

Annual Report 2025

OREGON NITRATE REDUCTION PLAN

for the Lower Umatilla Basin Groundwater Management Area

Office of Governor Tina Kotek
Oregon Department of Environmental Quality
Oregon Department of Agriculture
Oregon Water Resources Department
Oregon Health Authority

January 30, 2026



State of Oregon
Nitrate Reduction Plan for the
Lower Umatilla Basin Groundwater Management Area

Annual Report for 2025

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Executive Summary

The [Oregon Nitrate Reduction Plan](#) for the Lower Umatilla Basin Groundwater Management Area (LUBGWMA) represents an unprecedented collaborative effort across four state agencies working with the U.S. Environmental Protection Agency, the Confederated Tribes of the Umatilla Indian Reservation, Morrow and Umatilla counties, local governments, businesses, residents, and community groups. Superseding previous LUBGWMA Action Plans, this report details progress from the first year of implementation.

In 2025, state agencies prioritized permitting oversight improvements, facility infrastructure upgrades, and operational changes to reduce nitrate contamination risks in groundwater and drinking water sources. A phased implementation approach enables facilities to transition practices while agencies monitor progress toward long-term groundwater protection.

The Oregon Department of Agriculture's (ODA) Agriculture Water Quality Program made significant progress towards establishing new groundwater protection rules for irrigated agriculture operations in the LUBGWMA. The program established and engaged a rules advisory committee, filed the proposed rules, and completed the public comment process, including multiple public outreach events and hearing opportunities. The program will be reviewing the comments received and making any final revisions before filing permanent rules in early 2026.

Routine monitoring and oversight of 11 permitted Confined Animal Feeding Operations (CAFOs) showed continued advancement, with 90% found to be in compliance during routine inspections. Key permitting processes progressed through EPA coordination, public engagement, and input from other interested parties.

The Oregon Department of Environmental Quality (DEQ) required and enforced wastewater permit conditions that better protect groundwater, including phasing out winter irrigation, expanded monitoring and reporting, and facility infrastructure upgrades. Four facilities in the area are under DEQ orders or compliance schedules, and all remained on track to meet their requirements and milestones.

The Oregon Water Resources Department (OWRD) launched a comprehensive backflow education and inspection program in early 2025. While this program has been in place for roughly 30 years, OWRD committed to inspecting every well within the LUBGWMA to ensure that a functioning backflow device was installed on irrigation systems that use groundwater and inject chemicals or fertilizers into the irrigation system. Staff from OWRD conducted over 750 inspections at 660 sites throughout the LUBGWMA. At the beginning of the irrigation season,

nearly none of the inspected irrigation systems were fully in compliance – by the end of September, over 99% of these sites were in compliance.

The U.S. EPA worked with state agency data to develop a draft LUB Data Hub—a GIS platform that compiles and displays land use and groundwater data from DEQ, OWRD, ODA, and CTUIR. State agencies are working with Oregon State University's Oregon Explorer program to refine and publish a beta version of the platform in 2026. The goal is to have a publicly accessible tool to increase understanding of groundwater quality in the basin and inform planning and management decisions. DEQ, ODA, and OWRD have also established a technical workgroup to coordinate data needs and identify knowledge gaps. Understanding contributions from agriculture, septic systems, and other sources enables targeted, science-based strategies for drinking water protection.

The Oregon Health Authority (OHA) strengthened LUBGWMA partnerships in 2025 by hiring a bilingual local coordinator, streamlining meetings based on partner feedback, and expanding Spanish-language engagement spaces. OHA increased funding to local health departments for water sampling and opened a new grant cycle for community organizations. A consultant assessment identified relationship gaps and communication needs, prompting ongoing dialogue and operational improvements to enhance collaborative efforts and community outreach effectiveness.

