



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Eastern Region Bend Office
475 NE Bellevue Drive, Suite 110
Bend, OR 97701
(541) 388-6146
FAX (541) 388-8283
TTY 711

July 15, 2025
Maria Snodgress
Oregon Department of Agriculture
Agricultural Water Quality Program
635 Capitol Street NE
Salem, OR 97301

RE: DEQ Biennial Review Letter – 2025 Middle John Day Agricultural Water Quality Management Area Plan

Dear Maria Snodgress,

Thank you for the opportunity to read and review the draft 2025 Middle John Day Water Quality Management Area Plan (area plan) and participate in the biennial area plan review.

I received the draft plan on February 18, 2025. Thank you for providing the draft with ample time for review and feedback prior to the LAC meeting.

ODA is a Designated Management Agency (DMA) for the John Day Basin Total Maximum Daily Load (TMDL) that applies to the Middle John Day management area. Taking into consideration available water quality information, impairments and TMDLs, the following recommendations for water quality are considered top priorities for the management area:

I. Priority Water Quality Parameters and Recommendations for the Middle John Day.
a. Temperature

Although limited, available temperature monitoring in the management area shows stream temperatures continue to exceed water quality standards (DEQ 2025, Water Quality Status and Trends, preliminary data).

Recommended Actions: Work with landowners in the management area to determine measurable objectives for implementation actions that will improve temperature conditions. These metrics may include specific miles of streamside vegetation planted, and livestock exclusion fencing installed. Implementation priorities should include protecting, maintaining, and establishing streamside vegetation to provide water quality functions to achieve shade targets established in the John Day Basin TMDL.

The management area is limited in available water quality data, as a result, determining the specific locations that would benefit from implementation strategies (i.e. shading) is difficult. DEQ recommends focusing on education and outreach while working with the agriculture community, highlighting how healthy riparian vegetation benefits both the landowners and water quality.

Additional water temperature data collection will aid in determining specific areas that can be focused on for management strategies. Where possible, DEQ encourages additional data collection in the Middle John Day area to help DEQ determine if

improvements are observed in relation to water quality standards and determine where implementation efforts should be focused.

b. Bacteria

Bacteria data in the management area are also limited. There is one site that is meeting water quality standards (DEQ 2025, Water Quality Status and Trends, preliminary data). While this is an encouraging sign, one location is not enough to determine bacteria levels across the management area. The Bacteria TMDL concern areas are primarily on the Upper Mainstem South Fork John Day, but the bacteria TMDL load allocations apply to all streams throughout the basin (DEQ 2010, John Day Basin TMDL). As with temperature, DEQ encourages additional data collection where possible to help determine specific areas where bacteria management strategies should be implemented.

Recommended Action: Management priorities should include consistent implementation of best management practices that can reduce bacterial loading such as reducing animal access to waterbodies, reducing runoff from animal feedlots, prevention of manure from directly or indirectly entering waterbodies, and enhancement of riparian buffer areas.

II. Additional Recommendations

Based on DEQ's review, there are important plan components missing from the draft area plan. Additionally, the plan includes very little information on how management strategies will be implemented and how areas that would benefit the most from implementation will be identified. DEQ requests that the following recommendations be considered and incorporated into the final draft of the area plan.

a. Timelines

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

- Include interim milestones to demonstrate progress towards meeting the measurable objectives.
- Identify ODA's timeline for meeting the TMDL load allocations.

b. Measurable objectives

DEQ recommends that ODA develop measurable objectives associated with priority water quality impairments or concerns, including implementation benchmarks that will help gauge progress in meeting TMDL allocations. The plan improves upon previous versions by including a new management area measurable objective. The objective is to complete targeted amounts of fencing, riparian planting, and seeding by 2029 contingent on funding. This objective is a good start and would be more robust if it included interim milestones as well as a description of sources of funding that will be explored. If goals and objectives need to be revised, an explanation of what was achieved and how to adapt moving forward should be provided. This would demonstrate progress towards trying to achieve water quality goals.

If you have any questions or concerns about the enclosed comments for the Middle John Day Agricultural Management Area, please contact Trea Nance at (971) 263-0841, Trea.Nance@deq.oregon.gov. To facilitate community engagement on water quality within the agricultural water quality management area, this letter will be posted on DEQ's Nonpoint Source Implementation webpage under the Agricultural land tab.

Sincerely,

Trea Nance

Trea Nance
DEQ TMDL Basin Coordinator

cc: Steve Mrazik, DEQ Watersheds Manager
Smita Mehta, DEQ Eastern Region Watershed Manager