

WATERWATCH OF OREGON \* STEAMBOATERS \* THE NORTH UMPQUA FOUNDATION  
UMPQUA WATERSHEDS \* UMPQUA VALLEY FLY FISHERS \* NATIVE FISH SOCIETY  
SOUTH UMPQUA RURAL COMMUNITY PARTNERSHIP \* PACIFIC RIVERS  
NORTHWEST GUIDES AND ANGLERS ASSOCIATION \* ROGUE FLYFISHERS  
PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS \* OREGON WILD  
INSTITUTE FOR FISHERIES RESOURCES \* AMERICAN WHITEWATER  
THE CONSERVATION ANGLER \* CASCADIA WILDLANDS \* MCKENZIE FLYFISHERS  
OREGON COUNCIL FLY FISHERS INTERNATIONAL

The Honorable Kate Brown  
Office of the Governor  
900 Court Street, Suite 254  
Salem, OR 97301-4047

The Honorable Jeff Golden  
Oregon State Senate  
900 Court St. NE, S-421  
Salem, Oregon 97301

The Honorable Floyd Prozanski  
Oregon State Senate  
900 Court St. NE, S-413  
Salem, Oregon 97301

Tom Byler, Director  
Oregon Water Resources Department  
725 Summer Street NE, Suite A  
Salem, OR 97301

*Sent Via Email*

October 16, 2020

**Re: Public Safety and Emergency Preparedness at Winchester Dam**

Dear Governor Brown, Senator Golden, Senator Prozanski, and Director Byler:

We hope you and yours are safe and well in these difficult times.

We are writing to respectfully ask you to address a critical public safety issue at Winchester Dam on the North Umpqua River. Specifically, we ask that the Oregon Water Resources Department (OWRD) exercise its authority under ORS 540.482 and ORS 540.995 to require Winchester Water Control District (WWCD) – the private owners of this 130-year-old dam – to bring the dam's Emergency Action Plan (EAP) into compliance with statute as soon as possible. Further, we ask that state officials notify the relevant local government, search

and rescue, and other emergency response authorities in the vicinity of the dam that the potential for increased confusion and harm may exist during a dam failure emergency due to the current lack of an EAP meeting statutory requirements. Finally, we ask state officials to assist local authorities in preparing to compensate for the increased risk to people, property, and first responders until WWCD has a new EAP in place.

Members of our organizations, our families, our neighbors, and our friends live and/or recreate in the river below this dam, or depend upon the salmon resources from this river for their livelihoods. As you may know, OWRD's dam safety officials have long categorized Winchester Dam as "high hazard," primarily due to likely loss of life in the case of dam failure among the people who frequent the river, parks, and boat ramps just downstream. Following an inspection in October 2019, OWRD downgraded Winchester Dam's condition to "poor," requested that WWCD hire an engineer to comprehensively inspect its structure, and warned the owners to address known dam safety issues soon. Winchester Dam has not received a comprehensive structural inspection since 1987. The dam's current EAP also dates to 1987 because WWCD has rebuffed repeated written requests by OWRD to update this EAP as required by statute.

Our understanding is WWCD has secured the services of a qualified engineer to conduct the requested dam inspection. A comprehensive repair informed by this inspection is expected in late summer or fall of next year. However, we are not aware of plans by WWCD to generate a new EAP.

There may be an increased risk of a failure at Winchester Dam in the near term due to recent catastrophic fire in the North Umpqua combined with a La Niña climate pattern forecast for Oregon this winter. We believe generating a statutorily required EAP for Winchester Dam as soon as possible is critical to reduce the risk of harm or death to people, public infrastructure, and property below the dam in the near term. Acting now would have the added benefit of notification of local elected and public safety officials that there is a high hazard dam in poor condition in their area and that they must take steps to prepare based upon the best information available.

Prior to writing this letter, the undersigned groups reviewed apparent deficiencies in the current Winchester Dam EAP.<sup>1</sup> These include:

- Page 2 states that "immediate activation of the EAP, as soon as the dam failure is observed and reported is extremely important to initiate search and rescue for any individuals who may be affected by dam failure." However, other sections of the EAP make clear that a quickly observed and reported dam failure depends in large part on the presence of briefed and trained personnel who no longer exist or have a greatly reduced presence near the dam compared to 1987. In order of relative importance within the EAP, these include the "hydropower plant operator" (which no longer exists), Oregon Department of Fish and Wildlife (ODFW) personnel presence in the fish counting station (which have been reduced, all counts being

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<sup>1</sup> PDF scan of EAP available here: <https://bit.ly/3k6Yb2c>

conducted by video camera since 1991), City of Roseburg water intake plant workers, and "visitors" (which have been reduced due to pandemic-related closure of the fish ladder viewing area). As noted elsewhere in this letter, because the EAP has not been updated and/or implemented regularly since 1987, it is not clear that City of Roseburg water plant staff and/or ODFW staff have been briefed or trained to prepare for the role of first observers/reporters implementing an EAP during the failure of this high hazard dam. City of Roseburg staff may not be aware that they are 50 feet downstream of a designated high hazard dam currently in poor condition. These personnel should be notified and briefed as soon as possible.

