TUALATIN **RIVERKEEPERS**®

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January 10, 2008

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Alan Hoffmeister
Public Involvement Coordinator
Western Oregon Plan Revisions Office
Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

Dear Mr. Hoffmeister,

Tualatin Riverkeepers offer these comments on one specific aspect of the Western Oregon Plan Revision.

The Tualatin Total Maximum Daily Load specifies load allocations for sources of water pollution in the Tualatin River basin. BLM lands in the Tualatin Basin are located in the West Dairy Creek and McKay Creek subbasins. Analyses of temperature impact of anthropogenic sources on the Tualatin River, McKay Creek and East Dairy Creeks are included in the TMDL document – Appendix A. The TMDL states that to meet state temperature standards, "system potential" shade must be achieved on these waterways. The attached graphs show that this system potential shade is not being achieved on the Tualatin River, Dairy Creek or McKay Creek.

The TMDL allocates no temperature load to forestry, thus, any reduction of shade from BLM forest practices would be a violation of the Tualatin TMDL. For this reason, Tualatin Riverkeepers can support none of the proposed plan revision options. Even the "no action" option does nothing to restore system potential shade.

The drinking water supply for much of Washington County comes from Scoggins Reservoir and Barney Reservoir on the Trask River. The Scoggins Reservoir has already lost significant capacity due to sedimentation related to logging. Additional timber harvest above our drinking water supplies does not benefit the people of Washington County and puts our water supply at risk.

Tualatin Riverkeepers request that no additional logging be allowed in riparian areas of the Tualatin Basin (i.e. no reduction of streamside buffers) and that the Western Oregon Plan Revision include restoration of streamside vegetation on BLM properties to achieve system potential shade. Further we request that no logging be allowed above Scoggins

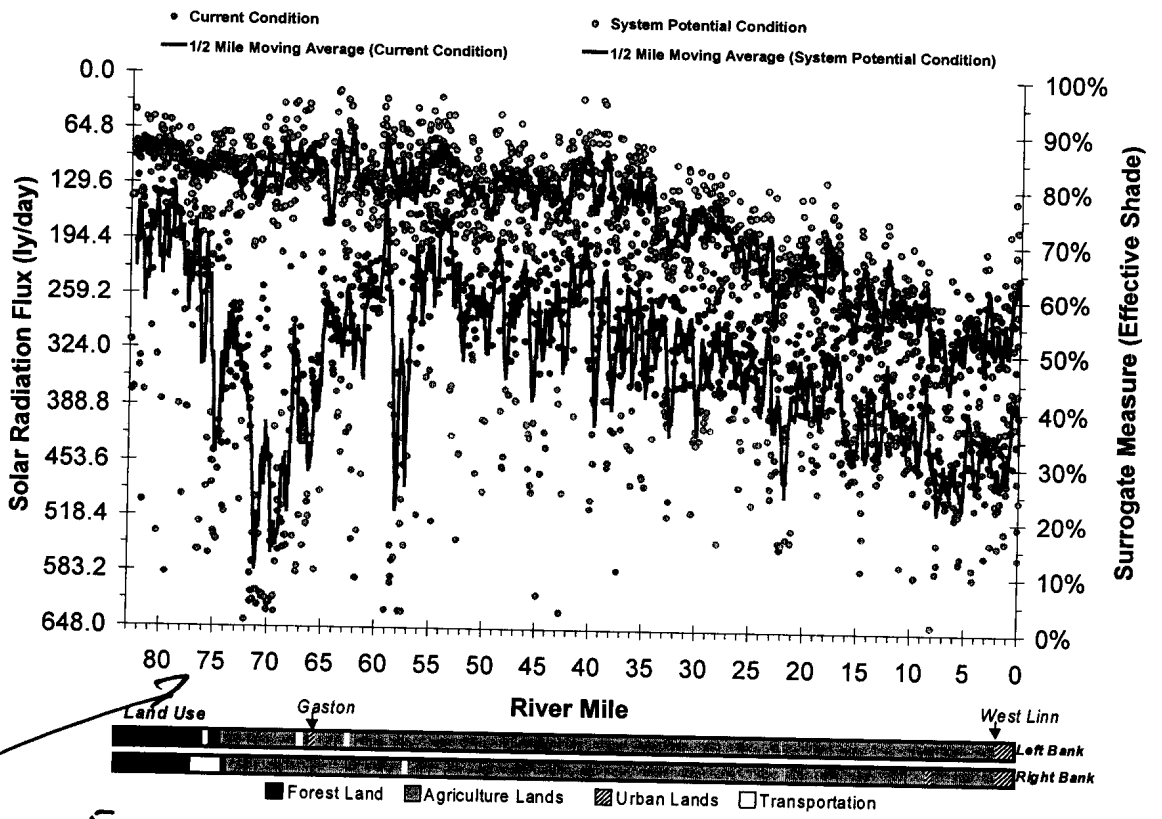
Reservoir and Barney Reservoir, the drinking water supply for much of Washington County

