



April 1, 2025

Michael Neal
U.S. Army Corps of Engineers Regulatory Branch
P.O. Box 2946
Portland, Oregon 97208-2946

(submitted via email)

RE: USACE No.: NWP-2024-415

Dear Michael,

On behalf of the Board and staff of McKenzie River Trust, I submit these comments on the Permit Application referenced above, the Eugene Water and Electric Board (EWEB) proposal to construct a water withdrawal and treatment facility on the banks of the Willamette River.

We appreciate EWEB's attempt to mitigate the impacts of this proposed construction project on existing mapped wetlands, the riparian zone, and the river itself beneath the Ordinary High Water mark. What has been proposed appears well-researched and to be consistent with common best practice. We appreciate the extent of the planning work that has been coordinated with David Evans and Associates, a firm that knows the mitigation process and knows the river well. We have no concerns about the proposed mitigation or with the underlying work being proposed to construct and operate the source water facility.

Perhaps more importantly, we are excited at the prospect of EWEB extending its watershed conservation efforts into the Coast Fork and Middle Fork of the Willamette River, which converge approximately one mile upstream of the project site. Since the first mention of the new source water facility years ago, we have discussed with EWEB staff, Commissioners, and other community partners the opportunity to expand and adapt the partnership that has invested in the health of the McKenzie Watershed (where EWEB's primary source water facility is currently) to the Middle and Coast Forks of the Willamette. That partnership in the McKenzie has contributed to a wide range of community benefits:

- Acquiring floodplain land for long term conservation
- Providing financial incentives and tech support for watershed stewardship to agricultural producers and residents
- Removing post-wildfire hazardous materials from the watershed
- Restoring floodplain connectivity and complexity on more than 400 acres of floodplain, with plans to expand this work to more than 1,700 acres over the next decade
- Establishing and maintaining a water quality monitoring system
- Establishing and maintaining an emergency hazardous spills response program
- Supporting K-12 and higher education watershed learning opportunities and research

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EWEB has been a core member of the overlapping partnerships driving all of these efforts. Their financial support, technical expertise, and willingness to experiment have all provided tremendous leverage for organizations working towards land and water conservation. This is to be expected for a utility that draws upon the McKenzie River for its core mission. We know that EWEB will be similarly driven to maintain and improve watershed conditions in the Coast and Middle Forks of the Willamette River, given their vested interest in the health of the new water supply.

The placement of hardened infrastructure in a river or its floodplain should always be undertaken with great care, a healthy dose of humility, and with a commitment to the health of the larger watershed. The need for secondary or redundant water intakes and treatment for the Eugene-Springfield is clear. The site EWEB has chosen on the Willamette River appears to be well suited for such a facility. They seem to have proposed adequate mitigation for the site impacts. We look forward to working with EWEB and many community and watershed partners, including the US Army Corps of Engineers, to ensure that we give back far more to the watershed than we ask of it at that site. Given the opportunities to expand all aspects of source water conservation into the Coast and Middle Forks of the Willamette River, we are encouraged to know that EWEB will continue to be a core partner in these efforts.

Please contact me if you have further questions about that collaborative work or about this letter of support for the project at hand.

Best wishes,

A handwritten signature in blue ink that reads "Joe Moll". The signature is fluid and cursive, with the first name "Joe" and last name "Moll" clearly distinguishable.

Joe Moll
Executive Director