



Oregon

Tina Kotek, Governor

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May 4, 2026

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

RE: DEQ biennial review letter - 2026 Upper Deschutes Agricultural Water Quality Management Area Plan

Dear Nina Caldwell:

Thank you for the opportunity to read the draft 2026 Upper Deschutes Agricultural Water Quality Management Area Plan (area plan) and participate in the biennial area plan review.

The Local Advisory Committee meeting held on April 22, 2026, included presentations by the Oregon Department of Agriculture, Deschutes SWCD, and DEQ.

No TMDLs have been issued in the management area. Taking into consideration available water quality information and impairments, the following recommendations for water quality are considered top priorities for the Upper Deschutes management area:

I. Priority Water Quality Parameters and Recommendations for the Upper Deschutes

a. Temperature

Many assessment units in the management area, including assessment units with agricultural use, are impaired for temperature (year-round criteria). (See the [2022 Integrated Report](#)). However, none of the measurable objectives in the area plan include implementation of activities that improve stream shade.

Recommended Action: Improve stream shade by adding measurable objectives for each riparian vegetation-related conservation practice listed in Table 2.5.2. These objectives can be set to begin after the riparian vegetation assessment is completed in 2027.

b. Sediment and Erosion

Monitoring of total suspended solids is limited in the management area, especially in areas with agricultural use. Agricultural activities can increase sediment and erosion. The area plan includes a measurable objective for reducing flood irrigation, a potential cause of erosion. However, there are other agricultural activities that can also cause sedimentation, turbidity, or elevated total suspended solids.

Recommended Action: Reduce sediment and erosion by adding measurable objectives for each erosion-related conservation practice listed in Table 2.5.2.

c. Bacteria

There are no assessment units in the plan area that are listed for E. coli, but monitoring of E. coli is limited in the area, especially in areas with agricultural use. Agricultural activities related to livestock management can cause exceedances in E. coli. Livestock related agricultural practices occur in this plan area. The area plan includes a measurable objective for reducing flood irrigation, a potential cause of E. coli impairment. However, there are other agricultural activities that can also cause sedimentation, turbidity, or elevated total suspended solids such as livestock access to riparian areas.

Recommended Action: Reduce E. coli by adding measurable objectives for each bacteria-related conservation practice listed in Table 2.5.2.

d. Nutrients

There are no TMDLs in the plan area so there are no established nutrient limits. However, nutrients are often excessive in areas with agricultural use and excessive nutrients may be contributing to the low dissolved oxygen and biocriteria impairments. Also, two public drinking water systems in the area have experienced nitrate alerts. Agricultural activities can cause excessive nutrient runoff and leaching to groundwater. The area plan includes a measurable objective for reducing flood irrigation, a potential cause of nutrient discharge and leaching. However, there are other agricultural practices that can reduce excess nutrients, such as maintaining riparian buffers.

Recommended Action: Reduce nutrient discharge and leaching by adding measurable objectives for each nutrient-related conservation practice listed in Table 2.5.2.

III. Additional Recommendations

DEQ requests that the following recommendations be incorporated into the area plan.

a. Effectiveness monitoring

The current location, frequency, and type of monitoring activities occurring in the area plan area are not sufficient for determining whether progress is being made to achieve the water quality targets and goals in the area. ODA should initiate a project with DEQ to develop a sampling and analysis plan (SAP) to track the effectiveness of this plan over time.

b. Drinking water

Section 2.4 notes that there are drinking water sources in the region but does not provide information that would allow the reader to locate drinking water source areas.

Section 2.4.1.4 mentions contamination from bacteria alerts and elevated nitrate levels at “a handful” of public water systems. More specific information on number and location would benefit the reader’s ability to evaluate these risks.

The plan includes recommended management strategies to protect and restore water quality in the management area which includes source water for public water systems. However, the plan does not currently include information linking management strategies with protection and restoration of drinking water sources.

Best management practices that would benefit the quality of sources of drinking water, including maintaining streamside vegetation and minimizing runoff that contains potential pollutants among others, are included in the plan. However, strategies are not discussed as BMPs to address drinking water source area protection specifically.

c. Coordination with Klamath SWCD

A portion of the area in this area plan occurs in Klamath County. The successful implementation of this plan requires support from the Klamath SWCD.

If you have any question or concerns about the enclosed comments, please contact Smita Mehta at (541) 797-1790, smita.mehta@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, accessed here: [Area Plan Reviews and Comments](#)

Sincerely,

Smita Mehta

Smita Mehta
Deschutes Basin Coordinator

ec: Steve Mrazik, Watersheds Manager, DEQ
Sara Slater, Eastern Region Water Quality Manager, DEQ
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