While significant work remains, this first year has established the regulatory framework, coordination mechanisms, and monitoring systems necessary for measurable progress. The partnerships and adaptive management processes developed during this period provide a strong foundation for achieving the Oregon Nitrate Reduction Plan's ultimate, long-term goal: ensuring safe, reliable drinking water for all communities in the LUBGWMA.

Reporting Agencies

Each strategy in the Nitrate Reduction Plan has a lead state agency responsible for implementation, monitoring, and reporting. The list below identifies the strategies associated with each lead agency.

Oregon Department of Agriculture (ODA)

4.2 Irrigated Agriculture

- 4.2.3.1 Agricultural Water Quality Program
- 4.2.3.2 Strategic Implementation Area
- 4.2.3.3 Best Management Practices (BMP) for Nutrient and Irrigation Management
- 4.2.3.4 Fertilizer Registration Program

4.3 Confined Animal Feeding Operations

- 4.3.3.1 Confined Animal Feeding Operations Compliance

4.4 Livestock Grazing

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- 4.4.3.2 Inventory of Livestock Operations
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- 4.6.3.1 Agricultural Water Quality Program

Oregon Department of Environmental Quality (DEQ)

4.5 Land Application of Industrial and Domestic Wastewater

- 4.5.3.1 Wastewater Permitting and Compliance

4.6 Rural Residential

- 4.6.3.2 Onsite Septic System Permitting and Compliance
- 4.6.3.3 Onsite Septic System Repair and Replacement Funding
- 4.6.3.4 Public Wastewater Treatment System and Irrigation Modernization Funding

5. Monitoring, Data, and Analysis

- 5.1.1 Groundwater Quality Sampling and Monitoring
- 5.1.2 Groundwater Quality Trends Analysis
- 5.1.5 Nitrate Leaching Estimation Update
- 5.2 Groundwater Data Coordination Effort and GIS Platform

Oregon Water Resources Department (OWRD)

4.2 Irrigated Agriculture

- 4.2.3.5 Irrigation Fertilizer Backflow Prevention - NEW

4.6 Rural Residential

- 4.6.3.5 Domestic Well Construction and Compliance

5. Monitoring, Data, and Analysis

- 5.1.3 Hydrogeology of the Lower Umatilla Basin - Update of Conceptual Model
- 5.1.4 Ongoing Groundwater Levels Data Collection

Oregon Health Authority (OHA)

