



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 Umatilla Agricultural Water Quality Management Area Plan

Dear Shiloh Simrell:

Thank you for the opportunity to read the draft 2024 Umatilla Agricultural Water Quality Management Area Plan (area plan) and participate in the biennial area plan review.

I received the draft plan on 12/8/23. Thank you for providing the draft with ample time for review and feedback prior to the LAC meeting.

ODA is a designated management agency for the Umatilla Basin Total Maximum Daily Load (TMDL) that applies to the Umatilla management area. Taking into consideration available water quality information, impairments and TMDLs, the following recommendations for water quality are considered top priorities for the Umatilla management area:

I. Priority Water Quality Parameters and Recommendations for the Umatilla

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 for 3 out of 4 water monitoring stations that were assessed for temperature. The one station that is meeting the temperature standard, has a degrading trend.

Recommended Action: Provide measurable results for how implementation actions will achieve temperature standards. These metrics may include specific miles of streamside vegetation planted, livestock exclusion fencing installed, and the progress on shade targets of maturing, restored riparian areas. Implementation priorities should continue to include protecting, maintaining, and establishing streamside vegetation to provide water quality functions and achieve shade targets established in the Umatilla Basin TMDL.

b. Sediment and erosion

Nine stations were assessed for Total Suspended Solids (TSS) in the management area, of those 5 were not attaining.

Recommended Action: Implementation priorities should include management of riparian areas, irrigation practices that prevent erosion and promote growth of riparian vegetation, and livestock and grazing best management practices to achieve external loading reduction targets in the Umatilla Basin TMDL.

c. Bacteria

Although most sites assessed for bacteria were attaining, both the Westland Road and Yoakum Bridge sites show degrading trends.

Recommended Action: Implementation 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 implementation plan components missing from the draft area plan. 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.
- Keep timelines consistent during each area plan review. Moving timelines and goals back each review makes measuring progress impossible. 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. At the time of my review, the measurable objectives included in the plan were not associated with TMDL implementation goals, allocations, and timelines. The measurable objectives that are included in the plan have been in place for several review cycles and have not demonstrated progress towards achieving water quality goals.

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 Umatilla Area Plan, please contact Mandy Ondrick at (503) 568-5907, Amanda.Ondrick@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,

Mandy Ondrick
Eastern Region TMDL specialist

ec: Steve Mrazik, DEQ Watersheds Manager
Smita Mehta, DEQ Eastern Region Water Quality Manager