



Oregon

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February 16, 2018

Dan Opalski, Director
Office of Water and Watersheds
USEPA Region 10
1200 Sixth Avenue, OWW-135
Seattle, WA 98101

Re: Submittal of the *Western Hood Subbasin Temperature Total Maximum Daily Load: Revision to the 2001 Western Hood Subbasin TMDL*

Dear Mr. Opalski:

I am very pleased to submit for approval the final version of the 2018 revision of the 2001 Western Hood Subbasin TMDL for temperature. This TMDL document was developed under §303(d) of the Clean Water Act and is being submitted via this transmittal for U.S. Environmental Protection Agency (USEPA) review and approval. This revision, when approved, constitutes an update to Oregon's Continuous Planning Process pursuant to Section 303(e) of the Clean Water Act.

DEQ is revising the Western Hood Subbasin Total Maximum Daily Load because Oregon's temperature standard has changed since adoption of the original 2001 TMDL. DEQ issued the original Western Hood Subbasin Total Maximum Daily Load for temperature in December 2001. The 2001 TMDL referenced the Oregon temperature standard which was in effect at that time (adopted by the Environmental Quality Commission in 1996). In December 2003, the EQC adopted a new temperature standard for the state of Oregon, which was approved by the USEPA in March 2004.

This TMDL revision updates the Western Hood Subbasin TMDL to comply with the state's current temperature standard. Several of the pertinent changes in the temperature standard which are specifically addressed in this revision, include:

1. A change in the applicable biologically based numeric criteria;
2. Adjustments to spawning time periods and locations; and
3. A change in the definition of "no measureable" or "insignificant" additions of authorized heat from human sources.

In order for the 2003 standard to be used in drafting new National Pollutant Discharge Elimination System permits, the wasteload allocations in the 2001 TMDL document needed to be recalculated and the TMDLs revised to incorporate the more recent standard. The new wasteload allocations will be used to reissue many of the permits for facilities in the subbasin in the next several years. In addition, DEQ took this opportunity to update other aspects of the 2001 Western Hood Subbasin TMDL to comply with the current standard and with the state's TMDL Rule (OAR 340-042-0025).

The 2018 revision document is to be considered a companion document to the original 2001 TMDL. The new allocations and TMDLs replace those included in the 2001 document; however some of the background material and modeling information remains unchanged. As necessary, information from the 2001 TMDL is either repeated in the 2018 revision or the reader is referred to the original 2001 TMDL



document. The 2001 Water Quality Management Plan continues to serve as the implementing mechanism for the Western Hood Subbasin TMDL and has not been revised..

The area covered by this TMDL revision is the same as was covered in the original 2001 TMDL document. It covers the western half of the Middle Columbia-Hood Subbasin (eight digit Hydrologic Unit Code 17070105) in the state of Oregon, an area of approximately 450 square miles draining to the Columbia River. This area includes all or a portion of the following ten-digit HUCs: Hood River (1707010507), West Fork Hood River (1707010506), East Fork Hood River (1707010505), Eagle Creek-Columbia River (1707010512), and Mosier Creek-Columbia River (1707010511). These watershed areas are collectively referred to as the Western Hood Subbasin. The major tributaries to the Columbia River in this area are Eagle Creek, Herman Creek, Phelps Creek, and Hood River.

This document sets TMDLs to address 303(d) listings for temperature and counts a TMDL as a waterbody-parameter. The revised TMDL represents the completion of 13 TMDLs: six for salmon and trout rearing and migration, five for core cold water habitat, and two for bull trout spawning and juvenile rearing. The 2018 revision includes six additional TMDLs than were in the 2001 document because of additional 303(d) listings in the subbasin between 2001 and 2018. The number of river miles covered by the 2018 TMDLs is also greater than in 2001 because of the changes in the listed segments. **Table 1** and **Table 2** outline the number of listed segments and TMDLs covered by the 2001 and 2018 documents.

In the evaluation of data for this TMDL revision, a number of additional impairments were identified (**Table 3**) Because these impairments were not identified as part of an Integrated Report assessment, the record ID and river miles are not included in this table. This TMDL revision covers these impaired streams and beneficial uses as well.

