



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Western Region Coos Bay Office
465 Elrod Ave., Suite 201
Coos Bay, OR 97420
(541) 269-2721
FAX (541) 269-7984
TTY 711

March 7, 2023

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

Dear Beth Pietrzak:

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

I received the initial draft area plan on February 3, 2023, however multiple sections in Chapters 3 and 4 had not been updated yet. I received a complete draft on February 23, 2023 about four weeks prior to the LAC meeting, scheduled for March 23, 2023. To ensure a thorough DEQ review, please provide a complete draft of the updated area plan at least four to six weeks in advance of the LAC meeting. A complete draft should include SWCD updates on measurable objectives.

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

Temperature & Dissolved Oxygen

- Continuous temperature monitoring in the management area shows stream temperatures continue to exceed water quality standards. The lack of Status and Trends reporting for the Curry Management Area identify a lack of available data to monitor and track this important parameter for the South Coast.
- The DEQ Integrated Report for 2022 list five subbasins that are limited for dissolved oxygen exceedances. While DO levels are being attained at all six major subbasins of the Curry Area, two are in a degrading trend.
- Implementation priorities should continue to include protecting, maintaining and establishing riparian vegetation to provide water quality function.

Bacteria

- Currently there is limited data available for bacteria in the management area. Existing data near the Floras, Sixes, Elk and Winchuck Rivers indicate that water quality is attaining, all sites are in

a degrading trend.

- To improve and maintain the current status and trends for bacteria in the management area, priorities should continue to include consistent implementation of best management practices for manure and nutrients, which also benefit the Southern Willamette Valley Groundwater Management Area.

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: 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 SWCD has identified measurable objectives for the Focus Area (FA) and Strategic Implementation Area (SIA) only. DEQ recommends that ODA develop measurable objectives and timelines throughout the management area, including but not limited to FAs.

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.

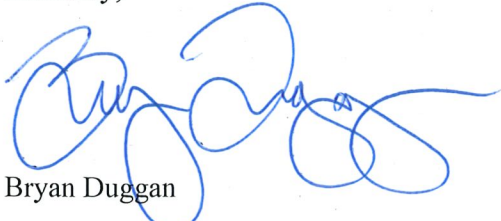
Chapter 4: SWCD Outreach

DEQ acknowledges that limited resources require prioritization of implementation efforts, including outreach and education.

- Outreach efforts to local landowners did not produce any implementation project designs or reportable results despite best efforts for the latest review. DEQ encourages ODA, the SWCD and partners to identify goals for contacting and engaging key landowners and if this work was done, additional information from the SWCD covering their efforts and challenges.

If you have any question or concerns about the enclosed comments, please contact Bryan Duggan at (503) 367-3400, bryan.duggan@deq.oregon.gov.

Sincerely,



Bryan Duggan

DEQ South Coast Basin Coordinator

cc: Gene Foster, DEQ Watersheds Manager
Heather Tugaw, interm DEQ Water Quality Manager
Ryan Michie, DEQ Senior Water Quality Analyst

