



Gordon C. Jones
Lake Creek Lodge
13375 SW Forest Service Rd 1419
Camp Sherman, OR 97730

Aron Borok
Water Quality Permitting Variance Specialist
Oregon Department of Environmental Quality

Re:Nomination of Metolius River as a Tier 2.5 Outstanding
Resource Water(ORW)

Dear Mr. Borok,

Lake Creek Lodge is a 100 year old historic resort business within a quarter mile of the Metolius River. The purpose of this letter is to offer our support for the nomination by Friends of Metolius (FOM) and the Northwest Environmental Defense Council to designate the upper stretch of the Metolius River, from the headwaters to Candle Creek, as a Tier 2.5 waterway, and requests that the DEQ add the nomination to its high priority list for rulemaking in this triennial period.

Lake Creek Lodge opposed the nomination as a 2.0 waterway when it was previously proposed in 2022, as we were not properly aware of the reasons and advantages of the designation at the time. We have since become more informed of the protections that the 2.5 designation will provide for the Metolius, and believe that it will be a very important first step forward in our ongoing effort to provide long-term protection for the entire Metolius

watershed; from the ever encroaching over-use and degradation of the Metolius/Black Butte/Green Ridge and Madras Grasslands complex.

Our goals remain the same, to better protect the water quality of the river, advocate for the removal of Round Butte and Pelton Dams, and provide an overlay, such as National Monument, Wildlife Refuge, Resource Natural Area, or Community Forest, co-managed with the Confederated Tribes of Warm Springs; or even a designation of "Personhood" as was recently done for the Klamath River by the Yurok Tribe; to provide improved wildlife habitat, and most importantly restore the entire Deschutes Basin to a river system that will support anadromous fish runs and a living and healthy ecosystem. That is our mission and we will continue to work with all stakeholders to reach this goal.

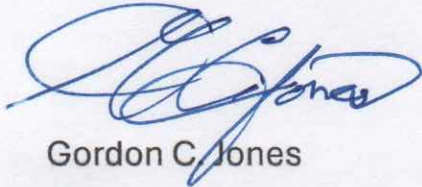
While there are other protections in place that limit development in the Metolius Basin, the ORW designation is specifically about protecting water quality and this unique attribute of the protection is not offered by any other designations or overlays. The river is designated as an Oregon Scenic Waterway, a federal Wild & Scenic River, in which outstanding water quality is identified as one of the Outstandingly Remarkable Values, and is the only Area of Critical State Concern in the State of Oregon. None of these protection regimes specifically protect the quality of the water-- they are either silent on protecting water quality or are so vague that preventing degradation under one of these regimes would be very difficult if not impossible. It is our sincere hope that this designation will help us achieve the ultimate goal of creating a truly Wild & Scenic River that, together with the Deschutes River, the Crooked River and all of their tributaries will some day run free from their headwaters to the Columbia River. Only then can the water quality of this spectacular river system be restored and maintained as a freely flowing, wild and scenic waterway.

Collaboration is core to the achievement of all aspects of protecting a river as special as the Metolius, and there is the potential for a diversity of stakeholder opinions associated with the Metolius River, given its relatively complex governance, land management, public and private lands, and with the level of community development, such as the commercial district, elementary school, church, over 100 river cabins, and several lodges and resorts.

The Tier 2.5 designation is ideal in this instance because it provides more flexibility to account for the complexities in land management. During rulemaking, the concerns of all the stakeholders will be heard and the rules that are eventually adopted will protect the exceptional quality of the Metolius water while giving flexibility to stakeholders. The Metolius is one of Oregon's legacy rivers – it is often referred to as the crown jewel of Oregon's river. The river enjoys an active public constituency locally, regionally and even internationally. The DEQ should do everything in its power to protect the quality of the water in this iconic river now and far into the future. Initiating rulemaking for this nomination is a good place to start and we look forward to an inclusive and collaborative process.

Thank you for the opportunity to express support for the nomination of the Metolius River as a Tier 2.5 waterway.

Sincerely,



Gordon C. Jones

Owner, Lake Creek Lodge

Attachement:



FOUR WAYS DAMS DAMAGE RIVERS

1. DAMS BLOCK RIVERS

Dams prevent fish migration. This limits their ability to access spawning habitat, seek out food resources, and escape predation. Fish passage structures can enable a percentage of fish to pass around a dam, but their effectiveness decreases depending on the species of fish and the number of dams fish have to traverse.

