

Lon and Sheri Wadekamper  
LGW Ranch  
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Hermiston, OR 97838  
541-567-3876

February 15, 2011

Andrea Matzke  
Oregon Department of Environmental Quality  
Water Quality Division  
811 SW 6<sup>th</sup> Avenue  
Portland, OR 97204

Dear Ms. Matzke,

LGW Ranch is a family owned and operated cow/calf operation on 700 deeded acres along the west bank of the Umatilla River near Hermiston, Oregon. We have been farming and ranching in the Westland area for forty years. Our ranch is divided into 40 to 50 acre paddocks for intensive, rotational grazing of our livestock.

Since Senate Bill 1010 passed in 1993, we have attended many conferences and seminars where the Oregon Department of Agriculture (ODA) has instructed and advised ranchers on measures and practices to implement to comply with clean water regulations. Since that time LGW Ranch has installed off-stream watering sites on nearly all of these paddocks. LGW Ranch employs every best management practice that is economically feasible including soil testing, spot spraying pesticides for weeds, and application of liquid fertilizer through irrigation systems. We believe these measures and others taken under Water Quality Management Area Plans have significantly improved water quality in Oregon as it relates to pollution from non-point agriculture sources.

We are very concerned about increased regulation and adverse impacts to production agriculture from the proposed Human Health Toxic Pollutants rules. We support the formal comments and suggested rule language changes submitted by the Oregon Farm Bureau. OFB's suggested changes seek to maintain Oregon's water quality standards while keeping farm families and ranchers viable.

ODA has performed well in obtaining Total Maximum Daily Load (TMDL) compliance through Water Quality Management Area Plans, Confined Animal Feeding Operation (CAFO) enforcement, and education programs held in conjunction with Oregon State University Extension Service. Since agriculture is their area of expertise, ODA should continue to be the sole authority regulating farm practices and adopting rules regarding water quality protection.

In our own experience, however, the Oregon Department of Environmental Quality (DEQ) is not doing an acceptable job managing TMDLs in the Umatilla River with point source polluters. DEQ recently issued Mutual Agreement and Orders (MAOs) to the cities of Echo and

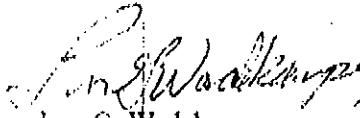
Hermiston allowing them to dump class "C" water in to the river for the next two irrigation seasons when better environmental options are available.


For nearly twenty years LGW Ranch has land applied class "C" water from Hermiston's Waste Water Treatment Plant (WWTP). LGW's pastures and hay lands have utilized the ammonia, nitrate and phosphate components of this effluent and allowed cool, filtered return flows to the river that benefit fish and water quality. Our contract with the City contained extension provisions to continue land application of the City's effluent on LGW Ranch but the City chose to discontinue effluent delivery when the DEQ's MAO allowed direct discharge of Class "C" effluent to the Umatilla River year around through August 31, 2012. In their 2007 evaluation report on Hermiston's WWTP, DEQ described Hermiston's effluent as "the source of ammonia standard violations in the Umatilla River".

We are disheartened that successful land application of effluent is being disregarded and believe the DEQ is issuing MAOs of this nature in error. Agriculture is being blamed for diminished water quality unjustly, while point source polluters are allowed to contaminate rivers with ammonia laden effluent.

We are proud to be good stewards of the land and LGW Ranch will continue to improve and enhance the ranch's systems and practices for the benefit of water quality in Oregon.

Sincerely,

  
Lon G. Wadekamper

  
Sheri Wadekamper