Oregon
- Confederated Tribes of Warm Springs
- Confederated Tribes of Siletz Indians
- National Marine Fisheries Service
- U.S. Fish and Wildlife Service
- Bonneville Power Administration
- Bureau of Reclamation
- United States Environmental Protection Agency
- Oregon Department of Agriculture
- Oregon Department of Environmental Quality
- Oregon Department of Fish and Wildlife
- Oregon Water Resources Department

Public Scoping Meetings

As part of the public scoping process, USACE scheduled and facilitated five (5) public scoping meetings in June 2019 to engage with and inform the public on the development of

the EIS and solicit input and public comments. Meetings were held throughout the Willamette Valley to provide an opportunity for interested stakeholders from different communities to attend. Table 2 provides the dates and locations for the meetings that were held for this project.

Table 2. Dates and Locations of Public Meetings

Date	Location
June 4, 2019	Eugene Public Library
June 5, 2019	South Salem High School Library
June 6, 2019	Portland State University Conference Center
June 12, 2019	Corvallis-Benton County Public Library
June 13, 2019	Springfield City Hall

Figure 1. Photo of Public Meeting Set-Up at the Corvallis-Benton Public Library

Public Scoping Meeting Advertisement

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

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

Table 3. Newspaper Ads

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

Social Media

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

Table 4.Social Media Posts

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

Figure 2. Screenshot of June 4, 2019 tweet from USACE advertising the upcoming public meetings

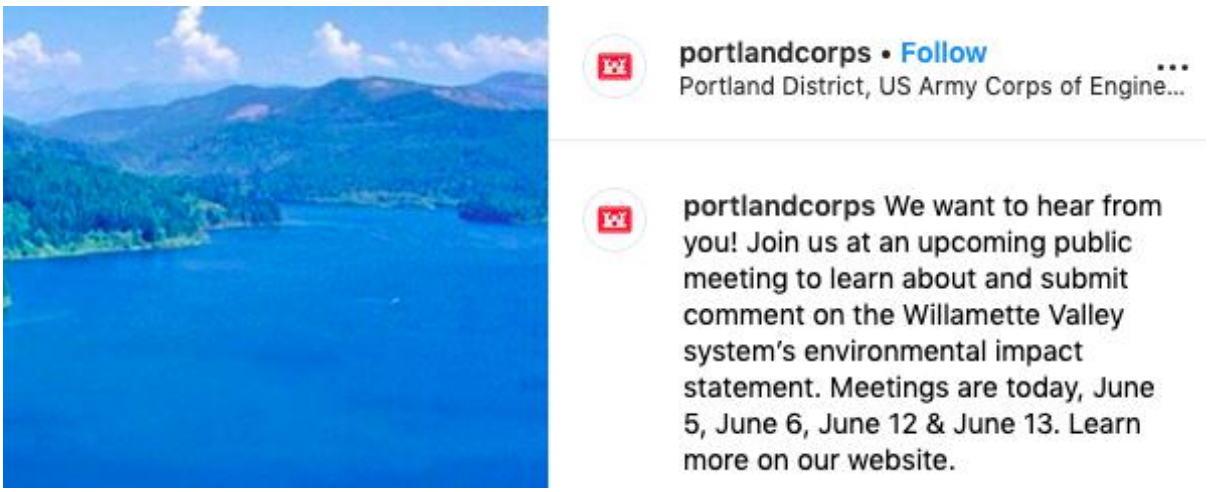

Figure 3. Screenshot of Instagram post from USACE advertising the upcoming public meetings

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

Table 5. Facebook Event Links

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

Meeting Schedule/Format

Meeting start times alternated between 4pm and 5pm to accommodate work schedules from members of the public who would likely attend on either behalf of their organization during the work day, or for those who preferred to attend after the work day.

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

Table 6 outlines the meeting format that was followed at each public scoping meeting.

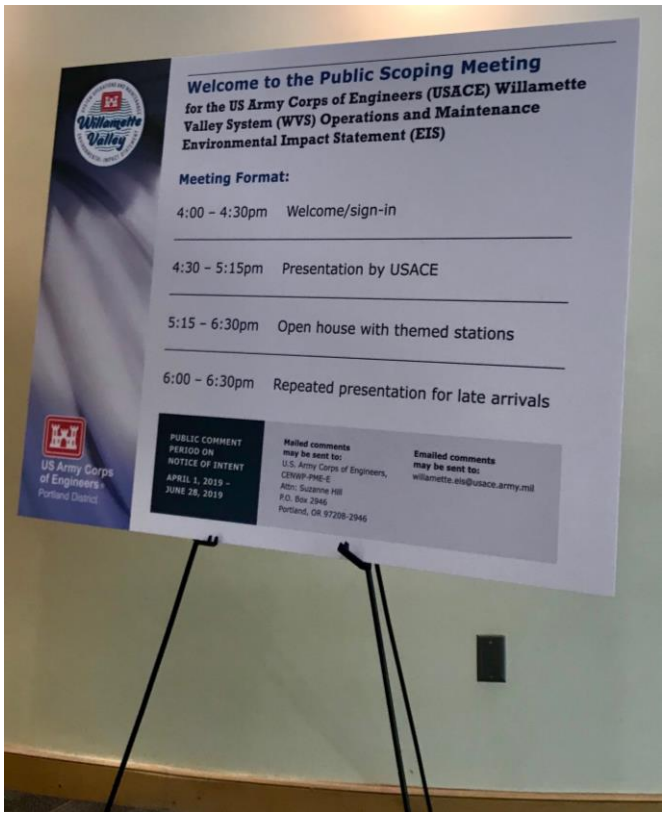

Figure 4. Photo of welcome board at entrance of the meeting room at the Eugene Public Library

Table 6. Meeting Schedule/Format

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

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

Meeting materials

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

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

Figure 5. Photo of "What is NEPA?" and "Project Background" poster boards on display at the Portland meeting

Meeting participant data

Figure 6 is a chart that shows how many people attended each of the public meetings (excluding USACE staff). The average number of meeting attendees was 16. The meeting in Salem had the highest number of attendees (22) and the meeting in Portland had the lowest (12). Meeting attendees provided meaningful input to USACE through discussions with staff at themed poster board stations and the WVS map.

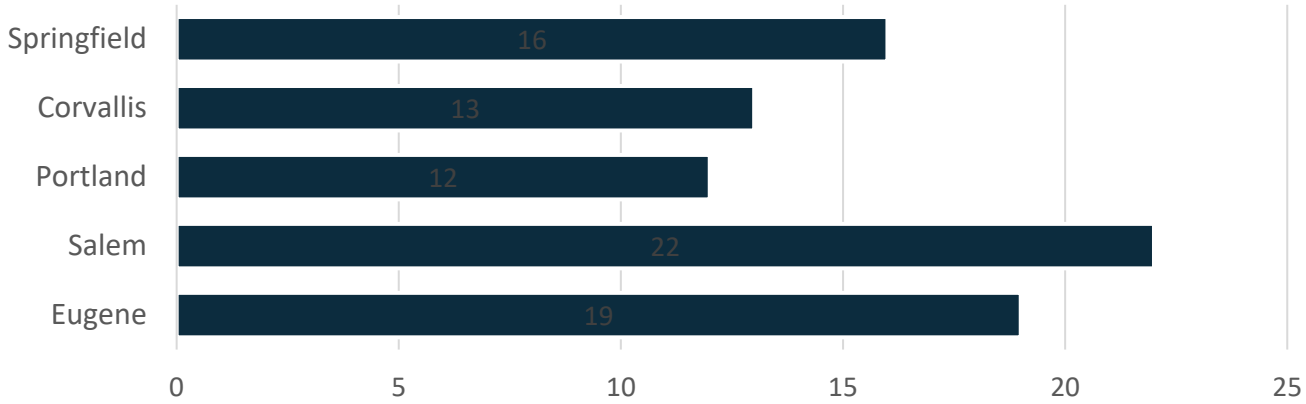

Figure 6. Chart: Number of Participants per Meeting

Figure 7 is a graph that shows how public meeting attendees heard about the meeting, based on data collected from meeting attendees on the sign-in sheet. The maiority of meeting attendees indicated they heard about the meeting from some explained as via word of mouth, walk-in, and that they heard about meetings directly from USACE staff members.

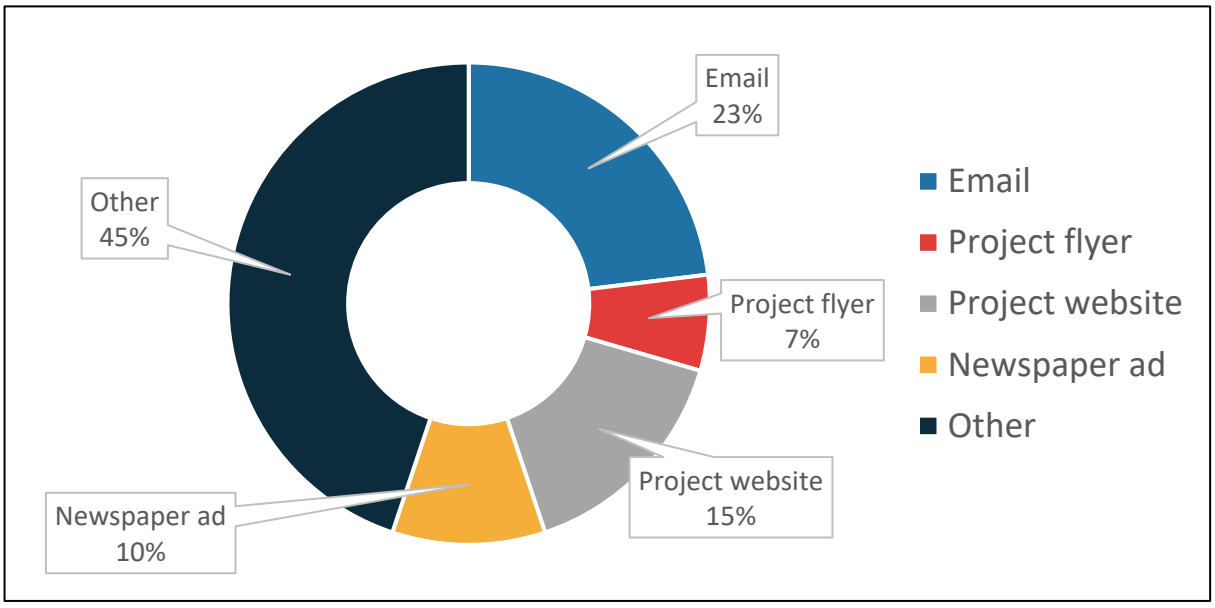

Figure 7. Graph: Meeting Participants by How they Heard about the Meeting

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

Silverton. This data was obtained from information that attendees filled in themselves on the sign-in sheet.

