



Oregon

Tina Kotek, Governor

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

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

Dear Theresa DeBardelaben:

Thank you for the opportunity to read the draft 2024 Willow Creek 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 Willow Creek Subbasin TMDL that applies to the Willow Creek management area. Taking into consideration available water quality information, impairments and TMDLs, the following recommendations for water quality are considered top priorities for the Willow Creek management area:

I. Priority Water Quality Parameters and Recommendations for Willow Creek

a. Temperature

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

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 Willow Creek Subbasin Total Maximum Daily Load (TMDL).

b. Bacteria

While there have been improvements at several sampling sites in the management area, Willow Creek from the Rhea Creek sampling site to the NW Gale Street Bridge sampling site continues to exceed water quality standards for E. coli.

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 for objectives 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. 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.

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 Willow Creek 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