



To: Nicklas Knudson, Project Manager
U.S. Army Corps of Engineers

From: Stephen P. Maher, SW Regional Director
Oregon Chapter, Backcountry Hunters and Anglers (ORBHA)

Date: 14 February 2023

Subject: ORBHA Comments on USACE's Willamette Valley System Draft PEIS

Dear Mr. Knudson,

My name is Stephen Maher. I am an architect, and angler, and a Southwest Regional Director for the Oregon Chapter of Backcountry Hunters and Anglers (ORBHA). On behalf of the board and our members, thank you for the opportunity to review and comment on the *Draft Programmatic Environmental Impact Statement for the Willamette Valley System Operations & Maintenance*. We hope you will consider the following comments.

- The Upper Willamette Basin Chinook salmon, winter-run steelhead, and bull trout populations have been hit hard over the last century—particularly over the last few decades. Populations in some tributaries have become virtually extinct. A sizable share of that reduction can be attributed to dams that cut off access to significant spawning habitat. The Corps is in a unique position to address this specific barrier with modifications to its dams that will allow effective upstream and downstream fish passage. We are encouraged that the Corps is now proposing meaningful changes in operations that should be a real benefit towards population recoveries.
- The PEIS timelines for completion of the projects—and the beginning of fish passage—seem to be quite long considering the urgency of the issues (20 or more years, in some cases). If current trends continue, the fish that these projects are intended to help may well be gone. Furthermore, funding for the projects will be linked to the timelines. In other words, longer timelines will likely lead to delayed funding. The ORBHA urges the Corps to reduce these times as much as reasonably possible to successfully complete the projects.
- Given the breadth of the PEIS scope, it is understood that some projects will need to be prioritized. ORBHA strongly encourages the Corps to prioritize the projects targeting the severely declining winter steelhead population. Completion of the work at Cougar Dam is another worthwhile endeavor. As documented in the latest NOAA Fisheries 5-Year assessment of threatened fish species in the Upper Willamette Basin (2016), only the McKenzie River Chinook salmon population remains large enough and genetically stable enough to be considered a healthy population.
 - Specifically regarding Cougar Dam: there remains potential for sediment release into the McKenzie River. ORBHA supports Alternative 5. If this option is selected, we urge the Corps to take all prudent steps to minimize the impact of released sediment into the mainstem McKenzie River.

Thank you for all the work you do for our fisheries and for considering our comments on the Draft PEIS.

Sincerely,

Stephen P. Maher