



June 20, 2023

(sent via email: aquaticlife.2022@deq.oregon.gov; emil.hnidey@deq.oregon.gov)

SUBJECT: AQUATIC LIFE RULEMAKING AND PH STANDARDS FOR THE CROOKED AND TROUT CREEK SUBBASINS

To Whom It May Concern:

The Deschutes Redbands Chapter of Trout Unlimited has over 720 members throughout Central Oregon many of whom are actively involved with a variety of volunteer projects, including the Crooked River and Trout Creek, intended to improve water quality. Given this context, please accept the following comments from our Chapter regarding the Aquatic Life Use rulemaking:

The Deschutes Redbands Chapter of TU opposes the proposed change in pH criteria for the Crooked River and Trout Creek.

High pH levels are stressful for native fish and can affect survival and viability of adult and juvenile salmonids. High pH also promotes the growth of algae blooms by making nutrients more biologically available in the water column.

These streams already have excessive algae production, which can lead to further harmful water quality impairments.

Other rivers in eastern Oregon have a maximum pH criteria of 9.0, but DEQ's technical advisory committee had a high level of certainty that pH above 8.5 was natural in those streams before DEQ set those standards (see June 1995 pH Issue Paper). DEQ has not shown that pH levels greater than 8.5 in the Crooked River or Trout Creek are natural.

We are concerned that this "one regulatory size fits all rivers in eastern Oregon" approach will undermine efforts to restore fish spawning habitats in these two watersheds. A significant portion of the wild steelhead entering the Deschutes Basin spawn in Trout Creek and the lower Crooked is critical habitat for bull trout. DEQ must set water quality standards that are based on natural conditions and the best available science which protects fish and other aquatic life. This proposal does not meet that standard.

Thank you for considering our comments.

Sincerely,

Shaun Pigott, President
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