



Wasco County Soil & Water Conservation District

2325 River Road, Suite 3

The Dalles, OR 97058-3551

Tel: (541) 705-3663, E-mail: wasco@wascoswcd.org

June 12, 2026

Smita Mehta
TMDL Basin Coordinator
Oregon Department of Environmental Quality
475 NE Bellevue Drive, Suite 110 Bend, OR 97701-7145

Re: Middle Columbia–Hood (Miles Creeks) Temperature TMDL – SWCD Comments

Dear Ms. Mehta and DEQ TMDL Team,
Thank you for the opportunity to participate in the Rule Advisory Committee for the Middle Columbia–Hood (Miles Creeks) Temperature TMDL. Wasco County Soil and Water Conservation District appreciates DEQ's work on this update and the chance to provide early feedback. Our comments reflect decades of on-the-ground restoration, monitoring, and landowner engagement across the Miles Creeks subbasin. They also reflect our statutory role as the Local Management Agency under the Agricultural Water Quality Management Area Plan, where we support ODA through voluntary conservation, education, outreach, and monitoring.

Our comments focus on four areas where clarification or adjustment would help ensure the TMDL aligns with site conditions, existing regulatory frameworks, and realistic implementation capacity.

1. Reconciling Modeled Effective Shade Targets With Documented Conditions: Relevant sections: TMDL 9.1.4 (Surrogate Measures), WQMP 2.1.1 (Streamside Vegetation Management Strategies)

The draft TMDL assigns effective shade targets based on modeled maximum potential vegetation. In dryland systems such as Fifteenmile Creek, this modeled condition does not reflect what the landscape can physiologically support. Although Fifteenmile is only one of several streams in the Miles Creeks TMDL, it is where most long-term data exist. Field-verified data collected through numerous grant monitoring and restoration assessments show that riparian vegetation on agricultural lands is already functioning at or near site capability.

The 2019 Conservation Effectiveness Partnership report supports this, noting that roughly 90 percent of perennial stream miles on private land in Fifteenmile have established riparian buffers that have been in place for decades and are providing shade, bank stability, and filtration consistent with site potential.

We request clarification on how DEQ intends to reconcile modeled existing shade values with field-verified conditions that already reflect site capability. Without this reconciliation, the TMDL may set expectations that exceed what the landscape can produce.

2. Alignment With ODA's Site-Capable Vegetation Standard: Relevant sections: WQMP 5.2.2 (Adequacy of AgWQ Program), 5.3.1.1 (Management Strategies)

Under the Agricultural Water Quality Program, ODA evaluates riparian condition based on site-capable vegetation. This is the regulatory standard agricultural landowners must meet under the Area Rules.

To ensure consistency across state programs, we request clarification on how TMDL shade targets will be interpreted within ODA's existing compliance framework, especially where modeled maximum potential vegetation exceeds what site capability, precipitation, soils, and disturbance regimes allow.

Clear alignment between the TMDL and ODA's statutory framework is essential for implementability and for maintaining consistent expectations for landowners.

3. Landscape Constraints That Limit Shade Potential: Relevant sections: WQMP 2.1.1 (Vegetation Strategies), 2.1.3 (Channel Management), TSD – Vegetation Zones and Shade Curves

Much of the Miles Creeks subbasin, including Fifteenmile and Eightmile, is characterized by entrenched channels, narrow or absent floodplains, shallow rocky soils, low-precipitation vegetation communities, and frequent wildfire intervals. The Lower Deschutes Agricultural Water Quality Management Area Plan identifies these constraints as outside agricultural control. Furthermore, the Lower Deschutes plan also outlines that site capable vegetation can be determined for a site by viewing nearby undisturbed reference sites with similar natural characteristics. Long-term monitoring of CREP and non-CREP buffers shows that even after 20 or more years of protection, many reaches support woody shrubs and grasses rather than tall, channel-spanning tree canopies (see examples in appendix A). This is consistent with ecological site descriptions and the disturbance history of the watershed.

We request that the final TMDL explicitly acknowledge these constraints and ensure that effective shade targets reflect achievable site-capable vegetation, not theoretical maximums that are unattainable in dryland systems.

4. Implementation Workload and Capacity Considerations: Relevant sections: WQMP 5.3 (Implementation Plan Requirements), 6 (Monitoring and Evaluation), 7 (Reasonable Assurance)

The draft WQMP includes new or expanded expectations for vegetation assessment, performance monitoring, reporting, and identification of priority areas for restoration. The SWCD and local Watershed Councils already conduct extensive monitoring, outreach, and project implementation throughout the Miles Creeks subbasin. We also have completed Strategic Implementation Areas on Mill Creek, Threemile, and Eightmile, where ODA documented that all agricultural properties were in compliance with Area Rules. While compliance does not necessarily mean site-capable vegetation is fully established, it does indicate that conditions are in good shape and trending positively.

Any additional requirements, especially if they involve new assessment methods or expanded reporting, will require additional funding and staff capacity. The WQMP acknowledges this challenge and encourages DMAs to partner with SWCDs, but the SWCD is not a DMA and does not have regulatory authority. Our ability to support implementation depends on adequate resourcing. We request that DEQ clarify which monitoring expectations apply to agricultural lands, ensure that any new requirements are coordinated with ODA's existing monitoring framework, and work with ODA to identify funding pathways for any expanded workload before the 2028 implementation date.

Closing Thoughts

Wasco County SWCD values our long-standing partnership with DEQ, ODA, and local landowners. Our goal is to ensure that the final TMDL reflects both the ecological realities of dryland watersheds and the substantial progress already achieved through decades of voluntary

conservation.

We appreciate your consideration of these comments and look forward to continued collaboration as the TMDL is refined. Please feel free to contact us if additional information would be helpful.

Sincerely,



Shilah Olson
District Manager



Drake Gilbert
Watershed Coordinator

Appendix A
Site Capable Vegetation: Reference Sites

Site 1: The pictures below show an upstream and downstream look from Company Hollow bridge on lower Fifteenmile Creek. The riparian area shown is one of the oldest CREP buffers on Fifteenmile Creek, and has also benefited from a floodplain restoration project done just upstream from the site many years ago. The site is characterized by large woody shrubs, primarily willow; but has an almost complete absence of channel spanning, canopy creating vegetation.



Site 2: Below are pictures from buffers along the stretch of Fifteenmile that runs along Wrentham Market Road. This site is characterized by extremely frequent fire intervals, shifting the plant community from the woody shrubs seen in site 1 to more herbaceous species. While there are some woody species hanging on, such as the elderberry near the camera in photo 2; they often don't have a chance to reach shade creating sizes due to frequent disturbance.



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