6.1 Immediate Safe Drinking Water Services

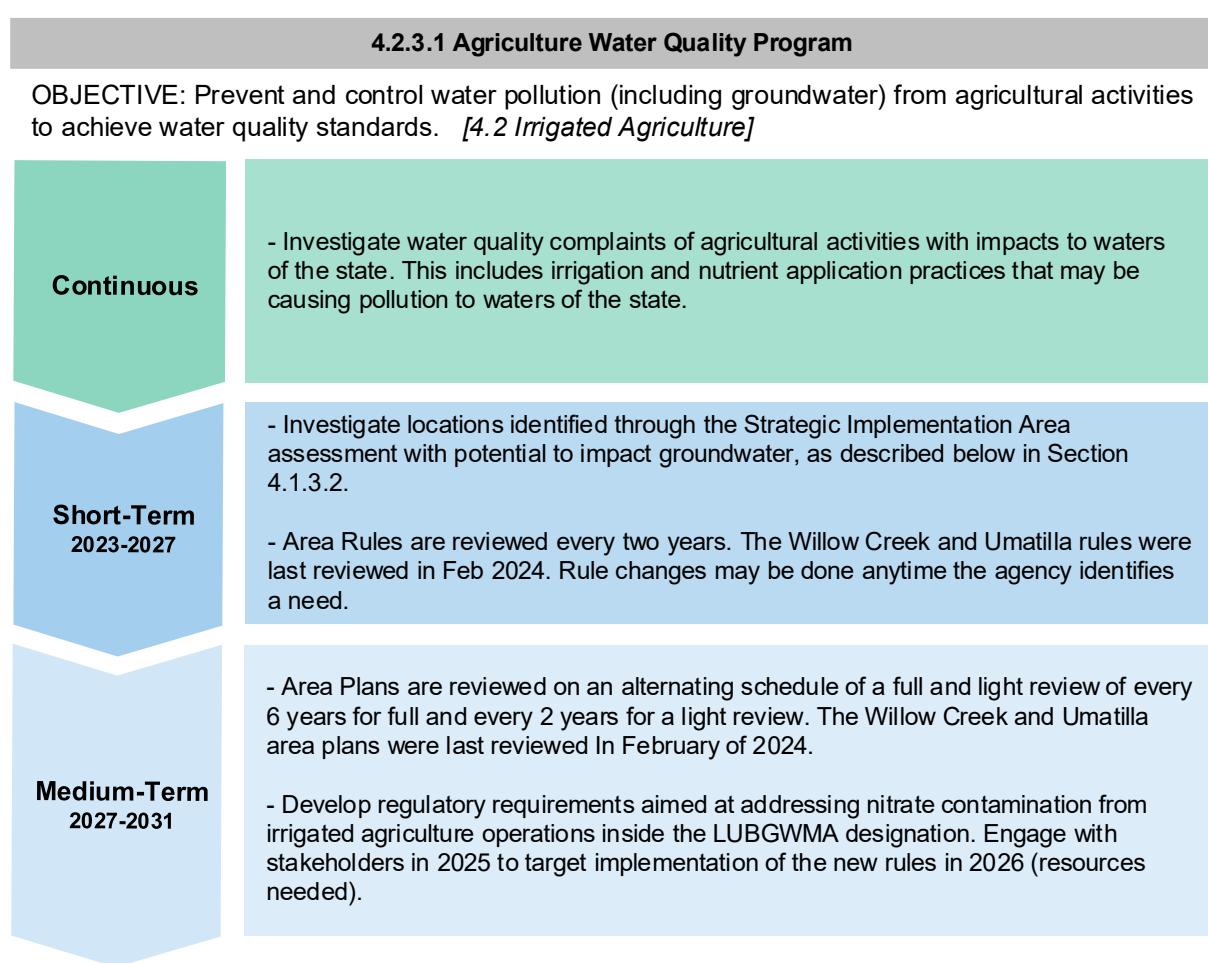
- 6.1.3.1 Community Education, Outreach and Engagement About Nitrate in Domestic Well Water
- 6.1.3.2 Free Initial Domestic Well Water Testing
- 6.1.3.3 Free Domestic Well Water Retesting
- 6.1.3.4 Free Kitchen-Tap Treatment System Installation and Maintenance
- 6.1.3.5 Free Water Delivery
- 6.1.3.6 Longer Term Water Provisioning for Households Above 25 mg/L
- 6.1.3.7 Data and Data Management
- 6.1.3.8 Community Partner Relations
- 6.1.3.9 Demographic Study

6.2 Intermediate Term Public Water Systems Solutions

- 6.2.3.1 Technical and Funding Assistance for Public Water System Extension and Creation
- 6.2.3.2 Identifying Public Water Systems Not Currently under OHA Oversight

4.2 Irrigated Agriculture

4.2.3.1 Agricultural Water Quality Program



Monitoring Progress:

The AGWQ program tracks and reports on the number and types of compliance actions taken and receives reports from SWCDs on the achievements made to implement area plans. This data will be used to track trends of enforcement activities and engagement of area agriculture producers on achieving nitrate reductions from ag activities.

- Annual AGWQ Compliance Program Report
 - Compliance cases investigated
 - Type of Issues
 - Pre-enforcement actions
 - Enforcement actions
- Ag Water Quality Management Area SWCD Biennial Review Reports.
 - Landowner participation in outreach events
 - Landowners provided technical assistance
 - Site visits

- Conservation plans written
- Funding applications submitted
- Funding applications awarded

Progress Summary for 2025:

The AGWQ program made major strides in accomplishing the goal of establishing new groundwater protection rules for irrigated agriculture operations in the LUBGWMA. The agricultural water quality rules advisory committee (RAC) for the LUBGWMA concluded its work, holding seven meetings in 2025 and proposed rules were filed with the Oregon Secretary of State's office for public comment.