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

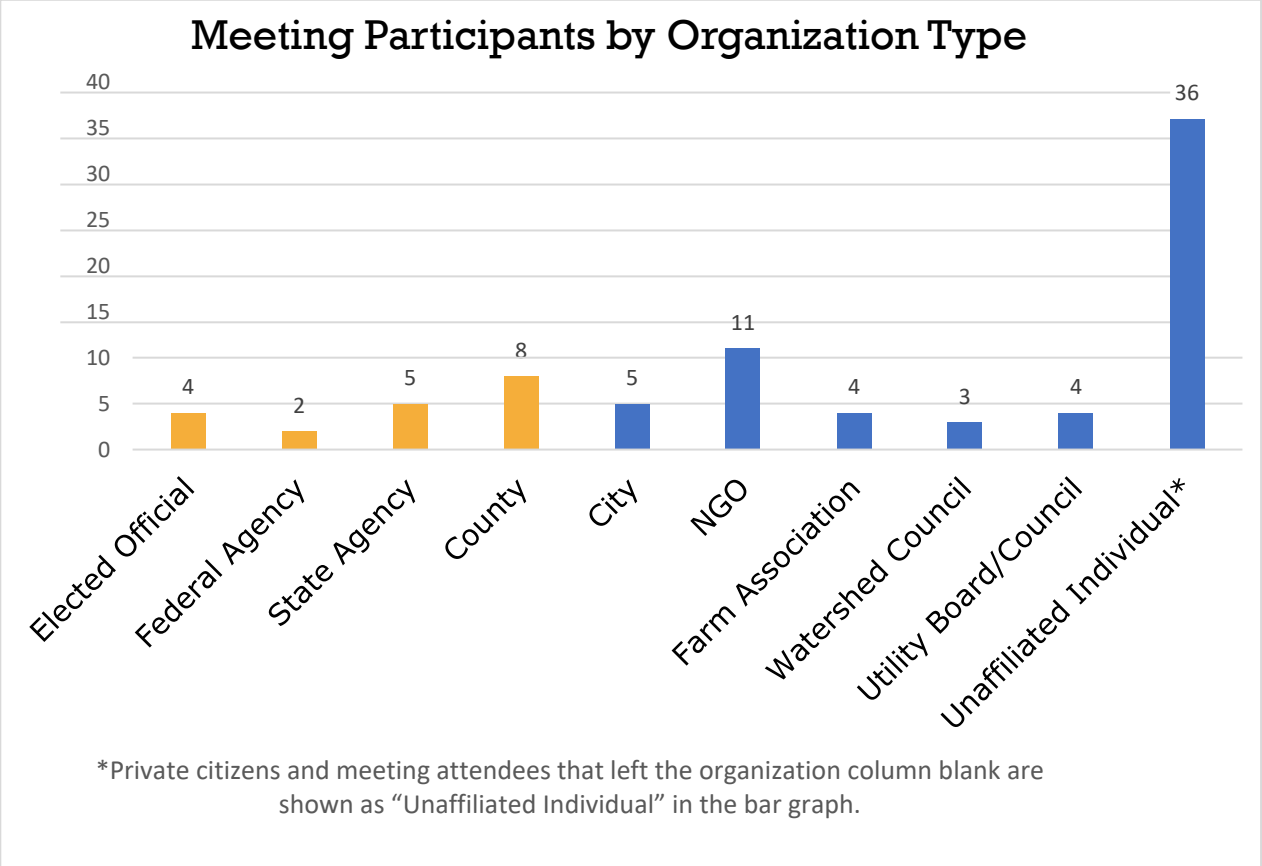

Figure 8. Bar Graph: Number of meeting attendees by organization type

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

Public Scoping Comment Summary

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

Comment Collection Methods Used

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

Public Scoping Comment Analysis Process

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

The comment analysis process began with organizing correspondence received during the public scoping period and assigning them with document IDs. All of the correspondence documents were read in their entirety by the content analyst, and then broken down into separate comments by individual topic/concern and assigned a comment ID number. Comments were then added to the comment database, where they were summarized and assigned one (1) topic and up to three (3) subtopics.

Public Scoping Comment Submission Received (# of Correspondences)

Figure 9 and Figure 10 show the number of comments received by correspondence type and organization type. Tables 7 and 8 identify the number or comments received by topic, and subtopic.

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

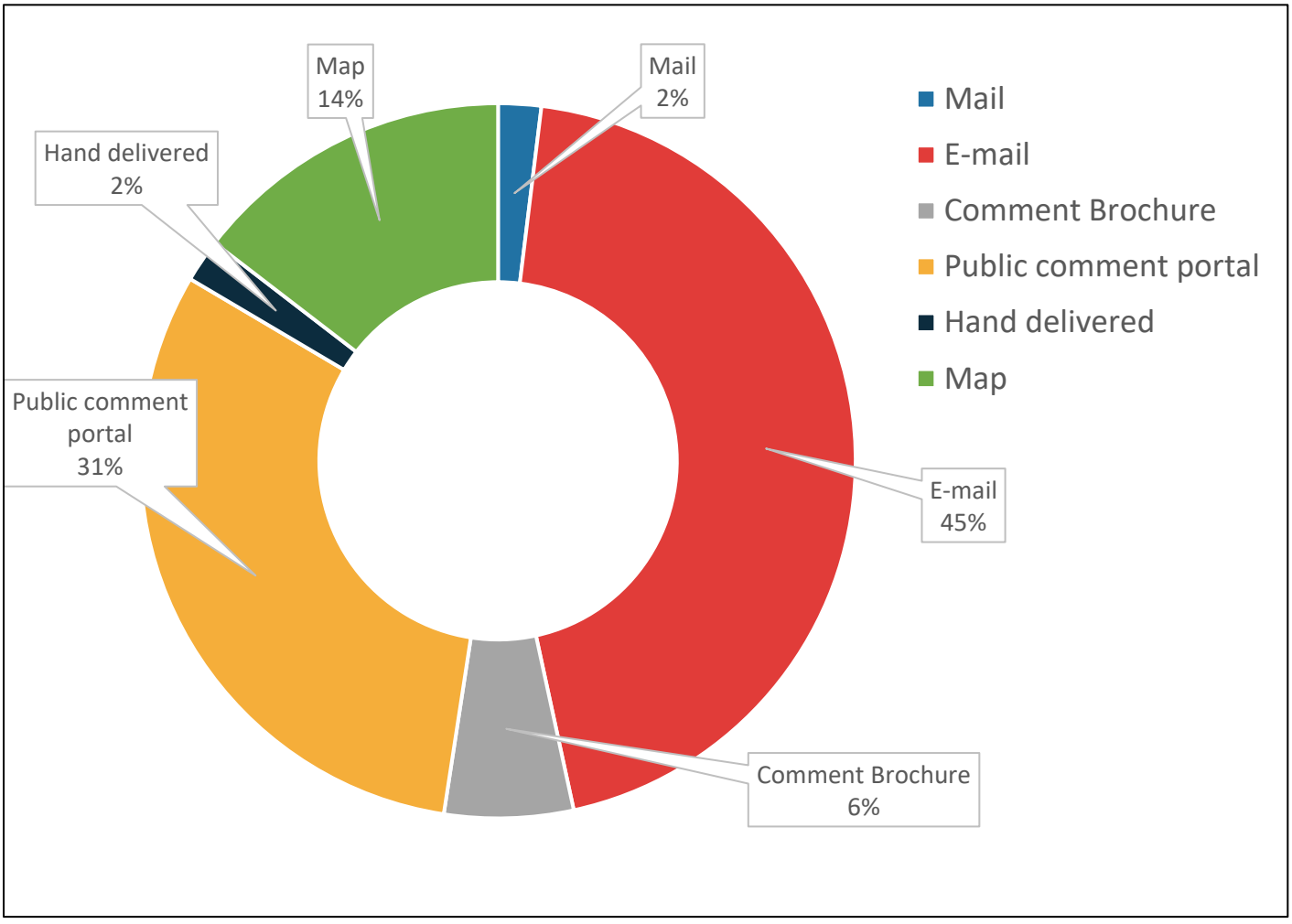

Figure 9. Graph: Comments Received by Correspondence Type

As stated previously in the *meeting participants by demographic* section, USACE anticipated a variety of stakeholder types to submit public comment documents because of the large scope of the project. As the bar graph in Figure 10 depicts, the majority of comment documents came from unaffiliated individuals (50 correspondences), followed by NGOs (12 correspondences) and Watershed Councils. (11 correspondences). The remaining comment documents were submitted on behalf of other organizations in small numbers (less than 8 correspondences) from various stakeholder groups including comment documents representing Tribal interests and from individuals associated with agricultural groups or individual farms.

