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MARION COUNTY BOARD OF COMMISSIONERS

June 22, 2026

Colonel Larry Caswell, Jr.
District Commander
U.S. Army Corps of Engineers, Portland District
333 SW 1st Avenue
Portland, OR 97204

Dear Colonel Caswell, Jr.:

On behalf of the undersigned local governments, public agencies, and community stakeholders, we write to express our serious concerns regarding the proposed late fall/early winter 2026 deep drawdown of Detroit Reservoir analyzed in the Final Supplemental Environmental Impact Statement (“SEIS”) for the Willamette Valley System Operations and Maintenance project. We ask you to cancel any deep drawdown or draining of Detroit Lake in 2026 and reevaluate future plans after you have all the relevant data.

Our communities support science-based efforts to improve fish passage and recover ESA-listed species. However, the Corps’ own SEIS identifies potentially significant adverse impacts associated with the proposed Detroit Reservoir drawdown, including increased turbidity and downstream sediment transport, impacts to drinking water operations and water supply reliability, recreation losses, and significant effects on resident fisheries, including kokanee and rainbow trout. The SEIS specifically acknowledges that the deep drawdown at Detroit Reservoir is expected to “adversely affect water supply, water quality, drinking water (facility operation), and recreation,” and further states that the effects on fish are “mixed.”¹ The SEIS also recognizes that drawdown operations could result in “significant reductions in abundance” for resident fish species, including kokanee and trout, and acknowledges that dry-year conditions may prevent reservoir refill to normal summer elevations.²

These risks are particularly significant for Marion County communities and downstream water users that rely on the North Santiam River and Detroit Reservoir for drinking water, recreation, tourism, irrigation support, and regional economic stability. While the SEIS acknowledges substantial operational and environmental risks associated with a deep drawdown, it does not provide sufficient quantitative analysis, enforceable operational thresholds, or clearly defined mitigation measures demonstrating that those risks can be effectively managed under drought and low-flow conditions. Communities throughout the region remain concerned that downstream

¹ Willamette Valley System Operations and Maintenance Final Supplemental Environmental Impact Statement, Executive Summary § 7.2.2, ES-8 to ES-9 (May 2026).

² Id. at ES-10

drinking water systems, recreation economies, and resident fisheries could experience significant impacts without adequate safeguards or response mechanisms in place.

Recent experience elsewhere in the Willamette Basin underscores the seriousness of these concerns. Similar drawdowns at Green Peter and Lookout Point reservoirs produced prolonged periods of elevated turbidity that strained downstream drinking water systems and resulted in significant costs to local communities. Municipal water providers serving the North Santiam basin have warned that a deep drawdown at Detroit Reservoir could mobilize sediment and turbidity levels sufficient to overwhelm existing treatment capacity absent substantial infrastructure upgrades. At the same time, communities in the North Santiam Canyon—many of which continue rebuilding from the 2020 wildfires—remain heavily dependent on recreation and tourism tied to Detroit Lake. The potential for delayed reservoir refill and prolonged low-water conditions threatens recreation access, local businesses, and the long-term viability of resident fisheries, including the kokanee fishery that serves as a major economic driver for the region. By and large, these impacts would ultimately be borne by local governments, ratepayers, water providers, and small businesses rather than the federal government.

We are especially concerned about uncertainty surrounding reservoir refill and long-term water availability given current drought conditions and below-average snowpack levels throughout much of Oregon that illustrate the growing hydrologic risks facing the region.³ This year provides a clear example of the vulnerability of Detroit Reservoir to refill challenges following the release of substantial stored water during a deep drawdown. The SEIS itself acknowledges that “[i]n very dry winters, USACE may not be able to refill the reservoir to minimum conservation pool by February 1, which could result in a lower reservoir level than currently experienced in very dry years.”⁴ If winter precipitation and spring inflows are insufficient following a deep drawdown, the reservoir may not recover to normal conservation pool elevations, placing additional strain on drinking water systems, recreation economies, fish habitat, irrigation support, and other authorized project purposes.

We are also concerned that the SEIS does not demonstrate that prior drawdown operations have produced measurable, biologically meaningful improvements in fish passage or species recovery sufficient to justify the substantial risks identified throughout the document. Before proceeding, the Corps should first demonstrate through empirical monitoring and performance data that similar operations have effectively improved downstream fish passage and materially advanced recovery objectives for ESA-listed species in the Willamette Valley. Those demonstrations have not occurred, so a deep drawdown or draining in 2026 is entirely unwarranted.