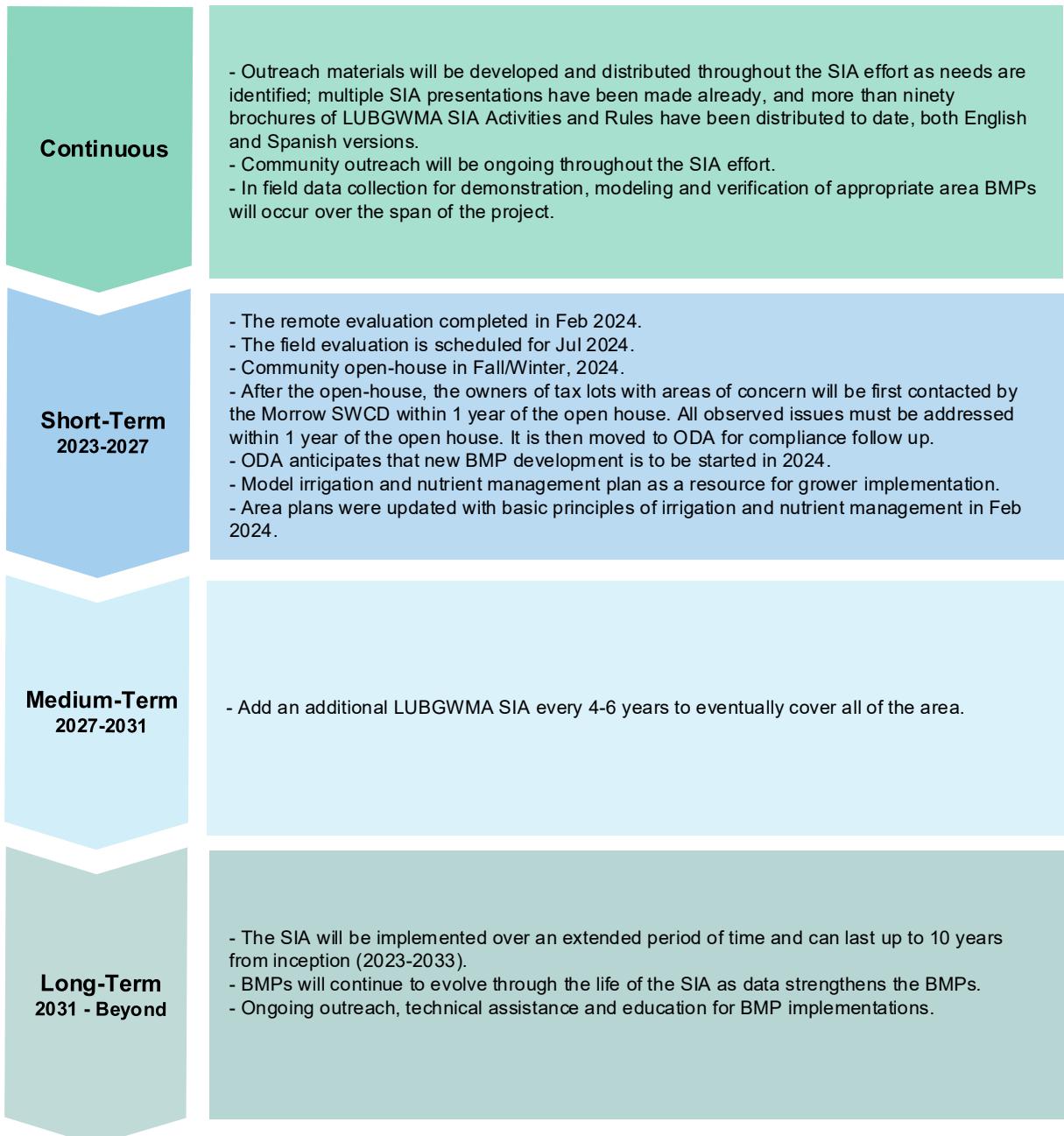
ODA held two informational meetings for the public to provide a detailed summary of the information contained within the draft rules. ODA also held two public hearings, one scheduled in conjunction with an informational session, to receive feedback and comments from the public on the draft rules. About eighty members of the public interacted with ODA during the three meetings. The public comment period for the proposed rules closed on December 22, 2025. ODA is now working to address the comments received and make any final changes based on comments before filing the permanent rules. ODA anticipates having the response to comments completed and the permanent rules filed sometime in the first quarter of 2026.