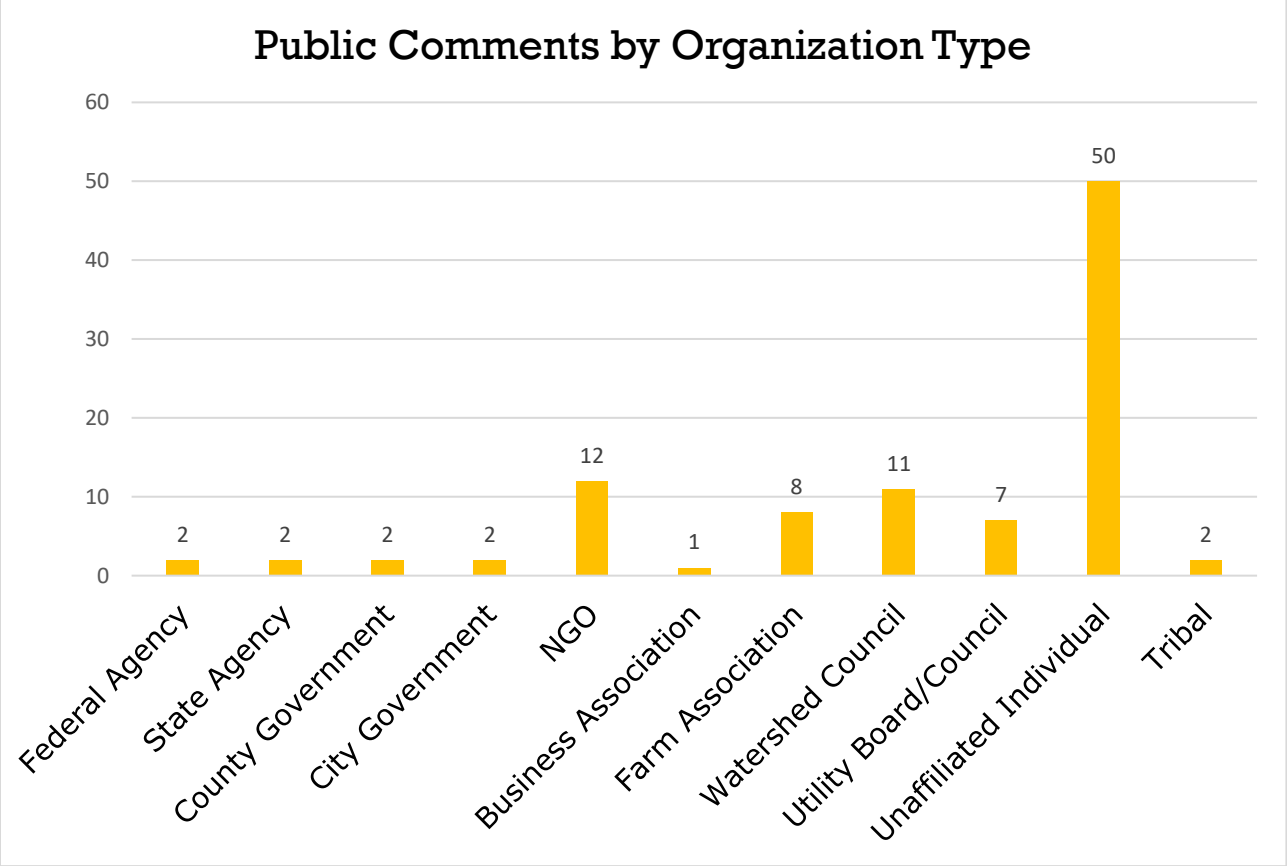

Figure 10. Graph: Public Comments by Organization Type

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

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

Table 7. Comments Received by Topic

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

The comments were further categorized under 1-3 subtopics to allow USACE to better understand the input received from the public. This section describes the subtopics that were addressed in the majority of comments because they represent the issues that many stakeholders are concerned about, but is not intended to fully capture all concerns or ideas raised. The full list of subtopics and associated number of comments submitted for each can be found in Table 9. To review all public comment documents received during the scoping period, please see the Appendix J. Below is a summary of the most predominant subtopics that were identified.

Endangered Species Act

136 comments were received regarding ESA listed species and/or compliance. The Chinook salmon, Steelhead trout, and bull trout, which are native to area waters and are listed as threatened under the Endangered Species Act. Many of the comments focused on how water conditions (flow, pollution, temperature, barriers) will impact fish passage and generally affect fish populations. Comments zeroed in on the impacts of dams on anadromous fish and other interrelated threats. Concerns ranged from interruptions to fish migration patterns to more general ecosystem impacts. Many comments directly addressed the issue of fish passage and fish migration.

Flood Risk Management

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

NEPA Process

There were 49 comments pertaining to the NEPA Process. These comments focused on the scope of the EIS, the review process, and what elements USACE would be taking into consideration in the analysis including other ongoing NEPA analyses in the WVS. For example, some comments related to the definition of the no action alternative and the baseline conditions for the EIS. Other comments addressed the potential cumulative impacts of operations and maintenance of the dams on natural resources and ecosystems. Many comments pertained to the scope of the EIS and what it should include. For example, some commenters advocated for the EIS to incorporate recent research on fish habitats, consider water allocation and storage, and water flows.

Water Storage and Allocation

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

Note: Each comment was assigned 1-3 subtopics. A total of 555 subtopics were assigned to 384 comments (Table 8.)

Table 8. Comments Received by Sub-Topic

Sub-Topic	# of Comments Received
Adaptive management	5
Air quality	1
Analytical methods	1
Climate change	15
Cooperating agencies	4
Cultural resources	2
Cumulative effects	6
Dam removal	8
Dam safety	1
Ecosystem services	5
Education/outreach	1
ESA	136
Fish and wildlife	12
Flood risk management	48
Habitat	6
Hatchery	8
Health and safety	1
Hydrology	1
Hydropower	15
Navigation	3

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

Summary Table: Public Scoping Comments

Table 9 provides a summary of the comments received during the scoping period. The summary table includes the main suggestions, issues, and concerns from public comments organized by topic (alternatives, authority, EIS general, environmental impacts, and mitigation). Comments were summarized together and identified as "General" when more than one commenter expressed the same or similar concern for the purposes of this table. All of the comment documents received for the scoping period are included in Appendix J of this report.

Table 9. Public Scoping Comment Summary

Topic	Commenter	Comment
Alternatives	General	O&M in the WVS needs to be modified to protect the ESA-listed species.
Environmental Impacts	General	Consider the impact of hatcheries on wild fish and the natural ecosystem with any proposed alternatives.
Alternatives	General	Consider and evaluate alternatives that modify, reduce, or eliminate hydropower production.
Alternatives	General	Consider alternatives that modify dams not vital for flood control to operate as run-of-river or analyze the complete removal of these dams to support ESA-listed species.

Topic	Commenter	Comment
Alternatives	General	Consider altering the rule curves to benefit needed flows for ESA-listed species while maintaining the primary authorized purpose of the WVS of flood control.
Alternatives	General	Consider alternatives that include both expedited, interim measures to aid in the survival of the ESA species in the near term, as well as longer-term measures for structural and operational changes that will provide longer-term solutions that address fish passage solutions.
Alternatives	General	Consider action alternatives in sub basins that take into account drawdown for fish passage and temperature control structures and operations.
Alternatives	General	Consider measures to improve juvenile dam passage survival, including cost-effective options to meet downstream temperature and fish passage requirements, opportunities to modify existing revetment to benefit floodplain function and improve juvenile fish productivity. Consider adaptive management options if proposed actions do not meet intended conservation goals.
Alternatives	General	Consider measures to reduce total dissolved gas levels.

Topic	Commenter	Comment
Alternatives	General	Need to maintain the system for flood control and irrigation storage. Concerns regarding water availability for agricultural livelihoods.
Alternatives	General	Need to develop process for USACE to work with landowners when a revetment fails to determine if alternatives to replacement/reinforcement exist.
Environmental Impacts	General	Concerns of shoreline/bank erosion because of risk of landslides and land that is being lost.
Environmental Impacts	General	Evaluate how any modifications to O&M and flow will impact boating facilities, navigation, floating structures, and safety.
Environmental Impacts	General	USACE should consider the recreational and human health value of Fern Ridge Reservoir for sailing and other water sports.
Alternatives	General	During the fall draw down, consider ways to optimize flows for boating and whitewater paddling.
Alternatives	General	USACE should improve boater access points and better communicate with law enforcement regarding river access.

Topic	Commenter	Comment
Alternatives	General	Consider additional recreational releases, especially during summer months, for boaters and whitewater paddling.
Environmental Impacts	General	USACE should consider drinking water needs of reliant communities.
Environmental Impacts	General	Evaluate the impact of algae blooms on drinking water and recreation.
EIS General	General	Concern regarding USACE's maintenance of revetments and erosion.
Alternatives	General	Consider environmental impacts of revetments and evaluate alternatives to address problems caused by them.
Alternatives	General	Examine opportunities to remove/modify revetments to increase extent and duration of floodplains and off channel habitats and provide ecological benefits with a low risk to infrastructure.
Alternatives	General	Examine how to develop a process to work with landowners and local partners when a revetment fails.

Topic	Commenter	Comment
EIS General	General	USACE should consider building in a review and update process into WVS operations, to take advantage of new information as it is being made available, or at some predetermined time frame.
Environmental Impacts	General	Consider/evaluate impacts of recreational fishing on listed fish.
EIS General	General	Incorporate recent research on river processes and habitat needs from the research facilities in the Willamette Valley such as U of O SLICES Framework, cold water refuge and geomorphic mapping, fish distribution, and Willamette Water 2100 modeling results.
Alternatives	General	EIS should examine flow operations that protect infrastructure while balancing water quality and habitat needs for native species.
Mitigation	Willamette Salmon Steelhead Recovery Coalition	What is the Corps mitigation obligation at present given constraints to hatchery production identified in the draft HGMPs? How does the Corps expect that obligation to change over the timeframe for the analysis period?
Authority	Willamette Salmon Steelhead Recovery Coalition	Will the Corps commit to requesting and allocating funds necessary to sustain sufficient research and monitoring needs?

Topic	Commenter	Comment
Environmental Impacts	Willamette Salmon Steelhead Recovery Coalition	Volitional vs. Non-Volitional Downstream Passage: Given difficulties with similar fish collection projects like Pelton Round Butte and Lewis River, why does the Corps expect the proposed fish collection projects will be successful? Has the Corps analyzed whether the flows and effective forebay sizes of Detroit and Cougar will yield sufficient collection efficiencies to support the agency's claims? Has the Corps analyzed the impact of copepod-related morbidity of volitional vs. non-volitional passage routes? Why did the Corps exclude the volitional bypass pipe proposal from Cougar project's NEPA analysis? What are the projected ongoing costs associated with these non-volitional proposals?

Topic	Commenter	Comment
Environmental Impact	Willamette Salmon Steelhead Recovery Coalition	Cougar Downstream Passage - A prototype fish collector was evaluated at Cougar with results indicating that the collection efficiency of juvenile downstream migrants was quite low; why will the current design be more successful? What are the expected collection efficiencies? Will the collection rate be significantly superior to volitional routes via reservoir drawdowns that have been evaluated in the past? The Corps noted that drawdowns and passage through the diversion tunnel may not be feasible due to structural issues. Could these infrastructural issues be resolved through redesign or engineering?
EIS General	Willamette Salmon Steelhead Recovery Coalition	Lookout Point Downstream Passage: Why did the Corps fail to proceed with implementation of the proposed action analyzed through NEPA regarding drawdown operations at Lookout Point to assist in juvenile downstream passage? Will drawdown operations at Lookout Point by analyzed?

Topic	Commenter	Comment
Alternatives	Willamette Salmon Steelhead Recovery Coalition	Flows: How will flow targets be defined? How will the ongoing reallocation process inform the development of alternatives in this process? If it will be integrated, then how does the fact that NMFS determined the proposed reallocation would result in jeopardy get resolved in advance of the Systems analysis without derailing the proposed timeline for this process and the formulation of the next BiOp? Will flow targets for fish (or at least listed fish) be met even in shortage years? Doesn't it make sense to postpone reallocation and make it part of the new BiOp/EIS process? Will the EIS consider and propose administrative structures for contracts to protect water released for fish from diversion downstream under "live" flow water rights?

