

**Date:** May 6, 2022

**To:** Environmental Quality Commission

**From:** Richard Whitman, Director

**Subject:** Item J: 2022 Water Quality Integrated Report (Informational)  
May 19-20, 2022, EQC Meeting

**Why this is Important** DEQ will provide an overview to the commission about the 2022 Integrated Report that will be submitted to the U.S. Environmental Protection Agency in May 2022 for final approval.

**Prior EQC Involvement** In September 2021, Water Quality Assessment staff provided an overview to the commission of several improvements to its 2022 Assessment Methodology with an emphasis on improved reporting and clarity of information related to watershed assessment units. Oregon statute requires DEQ to provide this information to the commission as part of the development of the assessment methodology, which must be developed prior to analyzing water quality data and drafting the Integrated Report.

**Background** DEQ is required under the Clean Water Act (CWA) to assess Oregon's surface water quality and report to the U.S. EPA on the condition of Oregon's waters every two years. This report is called the Integrated Report, as it combines CWA sections 305(b) to describe overall conditions of Oregon's waters and 303(d) to identify waters that do not meet water quality standards where a Total Maximum Daily Load (TMDL) needs to be developed. The last 2018/2020 Integrated Report, approved by EPA in November 2020, included significant improvements to the processes for assessing water quality, reporting units and publishing findings to a diverse audience. DEQ made continuous improvements to the 2022 assessment methodology and conducted extensive outreach on the assessment methodology changes including three informational webinars and a public notice for 49 days. DEQ conducted an informational webinar on the draft 2022 Integrated Report and accepted public comment on the draft for 30 days.

**2022 Integrated Report Results and** For the 2022 Water Quality Integrated Report, DEQ assessed five years of data provided by over 101 entities, comprising 7.7 million rows of data and over 140 different pollutants, totaling over 35,000 assessments using an updated methodology. The main water quality impairments continue to be for temperature, dissolved oxygen, biocriteria and E. coli.

**Comments  
Received**

DEQ completed assessment methodology improvements prior to drafting the 2022 Integrated Report. The 2022 updated assessment methodology incorporated more continuous datasets and increased clarity in reporting assessment conclusions with the inclusion of rationales and more localized information within watershed assessment units by assessing at the monitoring station level. Because of these updates, the 2022 Integrated Report incorporates more continuous datasets for an expanded set of parameters (i.e. temperature, dissolved oxygen, and pH).

DEQ released the draft report as an interactive map tool, story map and online database to provide the public several different ways to access information contained in the Integrated Report. For 2018/2020 Integrated Report, DEQ created fixed Assessment Units, which partitioned the state's waterbodies into manageable units for assessment and reporting purposes. These fixed units allowed DEQ to track changes in status between reporting cycles and communicate where new data indicate improvements or declines in water quality. Due to the vast amount of waterbodies in Oregon (> 2 million), smaller order streams were grouped together into "watershed units" at the sub-watershed scale, which is the smallest watershed delineation available for Oregon. During the 2018/2020 Integrated Report public comment period, DEQ received comments expressing concern about watershed units and the visualization of impaired waterbodies within watershed assessment units. In response, DEQ revised its map display to represent impaired watershed units as purple polygons and identified impaired waterbodies within the watershed assessment unit as dashed purple lines.

DEQ made the draft Integrated Report available for public comment from Jan. 12, 2022, through Feb. 11, 2022. Staff provided an informational webinar to discuss findings and demonstrate the functionality of the new tools which was recorded and available online. Water Quality Assessment staff will present the 2022 Integrated Report findings as part of its presentation.

DEQ staff received 84 unique comments from 18 entities during the comment period. Comments mainly focused on assessment methodologies, corrections to assessment conclusions, underlying data, TMDL priority ranking and other ways to evaluate beneficial use support. DEQ considered the comments and made revisions as needed to the draft Integrated Report.

**Key issues**

This year marks the 50<sup>th</sup> anniversary of the Clean Water Act. This milestone has brought recent attention to the Water Quality Integrated Report with a report titled "The Clean Water Act at 50: Promises Half Kept at the Half-Century Mark" by the Environmental Integrity Project, with subsequent news articles summarizing the findings of these assessments nationwide. In these summaries, Oregon was characterized as having the most miles of polluted or

impaired waterways, nationally. These broad conclusions don't take into account important differences among states and tribes' methodologies. The report itself notes results are not directly comparable between states for these reasons; however, most of the news coverage on the report did not include this information about the findings. In relative terms, DEQ has one of the nation's most comprehensive and data-rich Water Quality Integrated Report assessments, which results in a broader coverage of assessed waters with most impairments attributed to waterways that are too warm for sensitive fish species at certain times of the year.

While DEQ's efforts to improve clarity in reporting impaired waters within watershed assessment units were acknowledged in comments received, some commenters continued to express concern around the use and interpretation of results in these reporting units. DEQ recognizes the complexity this additional level of reporting creates for users and provided an interactive story map to help guide through the assessment process and addressed the topic in Frequently Asked Questions document. If a waterbody within a watershed assessment unit is not displayed with a dashed line, it is considered unassessed. DEQ will continue to work to improve and clarify reporting.

Another key issue that arose during the 2018/2020 and 2022 public comment periods involves the assessment of marine waters for ocean acidification and hypoxia. These parameters are currently outside of the assessments DEQ performs for the Water Quality Integrated Report. DEQ has initiated an Ocean Acidification and Hypoxia Technical Work Group to assist DEQ in the development of an assessment methodology for marine waters for a future Water Quality Integrated Report.

DEQ will discuss these issues and efforts in more detail as part of its presentation to the commission at the May EQC meeting.

**EQC  
Involvement**

This is an informational item and there is no EQC action requested. DEQ will bring regular updates on the Integrated Report and its methodologies to the commission.

Report prepared by: Lesley Merrick  
*Water Quality Division, Water Quality Assessment Program Lead*