ODA opened five compliance cases in the LUBGWMA to address agricultural water quality concerns. Three of these cases have been closed by ODA with successful outcomes. The other two cases have a scheduled follow-up to be completed in 2026.

4.2.3.2 Strategic Implementation Area

4.2.3.2 Strategic Implementation Area

OBJECTIVE: The Strategic Implementation Area (SIA) initiative is a proactive effort to conduct outreach in the LUBGWMA regarding agricultural water quality rules, develop irrigated agriculture Best Management Practices (BMPs), and emphasize the utilization of irrigation and nutrient management plans to protect groundwater. Achieve 100% compliance with agricultural water quality rules within the SIA, therefore preventing pollution of waters of the state. Repeat the SIA process as needed for other areas of the LUBGWMA. *[4.2 Irrigated Agriculture]*



Monitoring Progress:

There are a number of data points that are collected through the SIA process to evaluate impacts and success of the SIA overall. This data will also be collected for the LUBGWMA SIA to track performance over time.

- Acres evaluated
- Types of issues identified
- Landowners contacted
- Landowners participating in outreach events
- Landowners provided information
- Technical assistance provided to landowners
- Grant Funding applications for landowners
- Compliance data, tax lots/fields that are:
 - Likely in Compliance (LC)
 - Restoration Opportunity (RO)
 - Compliance Opportunity (CO)
 - Potential Violation (PV)

Progress Summary for 2025:

The AGWQ program conducted extensive outreach to agricultural landowners within the LUBGWMA this year; providing feedback on results of a remote evaluation to the observable condition of land as it pertains to ag water quality standards and laws. In 2025, ODA sent out 279 letters to irrigated agriculture and/or livestock operations documenting either likely compliance or the potential for minor restoration opportunities. ODA sent 20 additional letters to landowners identifying potential concerns to water quality resulting from management actions within their operations. Those landowners also received information on how to work with the local SWCD to address those concerns observed by ODA.