Topic	Commenter	Comment
Authority	Willamette Salmon Steelhead Recovery Coalition	How will the Corps address the different authorities that often result in operational conflicts for the projects in the analysis? Will the Corps consider O&M changes that impact the fulfillment of authorized purposes (other than flood control and human health/safety) if they assist with meeting ESA obligations? What are the specific recovery actions that the Corps may implement but lack sufficient legal authority? Will the agency seek Congressional approval and what is the timeline?
EIS General	Willamette Salmon Steelhead Recovery Coalition	Why has the agency failed to meet the 2008 BiOp timeline and initiate the required actions relating to downstream passage in Middle Fork Willamette? How can the agency assure Congress and the public that future timelines will be met? What actions from the 2008 BiOp will be taken in the interim of the new BiOp?
Alternatives	Willamette Salmon Steelhead Recovery Coalition	How will the COP II report inform alternative development and NEPA analysis?

Topic	Commenter	Comment
Alternatives	Willamette Salmon Steelhead Recovery Coalition	At the February 22, 2019 event, Corps and BPA reps indicated that the agencies are considering alternatives for hydropower production at Cougar Dam and for the Willamette Project to assist in downstream passage and necessary recovery measures. What modifications to hydropower are being evaluated? Are agencies considering eliminating peaking power, modifying power operations to provide downstream volitional passage routes for listed fish (i.e. turning turbines off and performing drawdowns during peak migratory periods), or consider changes or removal for the non-flood control reregulating dams (Big Cliff and Dexter) in order to assist with fish passage and recovery efforts?
Alternatives	Willamette Salmon Steelhead Recovery Coalition	Will the Corps review/remodel rule curves? Will analysis include consideration of run of the river, delayed refill, or drawdowns to facilitate juvenile downstream passage and support recovery efforts?
Environmental Impacts	US EPA Region 10	Consider different dam O&M scenarios on current and predicted water temp, hyporheic flow, and reductions in river flow rate.

Topic	Commenter	Comment
Environmental Impacts	US EPA Region 10	Contaminants found in river systems like PCBs, PAHs, PBDEs, DDT, and other legacy pesticides, mercury, current use pesticides, pharmaceuticals, and personal care products and trace elements can impair water quality, affect aquatic organisms like insects and salmon and resident fish and impair environmental and human health. Include impacts of reservoir O&M on mobilization and transformation of inorganic mercury and methylmercury. Include impact of reservoir stratification, food web dynamics/fish stocking, vegetation management, nutrient loading and water-level fluctuations on methylmercury production and bioaccumulation. Analyze how reservoir operations might be altered to reduce methylmercury production and bioaccumulation.

Topic	Commenter	Comment
Environmental Impacts	US EPA Region 10	Disclose water quality standards including State's numeric standards, narrative standards, designated uses and antidegradation provisions. Identify and disclose current water quality of water bodies likely to be impacted by the project, nature of potential impacts, and specific discharges and pollutants likely to impact the waterbodies. Analyze effects of O&M on surface water temps, total dissolved gas, pH, dissolved oxygen, sediment quantity and quality, nuisance algae. Use models to analyze temp, dissolved oxygen, and nuisance algae in reservoir and downstream.

Topic	Commenter	Comment
Environmental Impacts	US EPA Region 10	Describe relevant TMDL allocations, the water bodies to which they apply, and associated water quality standards and pollutants of concern. Identify water bodies with approved TMDLs that remain impaired. Identify waterbodies potentially affected by the project that are listed as impaired on the State of Oregon's most current EPA-approved 303(d) list. Include measures to control existing sources of pollution to offset additional loading if additional pollutant loading is predicted because of the project. Describe restoration and enhancement efforts for impaired waters, how the proposed project will coordinate with on-going protection efforts, and mitigation measures. Use information from the 2006 Willamette River Basin Mercury TMDL revision process in the EIS for mercury cycling, for example the Mercury TMDL Development for the Willamette River Basin (Oregon) Technical Support Document.
Environmental Impacts	US EPA Region 10	Describe how CWA antidegradation requirements will be met.

Topic	Commenter	Comment
Environmental Impacts	US EPA Region 10	Describe alternatives effects on sediment loads in reservoirs: characteristics, location, transport; physical and chemical characteristics throughout the affected watershed.

Topic	Commenter	Comment
Environmental Impacts	US EPA Region 10	Though no CWA 404 permit is issued for discharges associated with Corps civil works projects, we recommend that the admin record demonstrate and document compliance with CWA Section 404(b)(1) guidelines for disposal sites for discharges or dredged or fill material into WOTUS. Identification of LEDPA is achieved by performing an alternatives analysis that estimates the direct, secondary, and cumulative impacts to jurisdictional waters resulting from each alternative considered. An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics. The admin record should be sufficiently detailed to identify the LEDPA. Under the guidelines, discharges of dredged or fill material are not permitted if they will cause or contribute to significant degradation of WOTUS. Guidelines establish specific approaches to evaluate effects on: human health or welfare; the life stages of aquatic life, other wildlife dependent on aquatic environment; aquatic ecosystem diversity, productivity and stability; recreational, aesthetic, and economic values.

Topic	Commenter	Comment
Environmental Impacts	US EPA Region 10	Consider adverse and disproportionate impacts to minority and low-income populations re: exposure by minority and low-income populations to environmental hazard and human health or environmental impacts on minority and low-income populations.
EIS General	US EPA Region 10	Describe tribal consultation in terms of identifying affected tribes, notification, tribal input, and follow-up to demonstrate consistency with EO 13175.
EIS General	US EPA Region 10	Show evidence that basic steps for effective public involvement have been taken.
Environmental Impacts	US EPA Region 10	Discuss reasonably foreseeable effects on changes in climate on the proposed project and project area including on long-term infrastructure to inform development of measures to improve the resiliency of the proposed project. If climatic changes exacerbate environmental impacts of the project, consider these impacts in the EIS.

Topic	Commenter	Comment
Environmental Impacts	US EPA Region 10	Evaluate and disclose air quality implications from power production- each alternative will fit differently into the energy production portfolio of the Northwest. The EIS should consider the emissions associated with various configurations, and articulate assumptions about how and from where power would be sourced in the absence of hydropower production. Evaluate emissions associated with maintenance dredging operations at the dams; and emissions associated with internal combustion engines used in O&M.
Environmental Impacts	US EPA Region 10	Utilize project-specific thresholds for level of impact and apply to EIS analysis of environmental impacts as a strategy for meeting the intent of CEQ's NEPA regs.
EIS General	US EPA Region 10	Include a statement of purpose and need consistent with implementing regulations for NEPA and involve interested agencies and stakeholders in the development of the P&N statement.

Topic	Commenter	Comment
Environmental Impacts	US EPA Region 10	Resources, ecosystems, and communities should be characterized in terms of their response to change and capacity to withstand stresses. Focus on resources that are "at risk" or have the potential to be significantly impacted by the proposed project.
Alternatives	US EPA Region 10	Identify and select alternatives that maximize environmental benefits, and avoid, minimize, and/or otherwise mitigate environmental impacts. We support actions that restore natural processes and recommend that you consider an EIS alternative that maximizes opportunities to restore natural hydrologic, geomorphic, and biological processes.
Environmental Impacts	US EPA Region 10	Discuss and estimate the potential for reduced ecosystem functions from a less dynamic floodplain downstream.
Environmental Impacts	US EPA Region 10	Assess impact and changes on ecosystem services relative to baseline and integrate analysis into decision making.

Topic	Commenter	Comment
Environmental Impacts	Columbia River Inter-Tribal Fish Commission	Consider how shifting water flow will affect quality of the basin by diluting pollutants, affecting water temperature, and availability of dissolved oxygen for aquatic species. Consider impact on ESA-listed steelhead and chinook reliance on flow to dilute concentrations of toxins.
EIS General	Columbia River Inter-Tribal Fish Commission	Willamette River Reallocation EA models show BiOp flow requirements are not consistently met and are missed significantly in years of insufficient water availability.
Environmental Impacts	Columbia River Inter-Tribal Fish Commission	Consider the effects of the hydropower system on reservoir ecology such as invasive species, algae, seaweed, altered flood dynamics, sequestration of sediment, sand bars, water quality issues, and changes in temperature.
Alternatives	Columbia River Inter-Tribal Fish Commission	Alternatives should use a range of fish metrics and data, including reach survival, project survival and delayed mortality using various models and tools and not just the COMPASS model.
Environmental Impacts	Columbia River Inter-Tribal Fish Commission	Look at cumulative impact of this and other on-going projects in the Willamette Basin to address mitigation needs for lamprey.

Topic	Commenter	Comment
Environmental Impacts	Columbia River Inter-Tribal Fish Commission	Analyze socio-economic benefit that mitigation funded tributary actions have on local communities, both tribal and non-tribal, and how those benefits change under various alternatives.
EIS General	Columbia River Inter-Tribal Fish Commission	Federal agencies must use their authorities to protect and enhance, not degrade, fish species that underlie treaty fishing rights. Northwest tribes by virtue of treaty have co-management status on fisheries resources and are required to have meaningful consultation on actions including non-tribal fisheries, hatchery production, protection of natural spawning environment, and protection of downstream and upstream migration.
Alternatives	Columbia River Inter-Tribal Fish Commission	Consider alternatives to improve flow and migration for juvenile and adult lamprey, an important food source for tribes in the basin.

Topic	Commenter	Comment
EIS General	Columbia River Inter-Tribal Fish Commission	Salmon and lamprey are tribal cultural resources that play an integral part of tribal religion, culture, and physical sustenance and of the economies of the region for thousands of years. Salmon are important for the ecosystem. USACE will need to work closely with Columbia River Intertribal Fish Commission during analysis of cultural resources.
Alternatives	Columbia River Inter-Tribal Fish Commission	Corps should explore how its ecological mission for biodiversity and mitigating the impacts of Corps infrastructure can be strengthened through cultural diversity and the knowledge and skills held by Native peoples.
EIS General	Columbia River Inter-Tribal Fish Commission	Climate change was not thoroughly taken into consideration in the Willamette River Basin EA and evaluation is essential to an accurate WVS O&M EIS. Assess possibility that reservoirs may not adequately fill since tributaries like North Santiam are snowpack driven, which may be affected differently than rain-driven tributaries. Climate change will affect local flows and timing of flows that are relief upon in the data to meet BiOp objectives. Temperature of water will also be affected and lamprey, steelhead and chinook may require more flow.

