

December 12, 2025

Jennifer Wigal  
Water Quality Administrator  
Oregon Department of Environmental Quality

Cc: Dacia Mosso, Tetra Tech

Dear Ms. Wigal,

The undersigned organizations are submitting this letter in lieu of completing the recent survey we received as part of Oregon Department of Environmental Quality's efforts to develop a Nutrient Strategy. While we are interested in providing our feedback, the survey that was sent out for organizations does not target the regulated community and associated organizations, and the questions do not align with our work and the ways we engage with DEQ around nutrient pollution prevention and reduction efforts.

As you know, our organizations are engaged on topics related to nutrient pollution prevention and reduction largely on a policy level, working to ensure that new proposed laws and regulations are science-based, practical, and cost-effective for our members and the broader natural resource sector. Our organizations share many common priorities, the most important of which is to ensure science-based policies that protect against environmental impacts while also sustaining Oregon's robust and important natural resource sector into the future.

We would appreciate a formal opportunity to provide our input into this process, within a timeframe that allows for more thorough engagement. In the meantime, we would like to provide the following feedback related to some of the questions and themes of the survey.

A large portion of the survey focuses on challenges and gaps with communication, engagement, and collaboration with DEQ related to nutrient pollution prevention and reduction efforts. Thus, we would like to highlight several relevant challenges that relate to our organizations' experiences with communication, engagement, and collaboration with the agency, including: 1) DEQ's lack of expertise related to primary production industries (agriculture, forestry) and the associated management practices of various industries; 2) DEQ's lack of a consistent, transparent, and robust scientific process, and 3) weak efforts at communication and engagement with the natural resource sector and the regulated community.

DEQ's lack of expertise related to production industries is highlighted even in this survey, which lists the commercial forestry sector as a contributor to nutrient pollution in the state. We are not aware of any reasonable connection between forest management practices and nutrient pollution, yet survey participants are led to draw conclusions about how well DEQ is managing nutrient pollution from this sector.

Compounding the issues around expertise and scientific process, our experience engaging on many regulatory issues related to both ground and surface water (TMDLs, PSP, groundwater contamination) is that DEQ is not receptive to feedback, even when it comes directly from the scientific community or has been reviewed through an academic peer-review process. There are many instances where the science behind a DEQ decision or action has been taken out of its original context or has not been through an appropriate vetting process such as peer-review.

Our recommendation is for DEQ to develop an agency-wide policy outlining adherence to established scientific protocols and emphasizing the need for transparency and strong scientific justification regarding agency assumptions and decisions. This includes reliance on strong peer-reviewed science from reputable sources. DEQ should also prioritize relationship and trust building with the regulated community and make meaningful efforts to become educated on industry practices that impact the agency's work, including non-regulatory efforts such as this outreach effort. Finally, DEQ should consult with and defer to other agencies (such as Oregon Department of Agriculture and Oregon Department of Forestry) for industry-specific expertise as it relates to various agency actions and decisions.

As DEQ moves through this process, we want to stress the importance of 1) data-and science-driven policies and actions including third-party scientific review; 2) a focus on addressing and remediating legacy contamination through efforts such as aquifer recharge; and 3) ensuring practical solutions that support continued food and fiber production in the state.

Again, we would appreciate a more formal opportunity to participate in this survey process, which has targeted the general public and certain organizations, but not the regulated community or the policy organizations working on their behalf. Thank you for including our feedback in your process.

Sincerely,

Oregonians for Food & Shelter  
Oregon Association of Nurseries  
Oregon Dairy Farmers Association  
Oregon Farm Bureau  
Oregon Forest Industries Council  
Oregon Seed Council  
Oregon Water Resources Congress  
Northeast Oregon Water Association  
Water for Eastern Oregon