



Oregon

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December 2, 2025
Brent Smith
Oregon Department of Agriculture
Agricultural Water Quality Program
635 Capitol Street NE
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RE: DEQ Biennial Review Letter – 2025 Lower John Day Agricultural Water Quality Management Area Plan

Dear Brent,

Thank you for the opportunity to participate in the biennial area plan review for the Lower John Day Agricultural Water Quality Management Area on October 1, 2025.

ODA is a Designated Management Agency (DMA) for the John Day Basin Total Maximum Daily Load (TMDL) that applies to the Lower John Day 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 Lower John Day.

a. Temperature

Available temperature monitoring in the management area shows stream temperatures continue to exceed water quality standards with only 5 of 15 sites assessed meeting temperature standards (DEQ 2025, Water Quality Status and Trends, preliminary data 2019-2023).

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.

b. Bacteria

Bacteria data in the management area are limited. There is one site of the two assessed that is meeting the bacteria standard (DEQ 2025, Water Quality Status and Trends, preliminary data). The Bacteria TMDL concern areas are primarily on the Upper Mainstem South Fork John Day, but the bacteria TMDL load allocations apply to all streams throughout the basin (DEQ 2010, John Day Basin TMDL). DEQ encourages additional data collection where possible to help determine specific areas where bacteria management strategies should be implemented.

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 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 next update 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 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," and "likely provides the full suite of water quality functions." These terms are subjective and do not allow for evaluation of progress over time.

During the next plan update, the next steps in Measurable Objective #3 should be outlined in milestones to show the path to make progress towards improving streamside vegetation conditions in agricultural areas. The current objective shows the assessment process and results but does not indicate how the results are used to improve conditions and what methods will be used.

If you have any questions or concerns about the enclosed comments for the Lower John Day 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

Trea Nance
DEQ TMDL Basin Coordinator

cc: Steve Mrazik, DEQ Watersheds Manager
Sara Slater, DEQ Eastern Region Watershed Manager