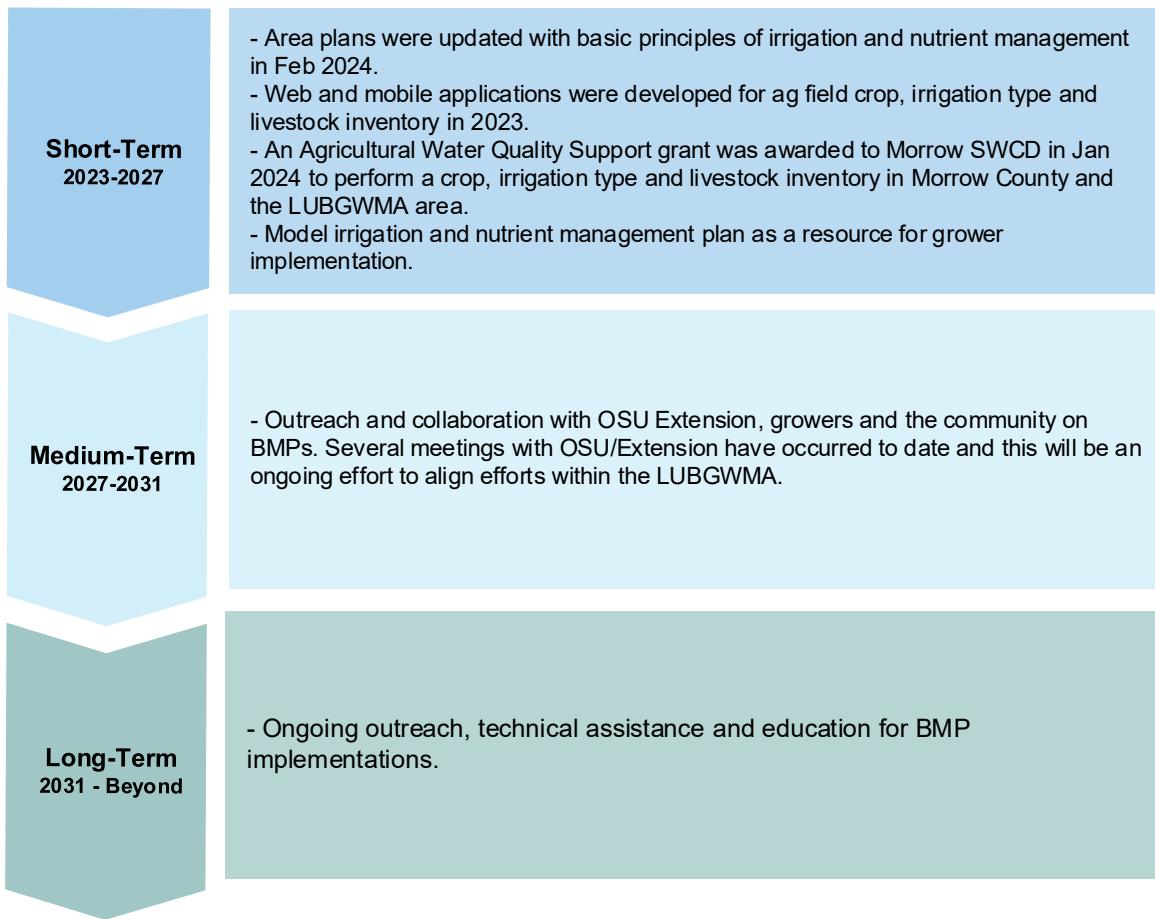
The AGWQ compliance staff conducted seven site visits to operations flagged as potential violations during the initial SIA remote conditions evaluation. Additionally, two DEQ permitted operations were identified as having potential compliance opportunities, which resulted in a collaborative meeting between representatives of both ODA and DEQ, during which those observed concerns were addressed.

In 2025, the Morrow County SWCD completed six site visits to provide technical assistance to landowners identified as having potential concerns to water quality. Further, the SWCD began outreach to nine additional landowners to provide similar technical assistance, which will continue in 2026. This year the SWCD has also agreed to the development of a new SIA that will be developed in 2026.

4.2.3.3 Best Management Practices (BMP) for Nutrient and Irrigation Management

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OBJECTIVE: Use irrigation and crop nutrient management data to develop BMPs. Conduct outreach and support for implementations of model irrigation and nutrient management model plans. [4.2 *Irrigated Agriculture*]



