



# Oregon

Tina Kotek, Governor

Department of Environmental Quality

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March 4, 2025

Sent via electronic mail to: [Geoff.huntington@oregon.gov](mailto:Geoff.huntington@oregon.gov)

Geoff Huntington  
Senior Natural Resources Policy Advisor  
Office of Governor Tina Kotek  
900 Court Street NE  
Salem, OR 97301

RE: Deschutes Basin Water Quality

Dear Mr. Huntington,

DEQ appreciates the Governor's support of our efforts to protect and improve water quality in the Deschutes Basin and throughout Oregon. DEQ's current work in the Deschutes Basin includes water quality monitoring, assessment of impaired waters, and scheduled work to restore and maintain water quality using Total Maximum Daily Loads (TMDLs). DEQ is aware of public concerns relating to water quality in the Deschutes, including those surrounding Pelton Round Butte (PRB) Hydroelectric Project (Project). Our 2025 water quality workplan prioritizes evaluation of the PRB's 401 water quality certification (WQC) including the associated water quality management and monitoring plan (WQMMP). DEQ will initiate the evaluation this spring to assess water quality concerns in the Deschutes that may be addressed through potential modifications proposed to that plan to reflect current water-quality standards and operations. DEQ's evaluation will include consideration of water quality standards of the State of Oregon and the Confederated Tribes of the Warm Springs Water Control Board (CTWS WCB), and will propose a determination for next steps after we make these findings available in a report. This evaluation will build upon DEQ's previous considerations of proposed modification of PRB's WQMMP, the past adaptive management reflected in interim agreements, and will align with TMDL development in the Deschutes Basin.

As part of DEQ's 401 WQC Program, DEQ maintains oversight of PGE and the CTWS' implementation of the conditions of the 2002 401 WQC, which remains in effect. DEQ acknowledges the ongoing work of PGE and the CTWS to evaluate and adaptively manage operations of the PRB to meet the certification requirements, including fish passage and other water-quality conditions. PGE convenes multiple committees related to operations and implementation that include DEQ staff as participating members, including a Governing Board, and committees addressing fish and other water quality issues. One significant outcome of operational evaluations was the initiation of the Project's Selective Water Withdrawal (SWW) Tower that provided greater control over water temperatures released to the Deschutes River and facilitated fish passage past the Project. The operation of the SWW has resulted in downstream river temperatures that more closely resemble historic patterns without artificial cooling from the reservoir.

DEQ is prioritizing development of TMDLs in the Deschutes Basin to address surface water quality impairments. A project team has been assembled and the development of a water quality modeling plan for TMDLs has begun. DEQ's current timetable estimates completion of the TMDL for the Upper and

Little Deschutes subbasins by 2030. TMDL analyses usually are conducted at the scale of a river basin to understand all sources of pollution that may lead to water quality degradation. TMDLs also provide a framework to restore and maintain water quality through the adaptive management process. Findings from TMDL analyses will provide new insights into pollution that contributes to water quality degradation in the Deschutes Basin and set the baseline for implementing management strategies to support designated beneficial uses of surface waters. TMDL findings may also be incorporated into PRB's 401 WQC to help achieve compliance with water quality standards. DEQ has an established process for public participation throughout TMDL development and issuance that includes an advisory group or forum for gathering local input, a rulemaking advisory committee composed of representatives from varied constituent groups, a public hearing, and public comment period for submission of written feedback. Input from members of the public, agencies, and other interested parties are essential in the TMDL process and enable successful implementation.

As part of the 2025 evaluation, DEQ will re-engage in discussions with PGE and CTWS about the 401 WQC WQMMP, including consideration of lessons learned from SWW operations and potential needs for alignment with applicable water quality standards. The evaluation will continue DEQ's consideration of recent assessments, reports, and independent studies developed by PGE. DEQ will assess any proposed changes to the WQMMP for sufficiency in meeting Oregon's water quality standards and coordinate with the CTWS WCB to assure consideration of their applicable water quality standards. In addition to PGE and the CTWS, DEQ will collaborate with ODFW and other agencies, as needed, in evaluating findings. Communication with agency and stakeholder representatives on PGE's fish committee will also provide DEQ with input on findings and possible next steps. DEQ's evaluation report will include a determination as to any necessary modification to the 401 WQC to assure that the conditions are protective of water quality standards, reflect current knowledge and experience gained from SWW operations, and to coordinate with TMDL development within the Deschutes Basin.

Based on current resources, DEQ estimates that the above-described evaluation will be completed by fall of 2025. Should the evaluation indicate that a modification of the 401 WQC is appropriate to ensure water quality protection in the Deschutes River, DEQ will develop a timeline that includes DEQ's public processes as well as any processes and timelines established by the Federal Energy Regulatory Commission, related to the PRB license requirements.

DEQ appreciates the interest held by members of the public, environmental groups, agencies and other watershed partners in protecting fish habitat and water quality in the Deschutes Basin, especially as expressed in the letter of Trout Unlimited (TU) dated February 21, 2025. Ongoing collaboration allows for progress in improving Oregon's waters and protecting the many uses such waters sustain. DEQ recognizes and agrees with TU that the ambitious goals of the PRB settlement agreement to restore healthier, natural water quality conditions and self-sustaining runs of anadromous salmonids above the dams can be realized by working collaboratively to evaluate and determine science-based adaptive management strategies for the Project and restoration of habitat and water quality across the Deschutes Basin.

Sincerely,



Leah Feldon  
Director

Office of Governor Tina Kotek

March 4, 2025

Page 3

Cc: Ryan Smith, CTWS Warm Springs Power Water Enterprises  
Jim Lyman, CTWS Fisheries Department Manager  
Meghan Hill, PGE Senior Manager Hydro Compliance  
James Fraser, Trou Unlimited Oregon Policy Director  
Sarah Cloud, Deschutes River Alliance  
Jennifer Wigal, Oregon Department of Environmental Quality  
Matt Davis, Oregon Department of Environmental Quality