



# Oregon

Tina Kotek, Governor

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July 17, 2025  
Brent Smith  
Oregon Department of Agriculture  
Agricultural Water Quality Program  
635 Capitol Street NE  
Salem, OR 97301

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

Dear Brent Smith,

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

I received the draft plan on May 5, 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 North and Middle Forks 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 North and Middle Forks John Day.  
a. Temperature

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). Of the 65 sites assessed for temperature in the management area, 55 are not attaining the standard. Of the 34 with enough data to establish a trend, 9 are degrading, 24 are improving, and 1 had no significant trend.

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.

b. Bacteria

Only one site in the management area had enough data to assess the status in relation to bacteria standards. The location at Kimberly, OR is currently maintaining the standard (DEQ 2025, Water Quality Status and Trends, preliminary data). This is an encouraging sign given the location, however this site has exceeded the standard in the past (DEQ, 2022 [Water Quality Status and Trends](#)). Additionally, the North and Middle Forks area plan highlights bacteria as an issue of Agricultural Water Quality Concern using a larger time period of data, 2001-2020 (Table 4.3.1) As such, given the history of this location,

and the lack of data throughout the rest of the management area, it is difficult to discern if there are persisting bacteria issues in the North and Middle Forks and Bacteria Load allocations apply basin wide.

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. Where possible, DEQ encourages additional monitoring for bacteria in the management area to determine if there are potential areas that would benefit from additional or targeted application of best management practices.

## II. Additional Comments

### b. Measurable objectives

DEQ appreciates the addition of the measurable objective for the North and Middle Fork John Day River Riparian Assessment. This objective includes appropriate milestones, and while it is a large project, it is an excellent example of an objective that aims to address priority water quality impairments. DEQ is happy to provide technical support as ODA and the SWCD work through the milestones. Due to the nature of funding and projects over time, if changes need to be made to the objective and/or milestones, please provide an explanation of what was achieved and how to adapt and move forward should setbacks occur.

### c. Strategic Implementation Areas

SIAs have the potential to show real progress on achieving water quality targets. DEQ appreciates the additional *E. coli* monitoring that is planned in the Camas SIA. This will aid in understanding if there are bacteria issues in this portion of the management area.

This unique area plan incorporates work being performed by three SWCDs in the management area, Monument, Grant, and Umatilla. It is impressive to see the large amount of work occurring in this area and the collaboration across multiple agencies, SWCDs, and watershed councils. If DEQ can assist in any public outreach and education events, please do not hesitate to reach out.

If you have any questions or concerns about the enclosed comments for the North and Middle Forks John Day Agricultural Management Area, please contact Trea Nance at (971) 263-0841, [Trea.Nance@deq.oregon.gov](mailto: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  
DEQ TMDL Basin Coordinator

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