



# Oregon

Theodore R. Kulongoski, Governor

## Department of Environmental Quality

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October 20, 2009

Nancy Molina and Carl Schreck, Co-Chairs  
Independent Multidisciplinary Science Team  
Oregon State University  
Department of Forest Ecosystems & Society  
321 Richardson Hall  
Corvallis, OR 97331-5752

RE: Request for IMST Peer Review

Dear Ms. Molina and Dr. Schreck:

On behalf of the Department of Environmental Quality (DEQ) Water Quality Division, thank you for providing time at your October 1, 2009 meeting for my staff to brief you on DEQ's work to identify Oregon waters impaired by excess sediment. This work will help us in our efforts to protect and restore fish and aquatic life in Oregon's streams.

### Request

With this letter, we would like to formally request your review of the technical basis and approach we are using to develop sediment benchmarks for Oregon's Clean Water Act (CWA) Section 305(b)/303(d) assessment and reporting. The benchmarks and assessment are the first elements in DEQ's efforts to address sediment issues. Subsequent to this effort, we will work on ways to identify the sources of excess sediment, and develop appropriate restoration measures where needed in impaired streams. These important future efforts are not part of the work we are requesting your review on at this time.

### Focus

The specific questions DEQ would like the IMST to consider are:

1. Is the approach, described in Document #1 below, a credible and scientifically defensible method to select indicators and values to use to assess and identify streams impaired by excess sediment? Elements of the approach include:
  - a. Use of statewide reference site data,
  - b. Stream classification,
  - c. Sediment indicator selection, and
  - d. Process to select benchmark value.
2. Are the results of the technical evaluation of relevant and available data and information, described in Document #1 and contained in Document #2, valid and appropriate as the basis for selection of indicators and benchmark values?

### **Documents for IMST Review**

The following documents will be provided to IMST in early November, in electronic form, and hard copy if desired:

1. Draft Development and Selection of Bedded Sediment Benchmarks in Oregon, prepared by DEQ
2. Jessup, B., April 2009, Development of Bedded Sediment Benchmarks for Oregon Streams, Final Report Prepared by Tetra Tech, Inc. for Oregon Department of Environmental Quality and U.S. EPA Region 10, EPA contract number EPA-C-08-004. (31 page report plus Appendices A through I)

### **Additional Reference Material**

The following references may provide additional useful background information on the overall approach, and the specific analysis used in the technical evaluation:

1. U.S. EPA. 2006. Framework for Developing Suspended and Bedded Sediment (SABS) Water Quality Criteria. Office of Water, Office of Research and Development. EPA-822-R-06-001 <http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=164423>
2. Cade, B.S., Terrell, J.W., and Schroeder, R.L., Estimating Effects of Limiting Factors with Regression Quantiles. Ecology, 80(1), 199, pp 311-323 (will be provided)

### **Time Line**

DEQ would like to use these sediment benchmarks to evaluate data and identify impaired waters for Oregon's 2010 Integrated Reporting (305(b)/303(d)). This reporting is due to EPA in April 2010. In order to incorporate the sediment assessment for this reporting cycle, DEQ would like to have peer review comments in the form of a letter from the IMST by **January 15, 2010**.

DEQ appreciates the time, interest, and guidance the IMST has already provided on the scientific studies that form the basis for the current effort. We look forward to your insights and comments on this new approach as we continue to make use of this research in our program and policy decisions.

If you have any questions regarding this request, or the project work that has led to this approach, please contact Jennifer Wigal (503) 229-5323, or Karla Urbanowicz (503) 229-6099

Sincerely,



Neil Mullane, Administrator  
Water Quality Division

cc: Jennifer Wigal, WQ Standards and Assessment  
Karla Urbanowicz, WQ Standards and Assessment  
Eugene P. Foster, WQ Watershed Management  
Doug Drake, DEQ NWR  
Greg Pettit, DEQ Laboratory and Environmental Assessment Division