2. DAMS SLOW RIVERS

Aquatic organisms, including fish such as salmon and river herring, depend on steady flows to guide them.

Stagnant reservoir pools disorient migrating fish and can significantly increase the duration of their migration.

Dams can also alter the timing of flows. Some hydropower dams, for example, withhold and then release water to generate power for peak demand periods. These irregular releases destroy natural seasonal flow variations that trigger natural growth and reproduction cycles in many species.

3. DAMS ALTER HABITAT

Dams change the way rivers function. They can trap sediment, burying rock riverbeds where fish spawn.

Gravel, logs, and other important food and habitat features can also become trapped behind dams. This negatively affects the creation and maintenance of more complex habitat (e.g., riffles, pools) downstream.

Dams that divert water for power and other uses also remove water needed for healthy in-stream ecosystems. Peaking power operations can cause dramatic changes in reservoir water levels. This can leave stretches below dams completely de-watered.

4. DAMS IMPACT WATER QUALITY

Slow-moving or still reservoirs can heat up, resulting in abnormal temperature fluctuations which can affect sensitive species. This can lead to algal blooms and decreased oxygen levels.

Other dams decrease temperatures by releasing cooled, oxygen-deprived water from the reservoir bottom.

Dear Mr. Borok,

I was very lucky to grow up in Camp Sherman, playing with bugs in the Metolius and occasionally braving a swim in its cool water. I now live in Washington, but recently returned for two nights camping near the Headwaters. This river is undeniably unique, and has already been recognized as a Wild and Scenic River.

Whilst home, I heard that Friends of the Metolius had nominated the Metolius River for protection as a Tier 2.5 waterway. I am emailing to voice my support for this nomination and my hope that these protections will help the Metolius to withstand the onslaught of human impact so that I can share this place with my children.

I am sure that there are other worthy rivers that have been nominated in Oregon. I still feel that the Metolius is unique and worth protecting in special ways. Even if Tier 2.5 status is not granted, I hope that you keep the Metolius in mind as you do your work for the waterways of Oregon.

All the best,

Haley Jane Fukumoto

August 24, 2024

RE: Metolius River – Nomination as a Tier 2.5 waterway.

TO: Aron Borok, Oregon Department of Environmental Quality.

My name is Rod Bonacker and I am a citizen of Oregon, residing in Sisters, very near the Metolius River. I am writing today in support of the nomination by Friends of the Metolius, Northwest Environmental Defense Council, and others to have the Metolius River designated as an Outstanding Resource Water.

I retired in 2016 from a 47-year career with the US Forest Service. Among many complicated land use and planning projects, I am most proud of the Forest Services' development of the Metolius Wild and Scenic River (MWSR) Management Plan in 1996, a project on which I served as Team Leader and primary author. In the Record of Decision for the Management Plan, we recommended that the agency continue to work with Oregon DEQ to designate the river as an Outstanding Resource Water.

The Wild and Scenic Rivers Act was signed into law in 1968 with the expressed goal to “preserve certain rivers with outstanding natural, cultural, or recreational features in a free-flowing condition for the enjoyment of present and future generations.” The Metolius River was added to the national system in 1988. Concurrently, portions of the river were added to the Oregon State Scenic Waterway system. In 1992, The Confederated Tribes of the Warm Springs Reservation of Oregon also recognized that the Metolius was worthy of extra protection in the adoption of their new Integrated Resource Management Plan. Also, it is the only Area of Critical State Concern in the State of Oregon. However, none of these protection regimes specifically protect the quality of the water -- they are either silent on protecting water quality altogether or are so vague that preventing degradation under one of these regimes would be very difficult if not impossible

Integral to designation as a Wild and Scenic River is the existence of one or more Outstandingly Remarkable Values: river characteristics or conditions that are unique or important on a regional or national scale. Water Quality was identified for the Metolius because of the extremely high quality of the water over the full length of the river, and the stability of flows and water temperatures. The River Management Plan was designed to protect and enhance that water quality in perpetuity. Water quality parameters, including temperature, turbidity, and the presence of natural chemical elements and potential pollutants have been systematically monitored by the USFS, ODEQ, ODFW, and the Friends of the Metolius since 1996.