Table 1. Western Hood Subbasin 303(d) Listings addressed in the 2001 WHS TMDL and this 2018 TMDL Revision			
Parameter	Criterion	2001 WHS TMDL	2018 WHS TMDL Revision
		Listed Miles (# Listed Segments)	Listed Miles (# Listed Segments)
Temperature	Salmonid fish rearing	20.9 (5)	
	Bull trout	10.4 (2)	
	Salmon and trout rearing and		45.0 (6)
	Core cold water habitat		38.6 (5)
	Bull trout spawning and juvenile		13.3 (2)
	Mileage Total	31.3	96.9
	TMDL Total	7	13

Table 2. Western Hood Subbasin 303(d) Listings and TMDLs for Temperature

Water Body	River Miles	TMDL document	Applicable Numeric Criterion	Beneficial Use	TMDL Count 2001	TMDL Count 2018
2001 WHS TMDL						
Clear Branch, mouth to Laurance Lake	1.4	2001	10.0°C	Oregon bull trout	1	
Indian Creek, mouth to headwaters	7.5	2001	17.8°C	Salmonid fish rearing	1	
Hood River, Powerdale powerhouse to diversion dam	3.9	2001	17.8°C	Salmonid fish rearing	1	
Lake Branch, rivermile 10 to Lost Lake	1.0	2001	17.8°C	Salmonid fish rearing	1	
Middle Fork Hood River, mouth to Clear Branch	9.0	2001	10.0°C	Oregon bull trout	1	
Neal Creek, mouth to East/West Fork confluence	6.0	2001	17.8°C	Salmonid fish rearing	1	
Whiskey Creek, mouth to headwaters	2.5	2001	17.8°C	Salmonid fish rearing	1	
2018 WHS TMDL Revision						
Clear Branch	3.8	2018	12.0°C	Bull trout spawning and juvenile rearing		1
East Fork Hood River	9.8	2018	18.0°C	Salmon and trout rearing and migration		1
East Fork Hood River	17.6	2018	18.0°C	Salmon and trout rearing and migration		1
Hood River	3.1	2018	16.0°C	Core cold water habitat		1
Hood River	10.0	2018	16.0°C	Core cold water habitat		1
Indian Creek	7.8	2018	18.0°C	Salmon and trout rearing and migration		1
Lake Branch	10.0	2018	16.0°C	Core cold water habitat		1
Lake Branch	1.1	2018	16.0°C	Core cold water habitat		1
Middle Fork Hood River	9.5	2018	12.0°C	Bull trout spawning and juvenile rearing		1
Neal Creek	5.6	2018	18.0°C	Salmon and trout rearing and migration		1
Unnamed (Robinhood Cr.)	1.7	2018	18.0°C	Salmon and trout rearing and migration		1
West Fork Hood River	14.4	2018	16.0°C	Core cold water habitat		1
Whiskey Creek	2.5	2018	18.0°C	Salmon and trout rearing and migration		1

Table 3. Additional waterbodies identified as impaired in this TMDL assessment			
Water Body	LLID	Applicable Numeric Criterion	Beneficial Use (2003 Standard)
East Fork Hood River	1216272455754	13.0°C	Salmon and steelhead spawning
Hood River	1215067457204	13.0°C	Salmon and steelhead spawning
Lenz Creek	1215146456436	18.0°C	Salmon and trout rearing and migration
Neal Creek	1215257456640	13.0°C	Salmon and steelhead spawning
Odell Creek	1215398456564	16.0°C	Core cold water habitat
Odell Creek	1215398456564	13.0°C	Salmon and steelhead spawning
Un-named Pine Grove creek	1215278455850	18.0°C	Salmon and trout rearing and migration
Un-named creek, tributary to West Fork Neal Creek	1215137456488	18.0°C	Salmon and trout rearing and migration
West Fork Neal Creek	1214995455943	18.0°C	Salmon and trout rearing and migration

The public comment period for the draft *2018 Revision to the 2001 Western Hood Subbasin TMDL* was initially open from April 6, 2017 through June 6, 2017. Upon the request of USEPA, the public comment period was extended two weeks, closing on June 20, 2017. Copies of the draft TMDL documents were made available online. A public hearing was not held for the TMDL revision and no hearing was requested.

Written comments were received from four parties and addressed as part of the formal response to comment process. Comments were received from: USEPA, Columbia Riverkeeper, Oregon Association of Clean Water Agencies, and Middle Fork Irrigation District. DEQ has prepared responses and made revisions to the draft TMDL. The Response to Comments document and the modified TMDL document are included with this submittal.

We look forward to your approval of this TMDL.

Sincerely,

Richard Whitman
Director, Oregon Department of Environmental Quality

cc: Claire Schary, USEPA Region 10
Miranda Hodgkiss, USEPA Region 10
Jenny Wu, USEPA Region 10

Attachments: TMDL, Response to Comments, Order Memo