



# Oregon

Tina Kotek, Governor

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May 2, 2025  
Brent Smith  
Oregon Department of Agriculture  
Agricultural Water Quality Program  
635 Capitol Street NE  
Salem, OR 97301

RE: DEQ Biennial Review Letter – 2025 Upper Mainstem South Fork John Day Agricultural Water Quality Management Area Plan

Dear Brent Smith,

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

I received the draft plan on February 21<sup>st</sup> 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 Upper Mainstem South Fork 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 Upper Mainstem South Fork John Day.
  - a. Temperature

Although limited, available temperature monitoring in the management area shows stream temperatures continue to exceed water quality standards (DEQ 2022, [Water Quality Status and Trends Analysis](#)).

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 Upper Mainstem South Fork 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

While there are areas in the management area that are meeting standards, the monitoring location on the John Day River upstream of Dayville continues to exceed the standard for *E. coli* and is degrading.

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 strongly encourages ODA to continue working with the community to determine the best approach to gathering additional information, acknowledging that there are sensitivities in the community to take into consideration. DEQ is happy to partner with ODA to support education and outreach efforts. DEQ will continue to assist ODA in clarifying that water quality standards will not be modified because they are difficult to attain, and the focus should remain on achieving measurable progress towards achieving standards over time.

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 detailed timelines with interim milestones to demonstrate the length of time expected to achieve 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 measurable objective included in the plan is a good start and efforts should be made over the next six years to determine additional measurable objectives. 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.

c. Strategic Implementation Areas

SIAs have the potential to show real progress on achieving water quality targets. If traditional SIA avenues are not able to be pursued, DEQ encourages ODA to determine

an agreed upon way to prioritize areas for implementation, balancing the concerns of the community while working towards improvements.

If you have any questions or concerns about the enclosed comments for the Upper Mainstem South Fork 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*

Trea Nance  
DEQ TMDL Basin Coordinator

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