Topic	Commenter	Comment
Alternatives	WaterWatch of Oregon	Consider which regulated flows could be shifted more towards the historic natural hydrograph and the impacts on fish, wildlife and flood risk including how temperature and flow variability effect fish populations and migration to determine whether there is any correlation with variations from expected unregulated flow vs. particular flow levels.
Authority	WaterWatch of Oregon	Consider whether USACE has regulatory authority to help mitigate for impacts of dams in the Willamette Basin.
EIS General	WaterWatch of Oregon	WBR to reallocate storage space in reservoirs should be delayed and merged into this process for further consideration. This EIS and NMFS BiOp will better inform how reservoir storage capacity should be allocated. Delay would be minimal relative to timeline for allocation and could be used to implement actions in anticipation of reallocation, such as creating mechanisms to protect stored water released for fish from downstream diversions. Allowing reservoir reallocation to proceed separately would represent an irreversible and irretrievable commitment of resources.

Topic	Commenter	Comment
Alternatives	WaterWatch of Oregon	Evaluate alternatives that do not reserve water in reservoirs for power pools and minimum storage. That could make more water available to meet downstream flow needs and better allow reservoir "drawdown" to aid fish migration.
Alternatives	WaterWatch of Oregon	Consider alternatives for protecting stream flows for the benefit of fish and wildlife. Consider transferring portions of USACE water storage rights to instream water rights (Note this is different from creating instream water rights for the use of stored water). Consider strategies for protecting stored water released for instream use from being diverted downstream.
Environmental Impacts	WaterWatch of Oregon	Consider impacts of WVP on all species of fish, wildlife, and plants, not just those T&E such as cutthroat trout, Coho salmon, lamprey, amphibians and plants.

Topic	Commenter	Comment
Environmental Impacts	WaterWatch of Oregon	Include flow modeling using the most recent flow data and expected future impacts of climate change A new flow dataset through 2018 is or should be soon available. Modeling should evaluate flows under numerous different scenarios for operation of the reservoirs, including proposed reservoir allocations to agricultural irrigation and municipal and industrial use.
Alternatives	WaterWatch of Oregon	Consider modifications to the rule curves to accommodate consideration of additional flow scenarios.
Alternatives	Andrew Chione	Native fish conservation should be prioritized over hydropower due to decline in hydropower value and critical situation of ESA-listed fish species.
EIS General	Andrew Chione	Coordinate with state agencies to conduct water quality sampling on reservoirs in the Willamette system, esp. those that have drinking water intakes downstream. The water crisis in Salem last year should be a wake-up call to better monitor cyanobacteria blooms for public safety.

Topic	Commenter	Comment
Environmental Impacts	Center for Biological Diversity, et. al	EIS should consider the survival of both ESA-listed salmon in the Willamette Valley and the Southern Resident killer whale (orca) population by reviewing the best available science to determine whether the proposed O&M should be modified and mitigated to address dramatic decrease in salmon populations compared to historic numbers and the impact of this decline on other ESA-listed species that depend on the salmon as a significant food source, such as the Southern Resident orcas.
Alternatives	Center for Biological Diversity, et. al	EIS should include a full analysis of changes that give salmon recovery a high priority and assess any action for effects on salmon availability for Southern Resident orcas. USACE should review the recovery plan and use its authorities to rebuild depleted populations of salmon and other prey to ensure an adequate food base for recovery of the orcas.
Environmental Impacts	Long Tom Watershed Council	Concern for three check dams below Fern Ridge reservoir that are barriers to resident native fish movement throughout the system and into tributaries.

Topic	Commenter	Comment
Alternatives	Long Tom Watershed Council	Consider the merits of providing both upstream and downstream fish passage at Fern Ridge, including the harm in facilitating the movement of non-native fish above dam versus the benefits of providing greater connectivity for native species throughout the system is unclear.
Alternatives	Long Tom Watershed Council	Evaluate opportunities for flood risk mitigation and complementary needs for floodplain habitat restoration to address flood control and habitat enhancement simultaneously.
EIS General	Long Tom Watershed Council	Partnership Funding: The Corps should, where appropriate, seek to expand the opportunities for public/private partnership to leverage technical expertise and community engagement capacities of local partners, and simplify the process through which local Army Corps staff can direct discretionary funding to address critical needs and capitalize upon partnership opportunities locally.
Environmental Impacts	Long Tom Watershed Council	Consider invasive species control measures such as seasonality of growth and preferential control methods, etc., when considering the impacts of dam operations.

Topic	Commenter	Comment
EIS General	Long Tom Watershed Council	Opportunities exist to improve and restore habitat function in the lower Long Tom, while supporting the flood risk mitigation mission of the Fern Ridge project.
Alternatives	Long Tom Watershed Council	Habitat value of Amazon creek diversions and opportunities for resource enhancement (if any) through a more naturalized channel should be evaluated.
Environmental Impacts	McKenzie Flyfishers	Concern that the populations of ESA threatened species could be extirpated within the next ten years.
Mitigation	McKenzie Flyfishers	Monitor each juvenile fish down-stream passage project carefully due to the uniqueness of each project's rearing habitat, reservoir conditions, and dam structure to assure that the project is proven to contribute to the recovery of the local fishery.
Alternatives	McKenzie Flyfishers	Variation in the timing of outmigration among and within species could favor volitional fish passage systems and advantages and disadvantages should be carefully evaluated for each program.

Topic	Commenter	Comment
Alternatives	McKenzie Flyfishers	Need to assure that fish passage programs support above-dam wild fish sanctuaries. Most fish passage program documentation does not specify procedures to assure that fish moving above formerly barrier dams are actually wild fish, consistent with ESA-listed designations.
Environmental Impacts	McKenzie Flyfishers	Concern that any management policy for water allocation must meet standards in the forthcoming NMFS BiOp and that changes in water management must consider recovery of the basin fishery and obligations under ESA.
Alternatives	McKenzie Flyfishers	USACE Willamette Project documents have not shown estimates of likely effects of climate change or how this could impact the allocation of water. Management and maintenance of dams should have sufficiently flexible policies and procedures to deal with climate change uncertainties and not be constrained by rigid parameters such as fixed curve rules which can make accommodations difficult.

Topic	Commenter	Comment
EIS General	NOAA Fisheries West Coast Branch	Recommend the Corps revise the schedule by reducing the timelines for completing the ROD to April 1, 2021, or as near to that date as possible per EO 13807 'Establishing Discipline and Accountability in the Environmental Review and Permitting Process or Infrastructure Projects', or explain the circumstances that make the 2yr schedule infeasible.
Alternatives	NOAA Fisheries West Coast Branch	Recommend the Corps define their no action alternative using the current status quo and not include the large fish passage and water quality structures that are still being designed and are not currently funded. When developing alternatives, include a broader range of actions that may reasonably occur, such as elements that may be required by the next BiOp.

Topic	Commenter	Comment
Alternatives	NOAA Fisheries West Coast Branch	Action alternatives systemwide: improve or replace some adult release above dams; maintenance of mainstem Willamette River juvenile monitoring/sampling facility; interim passage operations prior to completion of downstream passage facilities; installation and maintenance of new instream flow gages; research regarding passage design and effectiveness at new facilities and in sub basins with new adult reintroductions above dams; structural improvements to reduce water quality impacts during emergency and unusual events; additional habitat improvement/restoration projects in the lower tributaries and mainstem.
Alternatives	Oregon Wild	Consider alternatives that will allow rivers, floodplains and ecosystems to function more naturally including removing revetments in some areas to allow the river to access its historic floodplain and considering targeted land acquisition in the floodplain to facilitate avulsion and river dynamics.

Topic	Commenter	Comment
EIS General	Oregon Wild	Concern separate efforts to allocate stored water in the WVS might limit restoration options under EIS. Integrate planning efforts to avoid making commitments in the Willamette Basin Review process that would limit options for conservation and restoration under this planning effort.
Alternatives	Oregon Wild	Consider alternatives that will plan for changes expected as a result of climate change, such as less snowpack, higher and more frequent bank-full flows, and lower summer stream flows. Consider working with public and private land managers in the Willamette Basin to maintain/ increase carbon storage in forests to help reduce effects of climate change, and reduce land management activities that exacerbate peak flows and low flows, including cumulative landscape coverage of clearcuts, roads, dense young plantations.
Alternatives	Oregon Wild	Consider alternatives that will expand efforts to conserve native species such as salmonids and river otters, lamprey, mussels, turtles, salamanders, frogs, and macroinvertebrates. There may be beneficial adjustments to system operations or more targeted habitat restoration efforts that would benefit these species.

Topic	Commenter	Comment
Alternatives	Oregon Wild	Consider alternatives that will remove weeds from river banks and gravel bars so that native plants can continue to play their role in river ecology.
EIS General	Erik Burke	Rivers are being[s] with rights and it is unethical to enslave and control them with dams. I strongly believe in removing all 13 dams in the Willamette system.
EIS General	Judith Marshall	Evaluate operating cost of WVS including the costs of mitigation for listed fish and the mitigation for the dams vs. fish propagation at the hatcheries to determine if the federal government might be operating a system that is no longer cost effective to achieve flood control.

Topic	Commenter	Comment
EIS General	Judith Marshall	Concern that pursuing allocation of reservoir storage/water on the Willamette Basin Review will prejudice possible alternatives and decisions on WVS EIS. Further allocation cannot occur without the WVS O&M, and therefore it is not justified independently of the WVS program. Additionally, the draft feasibility study/EA for WBR does not address hazardous algae blooms [HAB], which would occur under the authorized use of stream purification. Wouldn't reallocation affect how USACE address HAB situations?
EIS General	Judith Marshall	I see nothing on the USACE website about possible decisions from cooperating agencies.
EIS General	Judith Marshall	Share what the safety ratings are for each of the dams and what those ratings mean.
EIS General	Judith Marshall	Disclose where hazardous materials were used in the construction of the WVS and how the public is protected from them.

Topic	Commenter	Comment
Authority	Judith Marshall	Public meeting poster boards showed navigation as being an authorized purpose but this is no longer the case according to the draft feasibility study/EA for the WBR. In addition to making this correction, I see USACE is pursing the EIS with all of the authorized project purposes. Will the project need be to meet these authorized purposes?
EIS General	Judith Marshall	What is the EIS baseline, as USACE is modifying it under the WBR?
EIS General	Birdshill Community Planning Organization/ Neighborhood Association	There has been zero time between WVSOM EIS project 'project scoping meeting' and termination of the public scoping period.
EIS General	Birdshill Community Planning Organization/ Neighborhood Association	Birdshill CPO/NA needs an accepted and authoritative source for Willamette River basin terminology. Preferably a source that can be shared among citizens, government entities, densifiers/developers, and taxpayers. Thereby, promoting both common language using accepted terms with images, and common good with understanding of terms and constraints.

