



Oregon

Tina Kotek, Governor

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

RE: DEQ biennial review letter - 2024 Walla Walla Agricultural Water Quality Management Area Plan

Dear Shiloh Simrell:

Thank you for the opportunity to participate in the 2024 Walla Walla Agricultural Water Quality Management Area Plan (area plan) light review.

The Local Advisory Committee meeting held on May 15, 2024 included presentations by the Oregon Department of Agriculture, the Umatilla County Soil and Water Conservation District, the Walla Walla Basin Watershed Council and DEQ.

ODA is a designated management agency for the Walla Walla Subbasin TMDL (2005) that applies to the Walla Walla management area. Taking into consideration available water quality information, impairments and TMDLs, the following recommendations for water quality are considered top priorities for the Walla Walla management area:

I. Priority Water Quality Parameters and Recommendations for the Walla Walla Subbasin
a. Temperature

Continuous temperature monitoring in the management area shows stream temperatures continue to exceed water quality standards (DEQ, 2022 [Water Quality Status and Trends](#)). The status is not attaining in 18 of 19 water monitoring stations that were assessed for temperature.

Recommended Action: Provide measurable results for how implementation actions will achieve temperature standards. 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 and achieve shade targets established in the Walla Walla Subbasin Total Maximum Daily Load (TMDL).

II. Additional Recommendations

Based on DEQ's review, there are important implementation plan components missing from the area plan. DEQ requests that the following recommendations be considered and incorporated into the area plan during the full review in 2026.

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.
- Keep timelines consistent during each area plan review. If timelines require revision, an explanation should be provided.
- 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 objectives included in the plan are not appropriate and are not associated directly with TMDL implementation goals, allocations, and timelines. 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.

- Measurable objectives listed in the area plan use the terms "likely to pollute," reducing erosion to "acceptable rates," these terms are subjective and do not allow for evaluation of progress over time.
- There are several goals established for reducing pollutants by a certain percentage without establishing the original basis for that reduction. Moreover, if the number of operations that are likely to pollute is reduced to "fewer than 5% of livestock operations," there is still the potential for significant loading from the remaining 5%. This is not an appropriate measure to reduce pollutant loading because it is based on the number of operations not the pollutant load itself.
- The RUSLE2 evaluation is no longer able to be used and has caused the baseline establishment to be halted. A determination of how to move forward needs to be established so objective timelines are not moved back. Most of the objectives in this plan are referring to establishing a baseline, but progress has not been made towards this baseline four years into the area plan implementation.

- DEQ is concerned that the method used to establish baselines for Measurable Objectives 1-3 will not be finalized until the 2026 area plan update. This may result in objectives not being established for an additional six years. DEQ recommends ODA meet with the LAC prior to drafting the updates to the area plan to finalize the assessment method and start establishing measurable objectives.

c. Strategic Implementation Areas

SIAs have the potential to show real progress on achieving water quality targets, therefore it is important for area plans to detail the implementation measures taken in these areas.

- DEQ recommends providing detailed descriptions of the types of projects and progress made in the SIAs that result in a tax lot designation being downgraded from Potential Violation or a Compliance Opportunity to Restoration Opportunity or Likely in Compliance.

If you have any question or concerns about the enclosed comments for the Walla Walla 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

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