



# Oregon

Tina Kotek, Governor

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December 2, 2025  
Shiloh Simrell  
Oregon Department of Agriculture  
Agricultural Water Quality Program  
635 Capitol Street NE  
Salem, OR 97301

RE: DEQ Biennial Review Letter – 2025 Wallowa Agricultural Water Quality Management Area Plan

Dear Shiloh,

Thank you for the opportunity to participate in the biennial area plan review on November 6, 2025.

ODA is a Designated Management Agency (DMA) for the Lower Grande Ronde Total Maximum Daily Load (TMDL) that applies to the Wallowa 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 Wallowa management area.

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 being attained in 42 out of 52 monitoring stations that were assessed. Of the monitoring locations with enough data to establish a trend, nine are improving, two are degrading, and three have no significant trend.

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 Lower Grande Ronde TMDL.

b. Bacteria

Bacteria data in the management area are limited. According to the 2022 [EPA Approved Integrated Report](#), there are still impairments for bacteria for sections of the Lostine and Wallowa Rivers and Spring and Prairie Creeks. Assessments for bacteria were not available for this management area in the 2022 Status and Trends Report.

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)

Sections of the Lostine River and Prairie Creek are listed as impaired for DO. Per the 2022 Status and Trends Report, the two sites assessed for DO are currently attaining the standard. The two sites had no significant trend (not improving or degrading).

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 current 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 revision 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.
- 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.

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 Wallowa 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 Wallowa Agricultural Management Area, please contact Trea Nance at (971) 263-0841, [Trea.Nance@deq.oregon.gov](mailto: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  
Sara Slater, DEQ Eastern Region Watershed Manager