Topic	Commenter	Comment
EIS General	Birdshill Community Planning Organization/ Neighborhood Association	R04: Develop a routine sequence chart (a 2D chart showing places of performance (who/whom/where) with the traditional steps in a process showing written procedures and regulations) to help expose defects. This both standardizes the process for ongoing O&M and convey understanding via road map of the process.
EIS General	Birds Hill Community Planning Organization/ Neighborhood Association	Coordinate WRB management with FEMA.
EIS General	Birds Hill Community Planning Organization/ Neighborhood Association	Government entities along Willamette River should not encourage or promote expensive and dense population development below Base Flood Elevations (BFEs) in the flood plain.
EIS General	Birds Hill Community Planning Organization/Neighborhood Association	Utilize GPS and plus codes for locales and provide multiple maps and map grid systems cross referenced to multiple policy sources from multiple jurisdictions for proper management of water and mitigation of flood impacts.

Topic	Commenter	Comment
EIS General	Birds Hill Community Planning Organization/Neighborhood Association	Engage document management consultants (including PDF document creation, administration, document archival and retrieval, compiling a thesaurus of terms and visual dictionaries, iconography/symbology, and developing infographics, fact sheets, and document summaries.
EIS General	Green Belt Land Trust	EIS should include discussion of Willamette Restoration Strategy vision and importance of regional collaboration to achieve that vision. Success can only occur with continued regional collaboration. USACE should evaluate how WVS operations can support creating a place where "basin residents can live in healthy watersheds with functioning floodplains and habitats supporting a diversity of native species." It is incumbent on USACE to balance competing interests while maintaining strong collaborative relationships with its partners.
Environmental Impacts	Marion County Board of Commissioners	Lower water levels at Detroit Lake throughout the summer could impact and effectively eliminate recreational use of the lake, which provides approximately 70% of jobs in the Detroit Lake area.

Topic	Commenter	Comment
EIS General	Marion County Board of Commissioners	USACE should improve hatchery practices at Minto Fish Hatchery in Mario County.
EIS General	Marion County Board of Commissioners	Consider Marion County economy's estimated $180 million/annual recreational and agricultural irrigation use on water in North Santiam watershed. USACE should take into account the role that recreation from lakes and streams in the North Santiam watershed provides to Marion County. Conduct studies projecting the economic and human impact of changes to management of WVS, including North Santiam watershed.
Environmental Impacts	Marion County Board of Commissioners	Radically adjusting water levels will increase the level of turbidity in North Santiam river downstream of the dams and create operational challenges for water supply systems.
Environmental Impacts	Marion County Board of Commissioners	Lowering seasonal water elevations in Detroit Reservoir and Big Cliff Reservoir could lead to higher temperatures in the North Santiam River. Deviations from normal water quality parameters could impact water treatment plant operations.
EIS General	Marion County Board of Commissioners	Marion County may need to seek legal alternatives if needs of local communities are not satisfied in EIS.

EIS General	Oregon Water Utility Council	Approximately 70 percent of the state's population is located in the Willamette Basin, and approximately 85 percent of the population in the Willamette Basin is supported by public water systems. These public water systems provide safe, reliable water supply for public health, safety and for business and industrial development activities. The ability of the water providers to meet the projected long-term water supply requirements of our communities is critical to the protection of public health and the economic viability of our state. WVP Storage is the last remaining water supply available to water suppliers. The stored water in the WVP constitutes the overwhelming majority of the remaining water supply available to public water providers in the Willamette Basin to meet future demands. Some existing water rights for municipal water supply downstream from the WVP reservoirs may become less reliable as a result of the impacts of climate change, reallocation of conservation storage for fish and wildlife benefits, and the subsequent issuance of water rights to protect stored water for instream purposes, or as a result of changes in the operation of the Willamette Valley System. Water providers in the Willamette Basin need access to reliable water supply to finance long-term

Topic	Commenter	Comment
		investments in infrastructure to protect public health and support economic growth. Storage space that is disproportionately subject to curtailment, interruptible, or "second-fill" status is unreliable year-to-year and over the long-term.
Environmental Impacts	Oregon Water Utility Council	Consider impacts of EIS proposed construction projects on stored water to protect public health, economic impacts of existing and future water supplies for public water providers, and impacts to existing public water systems' water supplies.

Topic	Commenter	Comment
Environmental Impacts	Oregon Farm Bureau	Oregon produces more than 225 products in the Willamette Valley making up 47% of Oregon's total agriculture sales with market value of more than $2.3 billion. The Oregon Farm Bureau has 3,084 members in the Willamette Valley. Members/industries potentially impacted by changes in operations and maintenance of the WVS include nursery and greenhouse industry, irrigation and water control districts, seed industry, dairy farmers, cattle industry, wheat growers, hazelnut industry and women in agriculture. We are very concerned about changes to the timing of when the Corps manages the System for flood control storage versus conservation storage. Our membership is both dependent on the winter flood control storage and the spring/summer conservation storage, and the correct balance between the two is critical.

Topic	Commenter	Comment
Alternatives	Oregon Farm Bureau	During the Willamette Reallocation process, we asked a number of questions about implementation of the Reallocation that the agencies involved in the process have been unable or unwilling to answer. These include basic questions around how the "share the pain" model for the Reallocation would work during times of shortage; how contracts would be administered, particularly between "new" users on the system and the existing agricultural contracts; whether users forced to covert from live flow to storage rights would be given a contract preference; how regulation downstream would occur; how the fisheries flows would be administered; and whether the fisheries flows are going to be subject to change as ESA consultations occur. To date, none of these questions have been answered. The answers to these questions have the potential to determine whether and to what extent changes proposed as alternatives in the Willamette Valley System review would impact agriculture in the basin.

Topic	Commenter	Comment
Authority	Oregon Farm Bureau	USACE needs to authorize and do channel maintenance in the rivers which are listed as navigable so they are navigable. Channel maintenance would address the serious problem of eroding banks due to gravel and debris that have blocked or partially blocked the main channel.
Alternatives	Oregon Farm Bureau	Strongly encourage the Corps to keep at the Congressionally authorized purposes of the System and evaluate alternatives that meet fisheries needs while protecting and promoting non-fisheries related uses of the system.
Alternatives	Oregon Farm Bureau	A storage capacity of 1.64 million-acre feet must be maintained during the same period as historic operations, and at the same level as historic operations. Maintenance of this storage capacity is particularly important in light of the proposed increased use of the System by a multitude of new users after the completion of the Willamette Reallocation. Agriculture needs both a larger share of the water available in the system and certainty that that amount of water will be available into the future.

Topic	Commenter	Comment
Environmental Impacts	Paul Mikesh	Pike Minnow prey on juvenile salmon and steelhead and need to be controlled in the WVS.
Environmental Impacts	Phillip Brozek	Recommend that flows for fish & wildlife and flows for Endangered Species are not strictly linked. BiOp demand will be the priority for fish & wildlife flows, but if in the future BiOp flows are reduced under law or species recovery, fish & wildlife flow will remain at the previous level (current to the time of the EIS).
Alternatives	Phillip Brozek	Use Forecast Based Reservoir Operations (FIRO) for flood storage management on a programmatic scale resulting in each reoperation study conducting an EA for any impacts beyond those disclosed in the EIS. Use of FIRO would involve conducting review and modification of the Water Control Diagram and possibly the Emergency Spillway Release Diagram for each reservoir.

Topic	Commenter	Comment
Mitigation	Phillip Brozek	Address Toxic Algae Management Plan and include monitoring, communication/notification, and mitigation. Mitigation may include closure of all or part of reservoirs affecting recreation, drinking supply, etc. Future mitigation may include treatment of a reservoir as the technology improves.
Environmental Impacts	Phillip Brozek	While there could be some overlap or synergistic effects, ecological flows should not be confused with flows required by the NOAA Fisheries BiOp. The inclusion of these environmental flows in Willamette Valley System operation is not contrary to project authorization as part of the authorized fish & wildlife objective. Ecologically sustainable flow is clearly within the scope and policy in the preparation of EIS alternatives. The EIS analysis should include the healthy inter-relationships of sediment, temperature, nutrient, and connectivity, along with healthy-river based socioeconomic benefits.
EIS General	Public Power Council	Corps should use this EIS as an opportunity to reset and influence USACE plans throughout the system (e.g. EA Cougar Dam and Detroit EIS) and to properly sequence the necessary processes and subsequent actions in the WVS.

Topic	Commenter	Comment
EIS General	Public Power Council	Work closely with BPA as cooperating agency to produce a thorough analysis of multi-operational effects on power generation. Consider hatchery production program goals and harvest management.
Alternatives	Public Power Council	Consider hatchery production program goals and harvest management as part of the EIS in order to understand their impacts and interplay with the resultant proposed action.
Mitigation	Public Power Council	EIS needs to include a clear effectiveness benchmark to assess if a mitigation action should be implemented. Providing a clear decision matrix and sharing it at all management levels within the Corps, as well as publicly, is necessary for success in the WVS.
Alternatives	Rich Domingue	Consider capping water delivery contracts at current levels and revising project operations to have a high probability of meeting contracts and downstream instream flow needs while minimizing conservation storage.

Topic	Commenter	Comment
Environmental Impact	Rich Domingue	Analyze each alternative for effects on each independent ESA-population's viability, WVP-wide effects on each affected evolutionary significant units (ESU) or distinct population segments (DPS), and effects on designated critical habitats for each listed species.
Environmental Impact	Rich Domingue	Concern that the quality and timing of discharges at the dams and the severe reduction or elimination of passage to and from historical spawning and rearing habitats upstream of the dams strongly contribute to both a long-term downward trend and a recent steep decline in the abundances of UWR Chinook salmon and steelhead.
Alternatives	Rich Domingue	Consider alternatives that include both expedited measures to aid in the survival of the ESA species in the near term, as well as longer-term measures for structural and operational changes that will provide longer-term solutions.
Alternatives	Rich Domingue	Consider creating off-channel storage or rechargeable well-fields using high winter flows to meet summer water demands in the Valley while prioritizing survival and recovery of ESA-listed fish.

Topic	Commenter	Comment
Alternatives	Rich Domingue	Evaluate flood damage reduction operations to determine if more moderate operations could provide the same flood and project protection as current operations with less severe impacts on streamflow and fish habitat.
EIS General	R. Foster	Is the old EIS available? Will the new EIS show the changes using Track Change? Will the public meeting presentation and presentation materials be accessed online?
Alternatives	R. Foster	Can the Corps provide real time, factual public information of CFS releases, alerting the public of release, volume, and share an estimate time of arrival? It may be good business practice to develop and use an early warning system for property owners, cities and state agencies (e.g. ODOT) which have to operate around and within these flooded areas and who will see direct negative impacts from CFS volume releases when there is time to warn all downstream property owners to they can prepare their animals, homes, and property and ODOT may be able to provide commuters what will occur where and when.