But threats to the Metolius that existed in 1988 when the river was designated continue to exist today. Some of these, such as impacts to temperature, are exacerbated by the effects of climate change. Others exist from development of private lands within and adjacent to the MWSR corridor, and the ever-increasing recreational uses of the river.

The Forest Service is charged with implementing the Management Plan and protecting the river's values. Like all public agencies, they are challenged by constraints in budget and staffing, conflicting desires from stakeholders, oscillating priorities, and the pressures of changing climate. This designation strengthens the Forest Services' ability to protect water quality, and it is consistent with the goals of the State Scenic Waterway Act. The uniquely high quality of the waters of the Metolius River, and its place in the hearts of Oregonians deserve nothing less than the utmost in protection.

I support the nomination by Friends of Metolius (FOM) and the Northwest Environmental Defense Council to designate the upper stretch of the Metolius River, from the headwaters to Candle Creek, as a Tier 2.5 waterway, and requests that the DEQ add the nomination to its high priority list for rulemaking in this triennial period.

While there are other protections in place that limit development in the Metolius Basin, the ORW designation is specifically about protecting water quality and this unique attribute of the protection is not offered by any other protections.

Collaboration is core to the achievement of all aspects of protecting a river as special as the Metolius. Perhaps more so than with the three existing ORW designations in the State of Oregon, there is the potential for a diversity of stakeholder opinions associated with the Metolius River, given its relatively complex governance, land management, public and private lands, and with the level of development. The Tier 2.5 designation is ideal in this instance because it provides more flexibility to account for the complexities in land management. During rulemaking, the concerns of all the stakeholders will be heard and the rules that are eventually adopted will protect the exceptional quality of the Metolius water while giving flexibility to stakeholders.

The Metolius is one of Oregon's legacy rivers – it is often referred to as the crown jewel of Oregon's rivers. Its cold, pristine water provides critical habitat for endangered fisheries, including Bull Trout. The river enjoys an active public constituency locally, regionally, and even internationally. The DEQ should do everything in its power to protect the quality of the water in this iconic river now and far into the future. Initiating rulemaking for this nomination is a good place to start.

Thank you for the opportunity to express support for the nomination of the Metolius River as a Tier 2.5 waterway.

Respectfully,

ROD BONACKER
blackbuttebooks@gmail.com

MARET PAJUTEE
mpajutee@gmail.com



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August 23, 2024

Via email to aron.borok@deq.oregon.gov

Aron Borok

Water Quality Permitting Variance Specialist

Oregon Department of Environmental Quality

Re: Nomination of Metolius River as a Tier 2.5 Outstanding Resource Water

Dear Mr. Borok,

Black Butte Conservancy supports the nomination by Friends of Metolius (FOM) and the Northwest Environmental Defense Council to designate the upper stretch of the Metolius River, from the headwaters to Candle Creek, as a Tier 2.5 waterway, and requests that the DEQ add the nomination to its high priority list for rulemaking in this triennial period.

Black Butte Conservancy's mission is to empower our community to restore, conserve and enhance Central Oregon's Black Butte region, now and for the future. Taking and supporting actions which will protect water quality is core to our mission.

While there are other protections in place that limit development in the Metolius Basin, the ORW designation is specifically about protecting water quality and this unique attribute of the protection is not offered by any other protections. The river is designated as an Oregon Scenic Waterway, a federal Wild & Scenic River in which outstanding water quality is identified as one of the Outstandingly Remarkable Values, and is the only Area of Critical State Concern in the State of Oregon. None of these protection regimes specifically protect the quality of the water -- they are either silent on protecting water quality or are so vague that preventing degradation would be very difficult if not impossible.

Collaboration is core to the achievement of all aspects of our organization's mission. Perhaps more so than with the three existing ORW designations in the State of Oregon, there is the potential for a diversity of stakeholder opinions associated with

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FEIN# 27-2869980



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Thank you for the opportunity for our organization to express support for the nomination of the Metolius River as a Tier 2.5 waterway.

Sincerely,

Nancy Hinnen

Secretary, Black Butte Conservancy