



# Oregon

Kate Brown, Governor

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Theresa DeBardelaben  
Oregon Department of Agriculture  
Agricultural Water Quality Program  
635 Capitol Street NE  
Salem, OR 97301

Dear Theresa DeBardelaben:

Thank you for the opportunity to review the 2021 draft of the Lower Deschutes Agricultural Water Quality Management Area Plan (area plan).

I received the draft area plan on November 15<sup>th</sup>.

DEQ considers the following water quality issues top priorities for the Lower Deschutes management area:

## **Temperature**

- Continuous temperature monitoring in the management area, such as by the Wasco SWCD on Fifteenmile, shows stream temperatures continue to exceed water quality standards.
- Implementation priorities should continue to include protecting, maintaining and establishing riparian vegetation to provide water quality functions and achieve shade targets established in the Miles Creeks Subbasin Temperature TMDL.

## **E. coli**

- Wasco SWCD and The Dalles Watershed Council collect E. coli data in the plan area. Several creeks in the plan area experience frequent exceedances of the acute and chronic E. coli standard every year throughout the monitoring season. For example, in 2021, most Mill Creek E. coli sampling sites in ag areas had multiple exceedances of the acute E. coli standard.
- While ag may not be the only source of E. coli, it is a likely contributor. Implementation priorities should continue to include consistent implementation of best management practices for manure.

## **Sediment/Phosphorus**

- Elevated phosphorus in the plan area may be due to erosion and transport of sediment. Excessive fine sediment has been a documented issue in the plan area but the source(s) of the sediment is not well understood.
- Implementation priorities should include monitoring sediment/phosphorus to determine whether there are current sources of sediment that contribute to elevated levels.

Based on DEQ's review, there are important implementation plan components missing from the draft area plan. DEQ requests that the following recommendations be considered and incorporated into the final draft of the area plan.

## **Chapter 3: Timelines**

Timelines are an important component of resource planning and assessing incremental progress. Timelines are also needed for adaptive management, which requires developing methods to evaluate whether implementation actions are performing as expected over time.

- The area plan should clearly identify when ag's heat load allocation will be achieved. The heat load allocation for all anthropogenic nonpoint sources, including ag, is .05C.
- The area plan should specify when water quality will be fully in attainment of water quality standards.

### **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.

- The measurable objective metric for temperature should translate into the metrics used by the Temperature TMDL targets. The area plan uses Vegetation Class as the metric for management objectives that address temperature, but there is no translation of Vegetation Class to Effective Shade, the metric used by the TMDL. This makes it impossible to tell if progress is being made toward water quality targets and goals.
- The geographic area for measurable objectives should include intermittent as well as perennial streams.
- The area plan should specify measurable objectives for effectiveness monitoring.
- Water quality monitoring needs should be identified and a strategy to meeting those monitoring needs should be developed.

### **Chapter 4: LAC Engagement**

Opportunities to engage the LAC are important for plan success. The SIA monitoring program is a good opportunity to educate and inform LAC members about the role that water quality monitoring plays in tracking progress over time.

- The draft area plan does not indicate whether or not the LAC was informed of or provided an opportunity to review the monitoring plan for the SIA. DEQ recommends providing an update in the area plan about the status of the SIA monitoring process and include LAC feedback.

### **Chapter 4: Strategic Implementation Areas and Focus Areas**

SIAs and FAs have the potential to show real progress on moving areas towards water quality targets and goals because of their focused attention and funding. It's important for ag plans to show the outcome of implementation in these areas.

- The area plan should identify whether SIAs and FAs are active and what their end dates are.
- The area plan should include a map of SIAs and FAs to locate them within the ag plan area.
- The area plan should include information about the water quality monitoring programs associated with each SIA and FA. Include a description of how ODA is supporting the monitoring programs.

If you have any question or concerns about the enclosed comments, please contact Smita Mehta at (541) 633-2022, [smita.mehta@deq.state.or.us](mailto:smita.mehta@deq.state.or.us).

Sincerely,

Smita Mehta  
TMDL Basin Coordinator

ec: Gene Foster, DEQ Watersheds Manager  
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