Sincerely,

Brian Wegener
Watershed Watch Coordinator
Tualatin Riverkeepers

Attachments: Tualatin TMDL Appendix A pages A-81, A-123, A-172

Figure A-49. Tualatin River Surrogate Measure for Non Point Sources – *Effective Shade*



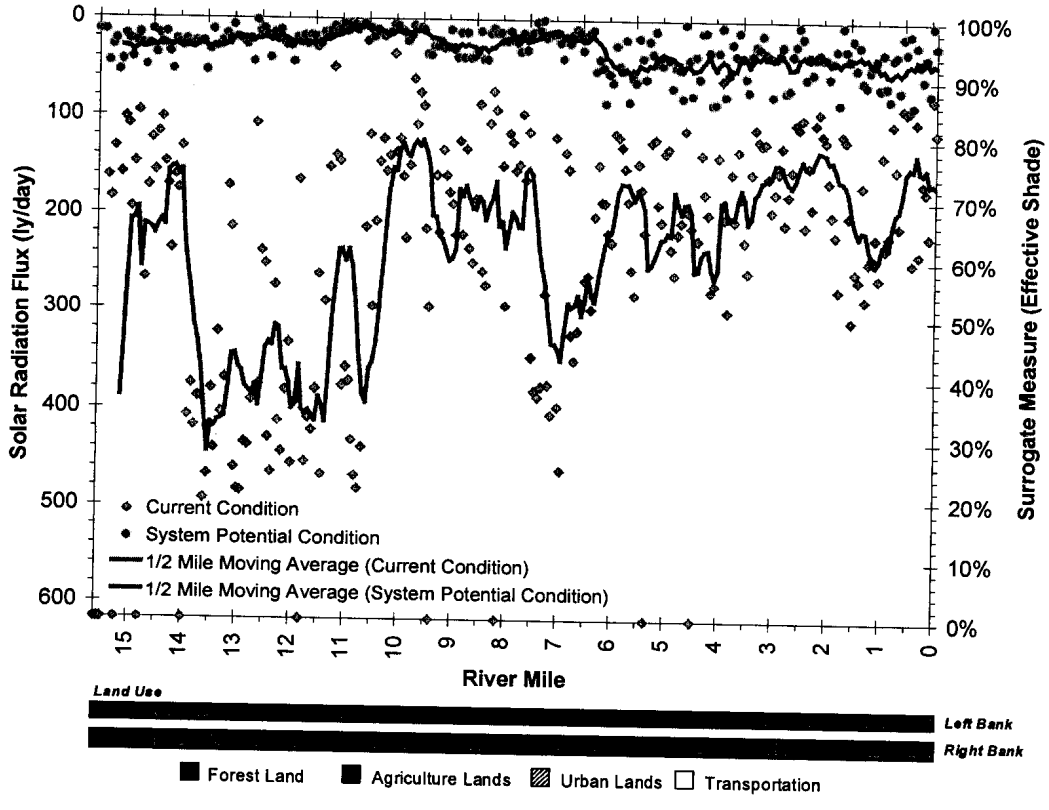
BLM
75.5 - 73.5

Water Quality Standard Attainment Analysis – CWA §303(d)(1)

Figure A-50 illustrates predicted Tualatin River temperatures at 6:00 PM on July 27, 1999 with the following scenarios: 1) non-point sources at Load Allocations and point source discharges at current levels, and 2) non-point source at Load Allocation and point source discharges removed. Predicted temperatures in the Tualatin River decrease dramatically at both Load Allocation scenarios. Point source discharge at current levels can dramatically raise stream temperatures under the Loading Allocation. **Figure A-50** also illustrates the effect of the 30 cfs flow augmentation from Hagg Reservoir on mainstem Tualatin River temperatures.

