

Crosswalk to changes in the Umpqua Basin WQMP for Temperature

DEQ prepared this crosswalk to help reviewers distinguish substantive revisions from the numerous editorial changes incorporated into the Public Notice draft. It summarizes the key substantive and structural changes made between the draft WQMP presented at the April 29, 2026, RAC meeting and the version released for Public Notice. Editorial revisions and minor clarifications are not included.

Section 2: Condition assessment and problem description

- Clarified that TMDL allocations and surrogate measures apply not only to impaired waters but also to unimpaired and unassessed waters within the project area.

Section 4: Management strategies

- Added two new dam and reservoir strategies to Table 2 addressing reservoir residence time and sediment/depth management for cold-water storage.
- Revised riparian infrastructure strategy by replacing “avoid new stream crossings” with “minimize the number of new stream crossings” and added decommissioning of unneeded roads.
- Added a new section summarizing implementation activities since adoption of the 2006 WQMP.

Section 5: Timelines and milestones

- Reorganized Section 5 into subsections (5.2, 5.3, 5.4) to align with rule elements.

Section 7: Identification of responsible persons

- Reorganized Section 7 into two subsections (7.1 and 7.2) to distinguish entities required vs. not required to submit implementation plans.
- Added a new table (Table 3) that links each responsible persons not currently required to submit implementation plans to the specific screening criterion for exemption.
- Updated responsible person lists and clarified that dam and reservoir operators are explicitly identified as responsible persons in Appendix C.
- Added new exemption category for dam and reservoir owners/operators who qualify under screening criteria in Section 9.4.2.
- Removed implementation plan requirements for the Oregon Department of State Lands due to limited authority or opportunity
- Clarified that ODA and ODF implementation responsibilities are based on active land use and may overlap with local government jurisdictions

Section 8: Existing implementation plans

- Updated the ODA section to reflect agreed-upon language developed by ODA, DEQ, and DOJ regarding the Agricultural Water Quality Management Program, DEQ's Area Plan review role, and ODA's commitment to develop a DEQ-approved TMDL implementation plan.
- Updated the ODF section to reflect agreed-upon language developed by ODF, DEQ, and DOJ and OFA's commitment to develop a DEQ-approved TMDL implementation plan.

Section 9: Implementation plan requirements

- Reorganized implementation plan requirements (formerly Section 10) into new Section 9 to align with OAR 340-042-0080(4).
- Moved the streamside evaluation and shade gap analysis framework (formerly Section 9) into Section 9.4 as implementation plan requirements.
- Moved dam and reservoir monitoring and assessment (formerly Section 11) into Section 9.4.2 to integrate these requirements with implementation planning.
- Section 9.1 – Clarified that implementation plans should identify the lands, facilities, or activities over which the responsible person has legal authority to implement management strategies, including areas where implementation responsibilities may overlap.
- Section 9.3 - Revised to focus on implementation plan performance monitoring and reporting requirements. Implementation plan review and revision requirements are now addressed in Section 10.
- Section 9.3 - Clarified that five-year reviews evaluate cumulative implementation progress and management strategy effectiveness to inform continued implementation and plan revisions.
- Reorganized additional implementation plan elements (formerly Section 10.4) into new Section 9.5. No substantive changes; content updated for clarity only.

Section 9.4.1: Streamside evaluation and shade gap analysis

- Aligned the schedule for streamside evaluations and shade gap analyses with annual reporting rather than standalone deadlines following EQC adoption.
- Revised the streamside evaluation submission schedule to the Year 4 annual report.
- Added a new "Vegetation Management" streamside evaluation category for areas requiring active stand management to improve long-term canopy development.
- Clarified that responsible persons must identify, map, and characterize all streamside areas that reasonably fall within their legal authority, recognizing that multiple responsible persons may have authority within the same geographic area.
- Clarified that responsible persons required to complete a shade gap analysis must use those results to inform streamside evaluations, while other responsible persons may rely on TMDL shade gap results or other DEQ-approved information sources.
- Allowed responsible persons, with DEQ approval, to use existing programs or recently completed analyses to satisfy streamside evaluation requirements.
- Clarified that ODA and ODF must complete additional shade gap analyses only where the TMDL lacks modeled results and DEQ has determined existing management may not provide reasonable assurance of attaining load allocations.

Section 9.4.2: Dam and reservoir requirements

- Revised monitoring requirements to allow monitoring frequencies sufficient to calculate the 7-day average daily maximum (7DADM) temperature.
- Reframed the implementation pathways as attainment pathways for demonstrating dam and reservoir load allocation attainment.
- Redefined the surrogate measure attainment pathway to demonstrate attainment with the surrogate measure.
- Revised the cumulative effects analysis pathway to demonstrate consistency with applicable water quality standards, including the assigned Human Use Allowance.
- Clarified cumulative effects analysis expectations where the Protecting Cold Water criterion does not apply.

Section 10: Implementation plan submittal and revisions

- Reorganized implementation plan submission and implementation plan revision requirements into separate sections (Sections 10.1 and 10.2).
- Expanded the circumstances under which DEQ may require implementation plan revisions beyond the standard five-year cycle.

Section 11: Monitoring and evaluation of progress

- Reorganized monitoring and evaluation content (formerly Section 12) into new Section 11 to align with WQMP structure.
- Clarified monitoring responsibilities and basin coordination to improve readability; no changes to responsible person obligations.
- Clarified annual and five-year review processes without altering DEQ authority or review criteria.
- Updated narrative describing how monitoring results support adaptive management and inform WQMP/TMDL revisions

Section 12: Public involvement, maintenance, and funding

- Reorganized supporting program elements (public involvement, maintenance, and funding) from old Section 12 into new Section 9.5. No substantive changes.
- Refocused language to describe responsible persons' obligations in implementation plans; DEQ historical outreach narrative removed for clarity.

Section 13: Reasonable assurance

- Removed discussion of the three-point test in OAR 340-042-0040(6)(g), EPA reasonable assurance guidance, and the relationship between nonpoint source load reductions and wasteload allocations because those concepts are addressed in EPA's TMDL reasonable assurance demonstration.
- Streamlined and refocused the section on OAR 340-042-0040(4)(I)(J), emphasizing DEQ's implementation framework.

- Removed background discussion of EPA's TMDL development, Clean Water Act §303(d), climate programs, implementation uncertainty, and TMDL revision authorities to avoid duplicating information addressed in the TMDL or elsewhere in the WQMP.
- Reorganized the section around DEQ's reasonable assurance accountability framework, consolidating implementation mechanisms, monitoring, reporting, enforcement, and adaptive management into a single implementation-focused narrative.
- Updated the discussion of responsible persons and implementation plans to identify required implementation plan responsibilities and clarify the role of ODA, ODF, BLM, and USFS in implementing the WQMP across approximately 93 percent of streamside lands.

Appendices

- Added new Appendix A describing the GIS methods, decision tree, and mapping used to identify land ownership, jurisdiction, and potential responsible persons.
- Revised Appendix B to focus on the list of responsible persons and implementation responsibilities, with screening criteria relocated to Section 7, Table 3 and GIS methods documented in Appendix A.

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