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Oregon Health Authority
Drinking Water Services
800 NE Oregon Street, Suite 640
Portland, OR 97232

US Army Corps of Engineers
Portland District
211 E. 7th Avenue, Suite 480
Eugene, OR 97401

November 21, 2024

RE: Request for Halt to Green Peter Reservoir Drawdown to Protect Municipal Water Supply

On behalf of the City of Sweet Home, I am writing to formally request that the Oregon Health Authority (OHA) intervene to halt the Green Peter Reservoir drawdown. The United States Army Corps of Engineers' ("USACE") drawdown operations at Green Peter Dam are posing a serious risk to Sweet Home's municipal water treatment infrastructure. USACE's drawdown operations are negatively impacting the reliability of our community's drinking water supply. And, all of this could likely be avoided if the USACE's drawdown operations complied with the all applicable water quality standards, which prohibit the level of turbidity caused by this drawdown.

USACE was ordered to implement deep reservoir drawdowns at Green Peter Dam pursuant to an interim injunction in *Northwest Environmental Defense Center, et al. v. U.S. Army Corps of Engineer, et al.*, Case No: 3:18-cv-00437-HZ. On September 24, 2024, the Court issued an order in that litigation adopting USACE's Revised Green Peter Dam Fall Drawdown Fish Passage Implementation Plan (USACE's drawdown plan). (ECF 320). USACE's drawdown plan requires that "[t]he injunction plan will be paused or terminated if downstream drinking water facilities are unable to meet water supply demands or if a public health emergency is declared[.]" (ECF 320-1 at 9.)

This letter is Sweet Home's notice to OHA that the drawdown has caused a public health emergency which is significantly impacting Sweet Home's ability to meet water supply demands.

Recent Incident and System Impacts

The Sweet Home Water Treatment Plant recently experienced a mechanical failure in one of its three primary water filters. This failure occurred during the drawdown, coinciding with heightened sediment and turbidity levels in the South Santiam River downstream of the drawdown. These conditions, compounded by the increased reliance on polymers to manage increased sediment loads caused by the drawdown, caused a clog or pressure buildup in the filter system. The clog caused a system malfunction.

This incident is not an isolated problem. The drawdown has significantly increased operational strain on our water treatment plant, forcing adjustments and great difficulty in trying to maintain water quality standards. While the other two filters remain operational, our capacity to fill reservoirs has been materially reduced. If another filter fails with continued turbidity from the drawdown, the consequences will escalate rapidly and will jeopardize our ability to meet the

community's water needs.

Prevention Over Reaction

Taking precautionary action now—by halting the drawdown—will allow time to evaluate these issues fully and prevent a larger crisis. The City of Sweet Home, like other downstream communities, is already under significant pressure to mitigate the operational challenges caused by this drawdown.

Public Health and Safety Risks

Residents expect their municipal water supply to remain safe and reliable. If additional strain or failures occur, the repercussions could include City regulatory violations, interruptions in water availability, significant public health risks, and damage to public confidence in the reliability of our systems.

Supporting Regional Efforts

The City of Lebanon has also raised serious concerns about the impact of the drawdown on their water infrastructure, highlighting that this is a regional issue affecting multiple communities. Together, our shared experiences point to an urgent need for a coordinated and precautionary approach to prevent further harm.

Request for Action

We respectfully request that the Oregon Health Authority direct a halt to the Green Peter Reservoir drawdown to allow time for a thorough investigation of infrastructure issues experienced by impacted cities, including Sweet Home and Lebanon. With the challenges caused by the drawdown and its impact on our water treatment infrastructure, Sweet Home declared a State of Emergency on October 8, 2024, underscoring the seriousness of this situation.¹ Our water treatment plant is an essential component of Sweet Home's ability to provide safe drinking water to our residents. With one filter already offline, the strain on our system underscores the urgency of addressing these issues. Taking a proactive approach now will help prevent more significant challenges in the future.

The purpose of this drawdown cannot come at the expense of public health or the reliability of municipal water supplies. A halt to the drawdown is a necessary step to safeguard the well-being of the communities affected.

Thank you for your attention to this critical matter. We appreciate your efforts to protect the health and safety of our community and ensure the reliability of our municipal water systems.

Sincerely,



Jason Ogden
Police Chief and Interim City Manager
City of Sweet Home

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¹https://www.sweethomeor.gov/sites/default/files/fileattachments/ordinance/26425/res._no._24_for_2024_-_2024-24_-_green_peter_drawdown_state_of_emergency.pdf