Two scenarios were run in which non-point sources were maintained at current conditions and point source discharge conditions were modified. **Figure A-51** displays predicted Tualatin River temperatures at 5:00 PM on July 27, 1999 with the following scenarios: 1) non-point sources at Current Conditions and point source discharges removed; and 2) non-point sources at Current Conditions and point sources at Waste Load Allocations. As can be seen in **Figure A-51**, the general temperature profiles were similar between these scenarios and Current Conditions; however, a localized effect downstream of the point source can be observed.

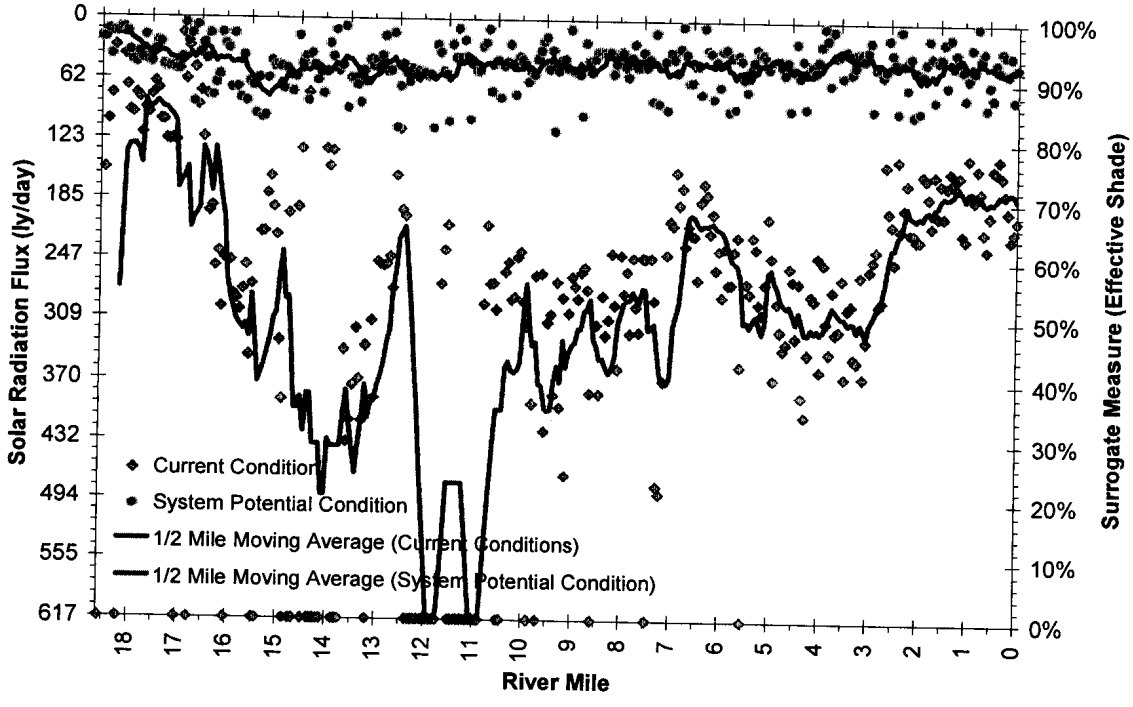
Figure A-141. McKay Creek Surrogate Measure for Non Point Sources - Effective Shade.



Water Quality Standard Attainment Analysis – CWA §303(d)(1)

Figure A-142 illustrates predicted McKay Creek temperatures at 5:00 PM on July 29, 1999 with the following scenarios: 1) non-point sources at Load Allocations and point source discharges at current levels, and 2) non-point source at Load Allocation and point source discharges removed. Predicted temperatures in McKay Creek are relatively similar at both Load Allocation scenarios. Point source discharge at current levels only slightly raises stream temperatures under the Loading Allocation (approximately river mile 4.0 to river mile 2.0).

Figure A-91. East Fork Dairy Creek Surrogate Measure for Non Point Sources – *Effective Shade*



Water Quality Standard Attainment Analysis – CWA §303(d)(1)

System Potential is achieved when (1) non-point source solar radiation loading reflects a riparian vegetation condition without human disturbance and (2) point source discharges cause no measurable increase in surface water temperature. Accordingly, **Figure A-92** presents predicted East Fork Dairy Creek temperatures at a Waste Load Allocation and Load Allocation scenario. **Figure A-93** illustrates that implementing Waste Load Allocations and Load Allocations will drastically reduce temperatures in East Fork Dairy Creek.