In addition, Congress recently directed the Corps to complete a dedicated turbidity study for drawdowns within the Willamette Valley System through the Thomas R. Carper Water Resources Development Act of 2024, P.L. 118-272. That report was specifically intended to evaluate instances of high turbidity associated with prior drawdowns, summarize monitoring

³ U.S. Army Corps of Engineers, *Willamette Valley reservoirs face drought, Army Corps to discuss at public meetings* (May 12, 2026), <https://www.nwp.usace.army.mil/Media/News-Releases/Article/4484427/willamette-valley-reservoirs-face-drought-army-corps-to-discuss-at-public-meeti>

⁴ Willamette Valley System Operations and Maintenance Final Supplemental Environmental Impact Statement, Executive Summary § 7.2.2, ES-9 (May 2026).

data, identify lessons learned, and assess opportunities to minimize impacts on non-federal entities and municipal drinking water systems. Given the significance of the concerns already acknowledged in the SEIS, proceeding with a full deep drawdown before completion and public evaluation of this congressionally mandated report would be premature. The Corps should not make an irreversible operational decision regarding deep drawdowns before the information Congress specifically directed it to collect is available to decision-makers and the public.

Considering these acknowledged risks and uncertainties, we are concerned that the significant risks identified throughout the SEIS outweigh the anticipated benefits of the proposed operation. Based on the information currently available, the undersigned jurisdictions do not support implementation of a deep drawdown at Detroit Reservoir. We strongly urge the Corps to refrain from authorizing any deep drawdown in 2026. The Corps should not proceed with any drawdown after 2026 unless and until it can demonstrate, through completed studies, empirical monitoring data, and clearly defined performance metrics, that the operation can be conducted without unacceptable impacts to drinking water systems, water quality, recreation, local economies, and resident fisheries, and that similar drawdowns have produced measurable improvements in fish passage and species recovery. Accordingly, we respectfully request that the Record of Decision not authorize progression to a deep drawdown and that the Corps reevaluate the following before revisiting any deep drawdown or draining plans:

1. Complete the turbidity report required by the Thomas R. Carper Water Resources Development Act of 2024, P.L. 118-272, and conduct additional quantitative analysis of sediment transport, turbidity duration, reservoir refill probability, municipal drinking water treatment impacts, recreation access impacts, and effects on kokanee and resident fisheries.
2. Establish clear, enforceable adaptive management triggers requiring modification, suspension, or termination of any drawdown operations if turbidity levels, drinking water treatment impacts, drought or refill conditions, recreation access impacts, or fishery impacts exceed defined thresholds.
3. Demonstrate, using empirical monitoring data from prior Willamette Basin drawdowns and any phased Detroit Reservoir operations, that the anticipated fish-passage benefits are being achieved and are sufficient to justify the documented impacts to drinking water systems, recreation, and resident fisheries before authorizing progression to the proposed drawdown level.
4. Consult directly with downstream drinking water providers, local governments, emergency managers, and affected communities before implementation to ensure operational coordination, public communication protocols, and emergency response measures are fully established.
5. Identify and commit mitigation funding and response mechanisms in advance for impacts to drinking water systems, local businesses, recreation access, and resident fisheries resulting from drawdown operations.

The undersigned jurisdictions support science-based fish recovery efforts. This request is intended to ensure that the Corps proceeds in a measured, transparent, and scientifically defensible manner before implementing an operation that the SEIS itself acknowledges may adversely affect communities throughout the North Santiam watershed.

We urge the Corps to incorporate these conditions into the Record of Decision and refrain from authorizing any deep drawdown in 2026 so that there is sufficient time to complete the necessary analysis, monitoring, operational thresholds, demonstrated biological effectiveness, and mitigation commitments before taking any further action.

Thank you for your consideration and continued engagement with our communities.

Sincerely,

MARION COUNTY

Colm Willis, Commission Chair
Kevin Cameron, Commission Vice Chair
Danielle Bethell, Commissioner

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Steve Sims, Council President
David Patty, Councilor
Jordan Ohrt, Councilor
Len Hays, Councilor
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Lucas and Carly Lunski, Marina Owners
Scott and Callie Lunski, Marina Owners

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NORTH MARION TOURISM COLLABORATIVE

cc:

The Honorable Ron Wyden, United States Senator

The Honorable Jeff Merkley, United States Senator

The Honorable Andrea Salinas, United States Representative

The Honorable Janelle Bynum, United States Representative

The Honorable Tina Kotek, Governor of Oregon

Oregon Health Authority, Drinking Water Services

Oregon Department of Environmental Quality