

Biennial Review Request for Comments From DEQ (revised 12-30-14)

"The State Department of Agriculture and the State Board of Agriculture shall consult with the Department of Environmental Quality or the Environmental Quality Commission in the adoption and review of water quality management plans and in the adoption of rules to implement the plans." ORS 568.930(2)

Survey Checklist for **South Santiam Area Plan**

DEQ Basin Coordinator: **Pamela Wright**

Date: January 30, 2015

(If answered "no", please provide information and/or example language)

I. Area Plan Content

A. Issue identification

1. Does the Area Plan include all water quality limited water bodies, including 303(d) listed and with approved TMDLs?
DEQ COMMENT: Yes
2. Does the Area Plan adequately reflect current TMDL status?
DEQ COMMENT: Yes.
3. Does the Area Plan sufficiently present the TMDL load allocation that it is intended to address?
DEQ COMMENT: Yes.
4. Does the Area Plan adequately include items from applicable Groundwater Management Area Action Plans?
DEQ COMMENT: Yes, I think so.
5. Does the Area Plan present the requirements of Coastal Zone Management Act applicable to agriculture?
DEQ COMMENT: Not applicable.
6. Does the Area Plan include sufficient items from the State of Oregon; Pesticide Management Plan for Water Quality Protection?
DEQ COMMENT: I believe the South Santiam would be an excellent area for a Pesticide Stewardship Partnership. The SWCD staff and Watershed Councils are technically skilled and have good relationships with landowners. I suggest pursuing that.

ODA Response: This recommendation has been passed along to Water Quality Pesticide Management Team for consideration.
7. Does the Area Plan sufficiently address the needs in drinking water source areas related to agricultural pollution sources within the geographic area of the plan?
DEQ COMMENT: No comment.

B. Goals and Objectives:

1. Do the goals and objectives of the Area Plan clearly state that the purpose of the Area Plan is to prevent and control water pollution and to meet water quality standards?

DEQ COMMENT: It is getting much better.

2. Does the Area Plan include clear and measurable objectives that are designed to meet water quality standards and TMDL load allocations?

DEQ COMMENT: It is getting much better.

C. Strategies to Meet Water Quality Goals and Track Progress

1. Are geographic and/or water quality issue priorities listed in the Area Plan consistent with TMDL and GWMA priorities?

DEQ COMMENT: I'm not sure. The two agencies work more closely together to address contamination of surface water by groundwater in the GWMA.

ODA RESPONSE: ODA continues to work with the LAC and SWCD on a path of continual improvement and adaptive management.

The GWMA sections of the Area Plan have been updated to provide the most recent information available and a link is provided for the GWMA Action Plan.

2. Are geographic scales and implementation actions identified in the Area Plan appropriate to track implementation, progress, and effectiveness?

DEQ COMMENT: It could be better. I am encouraged that the LAC has interest in monitoring data.

ODA RESPONSE: ODA will continue to work with the LAC and SWCD to improve measurable objectives over time.

3. If applicable, is the Watershed Approach Action Plan addressed?

DEQ COMMENT: No, but we will discuss that in the near future.

ODA RESPONSE: Although a Watershed Approach Action Plan is not applicable at this time, ODA looks forward to discussing this in the future.

4. Does the Area Plan provide sound evidence or reasons why implementation actions could lead to pollution reduction? If some of the implementation actions are not consistent with TMDL and other WQ goals, explain why those practices do not contribute toward meeting those WQ goals.

DEQ COMMENT: I think the goals are in the Plan.

5. Does the Area Plan include timelines, schedules, and measurable milestones that are consistent with the TMDL WQMP?

DEQ COMMENT: Not as clearly as I would like. We will discuss that.

ODA RESPONSE: ODA's priority for this biennial review was to work with the LAC and the SWCD to convert the Area Plan to a new template format to be utilized across Oregon. We accomplished that task. ODA will work with the LAC and the SWCD to prioritize Measurable Objectives at the next biennial review. This will be an iterative process based on continual review and adaptive management.

6. Is monitoring adequate to determine whether progress is being made to achieve the goals of the plan? If no, are monitoring needs identified and is there a strategy to meet those needs?

DEQ COMMENT: More monitoring needs have been identified. I'm not sure the information has been passed along as ODA staff has changed. We are planning to discuss this.

ODA RESPONSE: The Area Plan is updated to provide information about past and current monitoring efforts. Our collective ability to report results will improve over time.

II. Implementation/evaluation

- A. Are voluntary efforts sufficient to implement the Area Plan or are additional incentives needed to increase the rate of participation?

DEQ COMMENT: I am not sure. I think more and better partnerships are needed in the South Santiam Ag Plan area.

ODA COMMENT: ODA believes that the voluntary efforts continue to be sufficient to implement the Plan. In an effort to better measure the impacts of voluntary efforts, ODA is working with SWCDs around the state to implement Focus Areas. In the South Santiam Management Area, work has begun within the Crabtree Creek Focus Area. The pre-assessment has been initiated and work with landowners to voluntarily complete projects is underway. A post-assessment will be completed and at that time an evaluation of the work can be conducted. Lessons learned from this first experience can be applied in the next Focus Area.

- B. Are milestones and timelines established for Area Plans achieving the goal of the Program?

DEQ COMMENT: It could be more complete.

ODA COMMENT: As noted above, ODA's priority for this biennial review was to work with the LAC and the SWCD to convert the Area Plan to a new template format to be utilized across Oregon. We accomplished that task. ODA will work with the LAC and the SWCD to prioritize Measurable Objectives at the next biennial review. This will be an iterative process based on continual review and adaptive management.

- C. Is reasonable progress being made towards accomplishing milestones and timelines in the Area Plan?

DEQ COMMENT: I am not sure. The progress has not been put in a context that allows the reader to determine how much progress has been made vs. how much needs to be done.

ODA COMMENT: Please see our previous response, above.

III. Area Rules

- A. Are the prohibited conditions likely to be effective in making reasonable progress towards meeting state water quality goals?

DEQ COMMENT: I am not sure.

ODA RESPONSE: ODA believes the prohibited conditions are effective at describing the measures necessary to prevent and control water pollution. In addition, ODA has initiated the Strategic Implementation Area (SIA) effort in Oregon. SIAs are ODA-identified watersheds where more compliance may be needed. As of this date, two test SIAs are almost completed, and ODA will identify at least six additional SIAs for the year 2015-2016.

- B. Are additional prohibited conditions or other mandatory control measures needed?

DEQ COMMENT: The Plan just needs to be implemented.

ODA RESPONSE: ODA continues to work with the LAC, SWCD, and our partners to successfully implement the Area Plan, measure change, and make adjustments.