Topic	Commenter	Comment
Environmental Impacts	Ryan Thompson	Can USACE share any reports or background information that explain how the WVP economic estimates were calculated? If not, then can USACE answer specific questions about how those estimates were calculated?
EIS General	River Road Water Control Sub-District One	Flood management through dam releases has adverse impacts on old and weak revetments.
EIS General	Stauffer Farms	USACE should use the latest up to date technical tools to result in better management of the WVS. Using reliable current data and tools is critical to managing water resources that the basin citizens depend on for their needs.

Topic	Commenter	Comment
Environmental Impacts	Oregon Department of Transportation	USACE should coordinate with ODOT to avoid adverse impacts on intra- and inter- state highways that are located near WVS dams, flood control devices, reservoirs, and hatcheries from permanent impacts and construction related temporary impacts from the WVS Proposed Action and Selected Alternative. If traffic impacts are anticipated, a traffic impact study and cooperative agreements with mitigation may be warranted. Permits could also be required to accommodate oversized vehicles needed during construction. Any proposed action that would result in impacts or changes to ODOT bridges, culverts, or structures on the state highway system should be discussed with ODOT prior to making any decisions.
Alternatives	Doug Heiken	Consider adjusting WVS to conserve/restore freshwater mussels and macroinvertebrates. Lamprey conservation/restoration should be enhanced.
Alternatives	Doug Heiken	Remove revetments wherever possible to allow river dynamics. Remove weeds on banks and gravel barrier islands- manual removal and maybe using high flows.

Topic	Commenter	Comment
Environmental Impacts	Kristin Kessler	With global biodiversity decreasing, Willamette Valley needs to preserve native species.
Authority	Kristin Kessler	Endangered Species should take precedent over other missions in the WVS.
Alternatives	Kristin Kessler	Consider creative solutions for flood control to make radical changes that will also help endangered species such as reconstructing floodplain systems to increase flow and help ecological systems (like the Delta Ponds project in Eugene) or using native grasses for flood mitigation.
Alternatives	Eugene Yacht Club	Extend the usability of Fern Ridge Reservoir to operate in March and October.
Environmental Impacts	John Steele	Coordinate with ODFW to track nutrient flows into reservoirs using radioactive isotope tagging of fertilizer used by timber companies.
Alternatives	John Steele	Stop flow of mercury into Dorena and Cottage Grove reservoirs by limiting logging in areas of high mercury concentration within the soil substrate.

Topic	Commenter	Comment
EIS General	John Steele	USACE should fund educational science field trips at local schools, talk with school programs that have demonstrated success with improving fish habitat, and provide schools with aquariums to raise and release fish in local streams.
EIS General	John Steele	USACE has a credibility issue concerning meeting environmental standards for fish passage. How could Dorena Hydroelectric project be built ($24 million hydroelectric plant) without any fish passage improvements? Initially it was described as $9.3 million project and it ended up being $24 million without any fish passage. Builders complained that they could not afford the cost of adding fish passage but they had not legally acquired any contractual agreement with any profit or non-profit electrical company to purchase the produced power. So they ended up spending $870,000 to bury 6.5 mile underground power line to sell power to Pacific Power. USACE agreed to enter working agreement with builder/owner during construction to work out conflict through negotiations- did the owner/builder abuse this agreement or was relationship with owner/builder more important than working agreement with the people who live and work around Dorena Reservoir?

Topic	Commenter	Comment
Mitigation	John Steele	USACE should pay landowners to improve riparian habitat. For example- offer seminars on proper land management for fish habitat, pay for their attendance, offer financial incentives for efforts that enhance riparian habitat like tree planting. This could be monitored by drones and/or satellite mapping. Before and after pictures could be used to quantify and verify habitat improvements. Offer recognition awards to landowners that go the extra mile. This would probably cost less than $150,000 and would be well worth it.
Alternatives	John Steele	USACE should choose dams farther away from the ocean for mitigation projects- the further upstream, the more opportunities for fish to exploit nearby small streams and slack water areas as habitat, thereby increasing population density and diversity.
Alternatives	John Steele	Correct water temperature outflow from all dams starting with the most upstream locations.

Topic	Commenter	Comment
Environmental Impacts	John Steele	Optimal temperatures at dam outflows would have a domino effect on downstream dams because nearby streams would not be overshadowed by incorrect temperature regimes, thus preventing fish from not entering when temperatures are not within a specific range.
Alternatives	John Steele	USACE should coordinate with NOAA to track salmon migrating to the ocean to gather information about their habitat and food sources (what, where, when, and why). What are food sources of salmon while in the ocean? Concerned about supply of herring.
Alternatives	John Steele	Create a property acquisition endowment for USACE to purchase streamside property from timber companies, land owners, municipalities, etc. (specifically on the headwaters of major tributaries in the WV basin) by placing a 1% surcharge on habitat enhancements.

Topic	Commenter	Comment
EIS General	Network of Oregon Watershed Councils	USACE should work to limit upstream inputs that lead to toxic algae blooms in reservoirs, sediment overloads, and high water temperatures. Scoping document should include ways to monitor and treat water quality issues. Downstream issues mostly concern fish habitat- water quality and quantity can be impacted by how dams are managed and operated. Water temperature and sediment loads can also be impacted by USACE management plan.
EIS General	Network of Oregon Watershed Councils	Dams in WVS are artificial but necessary barriers to natural water shed system health. USACE should work with local councils on issues that impact water quality, water quantity, and fish and wildlife habitat upstream and downstream of WVS dams. There is a balance between USACE mission of flood control and Watershed Council's mission of protecting and restoring watershed health. In developing scoping and the EIS, USACE should work with the Willamette Watershed Councils as partners for input on the ongoing management of the dams.

Topic	Commenter	Comment
EIS General	Native Fish Society, et. al	Action agencies should view EIS as a meaningful opportunity to co-create with the public a future for the Willamette Basin that includes abundant wild fish, healthy rivers, and thriving local communities.
Alternatives	Native Fish Society, et. al	Drawdown analysis should include consideration of methods that address the diversity of life histories of juvenile emigration throughout the project reservoirs and dam structures and their corresponding biological needs. Consider drawdowns on more reservoirs to flush native, juvenile fish downstream rather than turbines.
Alternatives	Native Fish Society, et al.	USACE should remodel Operations and Maintenance Team Report and Configurations/Operations Plan alternatives and not be constrained by previous assumptions that USACE must maximize or fulfill authorized purposes except for flood control and the maintenance of human health and safety.

Topic	Commenter	Comment
Alternatives	Native Fish Society, et al.	USACE has several projects under NEPA and ESA consideration including Willamette Basin Review, Detroit Dam & Lake Downstream Passage Project, Cougar Dam & Reservoir Downstream Fish Passage Project. No ROD's have been completed, nor have any of the projects and associated operations commenced. …These projects should be incorporated as proposed alternatives, not as No Action alternatives. None of these projects are currently operational and it is incorrect to consider them otherwise for the purposes of evaluation under NEPA. Further, most, if not all, of these actions are not scheduled to be operational until after the completion of the system's EIS and corresponding Biological Opinion. USACE has a duty to adhere to the requirements of NEPA in completing the WVS analysis. Further, a properly executed analysis fulfills the Congressional intent and purpose of NEPA to provide the agencies and the public with the most complete understanding of the impacts of a proposed federal action.

Topic	Commenter	Comment
Alternatives	Native Fish Society et. al	USACE should analyze current and future costs of power production on the Willamette, as compared to other BPA project systems, along with evaluation of expected changes in electrical production and distribution in the region that could impact future power demand and generation. EIS should include considerations of BPA's precarious financial state when determining what funding will be available for future mitigation and restoration projects and whether BPA will continue operating the turbines in the long-term.
Alternatives	Native Fish Society et. al	Any hydropower infrastructure should be maintained on explicit schedules designed to result in the least interference to fish passage, water quality, water flows, and other recovery objectives.

Topic	Commenter	Comment
Environmental Impacts	Native Fish Society et. al	Climate change is expected to have significant impacts on the water resources available in the Willamette basin including changes in the type and timing of precipitation and increased water temperatures. Given these expected changes, providing access to high-quality, high-elevation habitats for aquatic species and ESA-listed fish is increasingly important. EIS impacts analysis should consider climate change scenarios utilizing most recent available science, assessing impacts of alternatives within the frame of anticipated climate change over the duration of the next WVS operations plan and BiOp. Evaluation should include climate change projection scenarios across the range of foreseeable possibilities from best case to worst case including expected outcomes if current trends continue.
Environmental Impacts	Native Fish Society et. al	EIS should assess how the reservoirs contribute to climate change through the production of greenhouse gases.

Topic	Commenter	Comment
Environmental Impacts	Native Fish Society, et. al	Use qualified experts and engage relevant Tribal nations to document, protect, or recover cultural resources. Evaluate how the action agencies will fulfill any outstanding requirements relating to the National Historic Preservation Act and assess the effects of proposed operations on properties on or eligible for inclusion on the National Register of Historic Places.
Environmental Impacts	Native Fish Society, et. al	Determine the full range of indirect, interrelated, and cumulative actions stemming from the operation and maintenance of all components of the WVS, including hatcheries, irrigation contracts, water delivery, etc.
Authority	Native Fish Society, et al.	USACE has the legal authority and management discretion to manage the WVS for the benefit of threatened fish where doing so does not impair flood control or the maintenance of human health and safety.

Topic	Commenter	Comment
Alternatives	Native Fish Society, et al.	NOAA identified critical actions in 2008 BiOp that USACE and action agencies must take to protect ESA-listed species and ensure recovery: 1) fish passage for adults and juveniles, 2) improved water temperatures and flows downstream of dams, 3) downstream habitat restoration, and 4) completed Hatchery Genetic Management Plan.
Alternatives	Native Fish Society, et al.	Action agencies should utilize WVS analysis and ESA consultation as opportunity to craft and execute roadmap to recovery for the Willamette Basin. Agencies should use best available science to evaluate the multitude of operational and infrastructural adjustments that could be made to improve the root causes of wild fish decline and loss of ecosystem function in the basin.
Alternatives	Native Fish Society, et al.	Proposed Action Alternatives should be designed and evaluated with flexibility in mind, and alternative measures should include robust timelines, metrics, and methods for evaluation.

Topic	Commenter	Comment
Alternatives	Native Fish Society, et al.	Concern about the complexity of juvenile collection facilities, like those currently proposed for Cougar and Detroit Dams, because they have to be designed for a wide range of reservoir surface water elevations and fluctuations in flows, makes these systems more difficult to engineer and install and increases the likelihood of failure.
Alternatives	Native Fish Society, et al.	Consider the following alternatives - drawdown analysis incorporating diversity of life histories/biological needs, lowering reservoir pool elevations to allow surface oriented fish to access passage outlets, and run-of-the-river operations - to extend the period for which the projects provide potential storage for flood control, which is crucial as climate change makes severe weather and flooding more unpredictable; however, the need to store water for flow augmentation and other uses during the summer and fall need to be taken into account.

