



Oregon

Tina Kotek, Governor

Department of Environmental Quality

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November 8, 2023

Nina Caldwell
Oregon Department of Agriculture
Agricultural Water Quality Program
635 Capitol St. NE
Salem, OR 97301-2532

Dear Nina:

Thank you for the opportunity to review the 2023 draft of the Klamath Headwaters Agricultural Water Quality Management Area Plan (area plan).

I received the draft area plan on October 6, 2023. Thank you for providing ample time for review and feedback before the LAC meeting.

DEQ considers the following water quality issues top priorities for the Klamath Headwaters management area:

Total Phosphorus

- Total phosphorus concentration trends appear to be showing signs of improvement in rivers in the management area, but the Williamson River monitoring location still exceeds the TMDL surrogate standard. Long-term monitoring locations in Upper Klamath Lake continue to show degrading phosphorus trends.
- Implementation priorities should continue to include management of riparian areas, irrigation practices that prevent erosion and promote growth of riparian vegetation, livestock and grazing best management practices, and continued reductions in agricultural pump-offs in order to achieve external loading reduction targets in the Upper Klamath Lake Drainage and Upper Klamath and Lost River Subbasins TMDLs.

Temperature

- Continuous temperature monitoring in the management area shows stream temperatures continuing to exceed water quality standards with all of the monitoring locations in the management area with long-term records continuing to show a degrading temperature trend.
- Implementation priorities should continue to include protecting, maintaining, and establishing riparian vegetation to provide water quality functions and achieve shade targets established in the Upper Klamath Lake Drainage and Upper Klamath and Lost River Subbasins TMDLs.

Based on DEQ's review, there are important implementation plan components missing from the draft area plan. DEQ requests consideration and incorporation of the following recommendations in the final draft of the area plan.

Chapter 3: Timelines

Timelines are an important component of resource planning and assessing incremental progress. Adaptive management requires timelines to develop methods to evaluate whether implementation actions are performing as expected over time.

- Identify ODA's timeline for having all recommended BMPs fully implemented. A timeline for BMP implementation will support adaptive management as well as communicate implementation expectations to agricultural producers and managers.

Chapter 3: Measurable Objectives

Measurable objectives provide a metric that can be used to measure and track progress. This is especially critical for outcome-based programs, which rely on quantifying whether or not objectives are being achieved.



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- ODA only identifies measurable objectives for the Focus Area (FA) and Strategic Implementation Areas (SIA). DEQ recommends that ODA develop measurable objectives throughout the management area, including but not limited to FAs and SIAs.
- In the Middle Sprague and Upper Sprague SIAs, the measurable objectives are not directly related to water quality improvements. DEQ recommends that ODA develop measurable objectives for the SIAs that can show progress towards load reduction targets identified in the Upper Klamath Lake Drainage TMDL.
- While many great initiatives and BMPs are detailed in Chapter 2, they are not addressed as objectives in Chapter 3. DEQ recommends incorporating these water quality improvement BMPs into specific objectives to be carried out throughout the management area.

If you have any questions or concerns about the enclosed comments, please contact me at (503) 857-9830 or tyler.dearman@deq.state.or.us.

Sincerely,

Tyler Deraman
DEQ Klamath Basin Coordinator

cc: Steve Mrazik, DEQ Watersheds Manager
Sara Slater, DEQ Eastern Region Watershed Manager
Ryan Michie, DEQ Senior Water Quality Analyst