



Oregon

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July 16, 2025
Shiloh Simrell
Oregon Department of Agriculture
Agricultural Water Quality Program
635 Capitol Street NE
Salem, OR 97301

RE: DEQ Biennial Review Letter – 2025 Upper Grande Ronde Agricultural Water Quality Management Area Plan

Dear Shiloh,

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

I received the draft plan on April 22, 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 Upper Grande Ronde Total Maximum Daily Load (TMDL) that applies to the Upper Grande Ronde 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 Grande Ronde.

a. Temperature

Available temperature monitoring in the management area shows stream temperatures continue to exceed water quality standards (DEQ, 2022 [Water Quality Status and Trends](#)). Temperature standards are not attaining in 8 out of 12 monitoring stations that were assessed. Of the monitoring locations with enough data to establish a trend, one is improving, and one is degrading.

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 Upper Grande Ronde TMDL.

b. Bacteria

Bacteria data in the management area are limited. All four sites assessed in the management area are attaining water quality standards. While this is an encouraging sign, two of the sites have a degrading trend and one has no significant trend. Therefore, management strategies should still focus on limiting bacteria loading in waterbodies in the management area.

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.

c. Dissolved Oxygen (DO), pH, and Nutrients

The Grande Ronde River and Catherine Creek are listed for pH and DO due to excessive periphyton activity. Efforts to achieve DO and pH standards are dependent on managing agricultural activities to achieve nutrient load allocations. Of the four monitoring locations assessed for DO, four are currently attaining the standard. Of those locations with enough data to establish a trend, all three have no significant trend.

Recommended Actions: Work with landowners in the management area to provide education and outreach materials on preventing nutrients from entering water bodies. The importance of excluding livestock from waterbodies (and providing alternate water sources), effective manure management, and preservation and enhancement of riparian vegetation should be emphasized.

II. Additional Recommendations and Comments

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 appreciates ODA's efforts to begin including more measurable objectives in area plans. Relying on the Oregon Watershed Restoration Inventory (OWRI) to track progress on streamside projects on agricultural lands is helpful but does not provide enough information on the connection to resources ODA or the SWCD provided to those projects, if any. Without those details, it is difficult to see if ODA is making efforts to implement the TMDL or if those projects would have proceeded without ODA resources.

Similarly, while the use and emphasis on increasing enrollment the Conservation Reserve Enhancement Program (CREP) is important, the plan is not clear on the role ODA will play in encouraging enrollment in that program. This objective does provide ways to measure progress over time, but heavily relies on partner entities for progress. DEQ encourages ODA to continue working with the SWCD and landowners to determine potential projects and specific objectives that can be worked towards over time to ensure progress is being made by ODA towards meeting TMDL load allocations.

c. Strategic Implementation Area

The monitoring questions the work in the SIA aims to answer will be beneficial to understanding more about water quality conditions in relation to load allocations assigned in the TMDL. DEQ appreciates ODA's support of monitoring efforts in the SIA.

As ODA continues work in the Upper Grande Ronde Agricultural Water Quality Management Area, DEQ is happy to provide support in education and outreach efforts. DEQ will continue to assist ODA in explaining TMDLs and water quality standards.

If you have any questions or concerns about the enclosed comments for the Upper Grande Ronde 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
DEQ TMDL Basin Coordinator

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