Topic	Commenter	Comment
Alternatives	Native Fish Society, et al.	Evaluate infrastructural and operational alternatives for improving the timing of adult migration, reducing prespawn mortality, and increasing the number of adults that are successfully transported into habitats above WVS projects including temperature control operations and adult collection facilities operations. Consider specific temperature control operational changes specific to each dam site at the following dams: Cougar, Detroit, Hills Creek, Lookout Point, and Green Peter.
Alternatives	Native Fish Society, et al.	Evaluate upgrading adult collection, handling, and transport in the Middle Fork adult collection facility.
Alternatives	Native Fish Society, et al.	Evaluate measures to improve flows for the recovery and benefit of fish and wildlife and ensure flow targets are met, even in years of water shortage.

Topic	Commenter	Comment
Alternatives	Native Fish Society, et al.	EIS should include an alternative that would reconfigure pre and post flood damage reduction operation. In particular, the alternative should describe measures necessary to revise Project operating manuals to take greater advantage of forecasting services to minimize rates of attenuating and augmenting while maintaining the current control point flow objectives.
Alternatives	Native Fish Society, et al.	Evaluate methods to improve downstream rearing habitat to increase habitat suitability and diversity.
Alternatives	Native Fish Society, et al.	Monitor and evaluate the rates of hatchery fish spawning in the wild and have procedures in place to reduce straying if rates of percent hatchery origin spawners are exceeded. Ensure that hatchery programs adhere to Hatchery Genetic Management Plans to protect wild, ESA-listed fish from hatchery fish.

Topic	Commenter	Comment
Alternatives	Native Fish Society, et al.	Consider the following actions to support the recovery of ESA-listed fish in areas outside the four priority basins: 1) Conduct a basin-wide assessment to identify anchor habitats in non-priority basins and opportunities to correct smaller passage barriers to provide fish access to those reaches; 2) Fund and implement habitat restoration and improvement in undammed tributaries like the Molalla, Tualatin, Luckiamute, Calapooia, Pudding, Yamhill, Marys, and Coast Fork Willamette; 3) Consider special guidance for regulatory programs operated by the Corps and other action agencies, including removal-fill permitting, to mitigate for impacts of the dams on listed fish.
Alternatives	Native Fish Society, et al.	Consider how addressing deferred maintenance may assist with fish recovery efforts including addressing "red tag" or in operational RO's and other outlets.
Environmental Impacts	Native Fish Society, et al.	EIS should consider how reservoirs and dam operations contribute to illegal poaching of ESA-listed fish.
EIS General	Native Fish Society, et al.	Expand Purpose and Need of EIS to include recovery of ESA-listed fish.

Topic	Commenter	Comment
Environmental Impacts	Native Fish Society, et. al	Consider how future flood control needs will be impacted by the 2016 NMFS biological opinion regarding FEMA's Oregon flood insurance program.
Alternatives	Native Fish Society, et. al	EIS should include ongoing Willamette Basin Review and proposed storage water reallocation as a proposed alternative, not as ongoing or no action alternative.

Topic	Commenter	Comment
Alternatives	Native Fish Society et. al	Water quality in the downstream reaches is impacted by current project operations. Water temperature and dissolved gas levels are particularly problematic for ESA- listed fish at numerous life stages including egg incubation, emergence, rearing, and adult returns. The following alternatives to improve water quality should be evaluated and include: 1) Reduce water temperatures below Lookout Point and Detroit dams in fall and winter by using the lowest ROs to discharge colder water during drawdown operations. 2) Improve water temperatures downstream of WVS projects in spring to improve adult migration to fish collection facilities. 3) Reduce total dissolved gas at projects where it exceeds NOAA Fisheries Criteria. Evaluate the use of a "flip lip" at Big Cliff Dam. 4) Adopt and strictly follow maintenance schedules and emergency protocols provided by NMFS and ODFW to reduce water quality impacts during such events.

Topic	Commenter	Comment
EIS General	Confederated Tribes and Bands of the Yakama Nation	Promises guaranteed under 1855 Treaty with the Yakamas (12 Stat. 951) include reserved rights within the Willamette Valley. Yakama Nation is concerned that proposals developed through any EIS may interfere with Yakama Nation's Treaty reserved rights falling within Yakama Nation's usual and accustomed areas. Due to the importance of the activities being evaluated, Yakama Nation requests meaningful technical level engagement with USACE during the NEPA process and development of the EIS.
EIS General	Jean Public	USACE is anti-environmental, I would prefer no-action, this work is not needed.

Topic	Commenter	Comment
EIS General	Yamhill Soil and Water Conservation District	Floods in 1996, 1997, 1998 and April 2019 have caused significant river scouring, loss of bank protection, and massive amounts of debris logged in this area. Access road to farmland and adjacent areas are in jeopardy of being lost in the next flood. It is evident that future river flood events will create a new channel, possibly a main channel across the May's land on Lambert Road. When this occurs, the river will endanger the downstream mining pits and area resulting in river capture and head cutting upstream. Approval of mining operations in the Willamette Valley floodplains of Yamhill County weakens the structure integrity of the floodplains, resulting in head cutting and eventual river capture destroying productive, high value farmland that Yamhill County depends on to support its economy.
Environmental Impacts	Junction City Water Control District	Many agricultural lands within JCWCD maintain individual groundwater wells that are directly affected by river levels and stream flows. Any changes to WVS must take into account subsequent effects on agricultural wells that are located along the entire length of the system.

Topic	Commenter	Comment
EIS General	Diana Olsen	Need look at impact of raw sewage and other pollutants in our rivers that has caused the decline of fish.
EIS General	Private Citizen	Concern about floodplain conceptual full plan. Useful to include visual dictionary, terminology, thesaurus on terms, context in which terms exist and describe location in basin to neighborhood.
Alternatives	Private Citizen	USACE should look for opportunities to increase the frequency and duration of inundation of floodplains and side channels to provide refugia and foraging habitat for native fish, including ESA listed species.
Alternatives	Troy Brandt	Establish a funding program to support habitat conservation, land trust support for purchasing conservation properties, and replacing river training infrastructure that limits river-floodplain connectivity. River corridor should be prioritized for purchase as habitat will continue to be converted for agriculture and residential, commercial, and municipal development. Existing developed properties in key locations could be restored to enhance habitat and reduce flood risk to other properties.

Topic	Commenter	Comment
Alternatives	Troy Brandt	Manage winter/early spring releases to increase river-floodplain connectivity.
Alternatives	Troy Brandt	Develop a cost share program to repair and replace stone revetments on the Willamette River and tributaries. As revetments age and fail, landowners are likely to rebuild revetments with stone. Repairs offer an opportunity to enhance river channel, bank, and upland habitats with bioengineering. Providing a cost share program would improve habitat conditions and river corridor functions. The program could also support revetment modifications to increase river-floodplain connectivity. Examples include removing/replacing undersized drainage culverts, removing relict revetments, and reconnecting blocked side channels and other floodplain habitats.

Topic	Commenter	Comment
Alternatives	Middle Fork Willamette Watershed Council	Flows in the Middle Fork Willamette are severely depleted from historic conditions in order to meet congressionally approved rule curves. The rule curve scenarios are dated and pose not only a risk to aquatic ecosystem health and recover, but also may pose a risk to human populations. The effects of climate change and future precipitation scenarios should be considered for flood risk mitigation as well as effects on fish species life stages and the creation and maintenance of dynamic aquatic habitats.
Alternatives	Middle Fork Willamette Watershed Council	Existing revetments/levees in the Middle Fork Willamette prevent access to, and function of, floodplain habitats. Additionally, we suggest a streamlined 408 process. In some cases, decommissioning levees could result in a positive benefit for both endangered species through habitat creation and downstream communities through flood-risk mitigation.
Alternatives	Nathan Warren	Consider developing a whitewater feature either along the Willamette River in the Eugene/Springfield area, or along the canoe channel that runs through Alton Baker Park.

Topic	Commenter	Comment
Environmental Impacts	Willamette Kayak and Canoe Club	Man-made debris upstream of the current I-5 freeway bridge over the Willamette creates a navigation and recreational hazard for river uses are a popular section of the river in the Eugene/Springfield area. It is also an ecological disruption interrupting the natural flow of the river. Cost of remediation and mitigation would be inexpensive since it involves removal rather than installations of man-made materials. This hazard is blatant, dangerous and conspicuous in regard to current management practices.
Alternatives	Clinton Begley	Consider the addition of recreation amenities for whitewater paddlers that would include the construction of additional features in the Long Tom channel that would accommodate use at a wider range of flows.
EIS General	John Zielinski	Will the TMDL be part of EIS? Agricultural land has increased flooding which could mean increased mercury deposits. With a changing climate, the need for water is increasing. Water allocation for agriculture should be higher. Bank erosion is also an issue for farmers with property bordering the Willamette River.

Topic	Commenter	Comment
Alternatives	Steve Caldwell	USACE allows too much water during the winter and spring months to spill out of the dam. If the water is cold, algae is less active, if there is a full reservoir the dilution of an algae bloom is greater. The rules that require the Corps to dump water need to be changed to support human health, fiscal responsibility and store more water behind the Detroit dam. The proposed project costs too much money and will in the end result in more damage to the regional environment.
EIS General	Eugene Water and Electric Board	Project induced reductions in river level below both the Leaburg Dam and Walterville Diversion are limited to 2 inches per hour year round. As such, O&M of WVS directly affects EWEB's downstream project. EWEB's Hayden Bridge Filtration Plant is located downstream of Cougar and Blue River projects. O&M of these projects has the potential to affect downstream water quality. For example, reservoir management can influence cyanobacteria blooms and reservoir drawdowns can result in increased turbidity in the McKenzie River downstream of the projects.

Topic	Commenter	Comment
EIS General	Eugene Water and Electric Board	Improving coordination and communication by USACE with stakeholders regarding fish enhancement projects/operational changes could help identify opportunities for stakeholders to work more collaboratively on identifying and implementing solutions.
Alternatives	County Heritage Farms	It would be an advantage if the Rule Curve law was amended to allow reliable use of local real time data to assist USACE to fine tune management decisions regarding storage and downstream releases. This would help in situations where flows and flow conditions do not match long term averages. Having management flexibility will be important in the future with climate change causing fluctuations in weather patterns.
Environmental Impacts	Private Citizen	Concern with streamside growth of vegetation along the Salt Creek (Yamhill) instream dams with flooding in winter and dry in summer.