- The EAP requires the emergency dispatch center to contact the "Dam Operator" who then must contact ODFW and the dam owner, Winchester Water Control District. The dam operator (which we understand to be the hydropower plant operator) no longer exists.
- The EAP listings for current "dam owner" WWCD board members are decades out of date.
- The highest natural resource priority in the immediate wake of a breach after protecting public drinking water supplies will likely be lamprey salvage, which is a species of significant focus for local and regional Native American Tribes. Tribal governments may also be concerned about exposure of cultural artifacts on site, among other issues. However, there is no mention of notice to Tribes in the current EAP. Tribes should be included in the new EAP, and notified and briefed on the current situation as soon as possible.
- The EAP throughout relies on telephone listings that do not reflect the Douglas County change from a 503 area code to a 541 area code in 1996.
- The EAP lists the current River's Edge Mobile & RV Park as its predecessor "Winchester Village Mobile Home Park."
- The "Dam Break Analysis" of potential for failure relies in large part on a 1976 U.S. Army Corps analysis (pp. 20, 22) and incorrectly states that the dam is "low hazard" (p. 20).
- The EAP states on p. 24: "The best means to prevent failure at this dam is by testing of the tie rods by physical testing." OWRD has stated that tie rod testing has not occurred since 1987.
- EAP effectiveness relies on annual briefing/training for the "Dam Operator" (p. 28) who no longer exists. On the same page, the EAP calls for annual updates of the plan and annual emergency simulations. OWRD officials have stated that the EAP has not been updated since 1987, and we have been unable to find any documents or information indicating emergency simulations have been conducted since 1987.
- Although it is outside of the modeled inundation zone, the Umpqua Basin Water Association (UBWA) water intake is particularly sensitive infrastructure downstream from Winchester Dam. UBWA should be included in a new EAP.
- Because the EAP has not been updated since 1987, and because we have been unable to find documents or information that an emergency simulation has occurred since 1987, it is possible that some or all of the owners, staff, residents, and users of Roseburg Rod & Gun Club, River's Edge Mobile & RV Park, Amacher County Park, City of Roseburg water intake plant, and other riverside residents are unaware that they are in the inundation zone of a designated high hazard dam currently in poor

condition. These individuals, organizations, and businesses should be notified immediately.

- For similar reasons as stated above, it is possible that City of Roseburg officials, Douglas County Commissioners, or local safety officials are aware of this issue or prepared as they should be for a possible emergency. These officials should be notified immediately.

The current Winchester Dam EAP appears to violate multiple requirements listed under 690-020-0400(4), among other issues. The people, property, and public infrastructure of the North Umpqua River below Winchester Dam are currently at unacceptable risk of harm or death because WWCD ignored OWRD's repeated requests over years to update their EAP as required under statute. We urge you all to please take action now to correct this problem and ensure safety and emergency preparedness for our families, friends, and neighbors.

Sincerely,

Jim McCarthy  
Southern Oregon Program Director  
WaterWatch of Oregon

Tim Goforth  
President  
Steamboaters

Becky McRae  
Chair  
The North Umpqua Foundation

Ken Carloni  
President  
Umpqua Watersheds

Stanley Petrowski  
President  
South Umpqua Rural Community Partnership

Mike McCoy  
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Umpqua Valley Fly Fishers

Bob Rees  
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Northwest Guides and Anglers Association

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Thomas O'Keefe  
Pacific Northwest Stewardship Director  
American Whitewater

Dave Thomas  
Board  
McKenzie Flyfishers

Mike Brinkley, V.P. Conservation  
Greg Stumpf, President  
Oregon Council Fly Fishers International

Cc:

The Honorable Ron Wyden, U.S. Senate  
The Honorable Jeff Merkley, U.S. Senate  
The Honorable Peter DeFazio, U.S. House of Representatives

Director Richard Whitman, DEQ  
Kristen Hafer, U.S. Army Corps of Engineers  
Keith Mills, OWRD  
Cow Creek Band of Umpqua Tribe of Indians  
City of Roseburg  
Oregon Fish and Wildlife Commission  
Director Curt Melcher, ODFW  
Tim Walters, ODFW  
Chuck Wheeler, NOAA