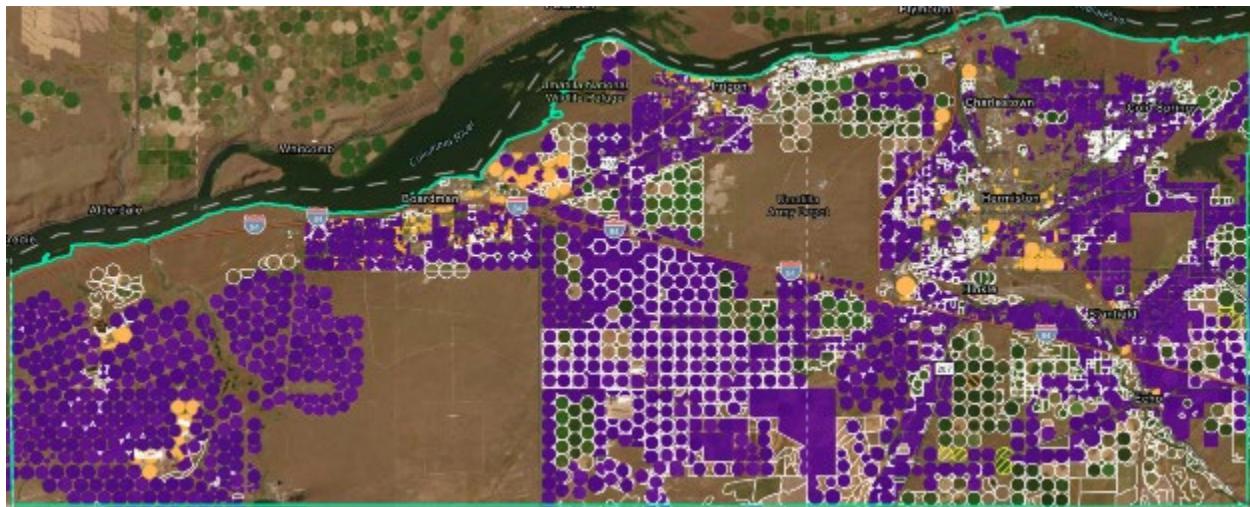
Monitoring Progress:

- This is a collaborative project with partners, progress will be shown in the number of collaborative activities between parties. Additional resources needed.

Progress Summary for 2025:

The Morrow County SWCD conducted and completed its part of a visual inventory of agricultural fields within the LUBGWMA. This inventory included an evaluation of crop type, rotation crop if known, crop stage, and irrigation type. This data along with number and size of fields, location and soils will help prioritize outreach and BMP efforts in the area. Several large-scale corporate farms provided data to the SWCD digitally to aid in the completion of this inventory work.

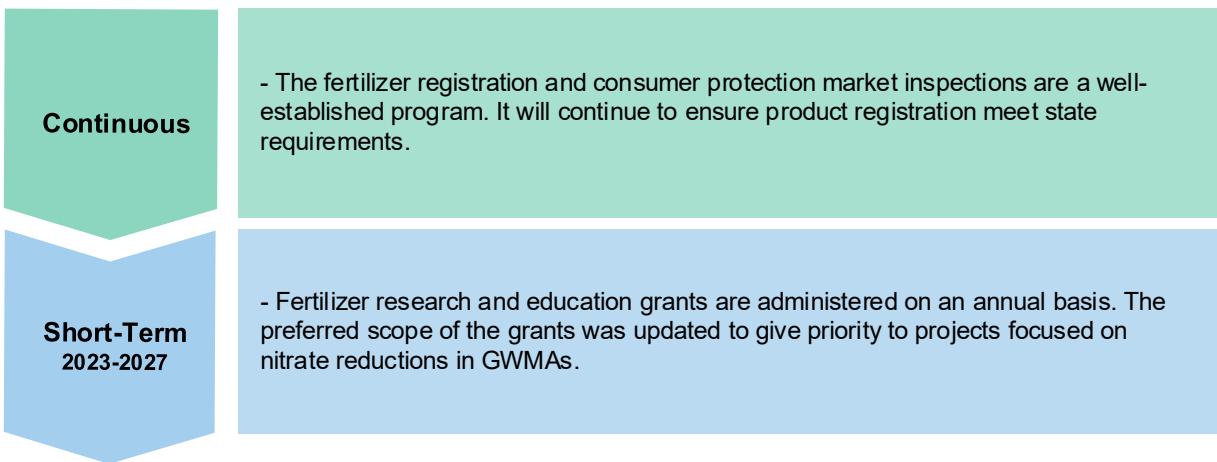
As shown in the graphic below, all fields with purple shading were part of the evaluation. The inventory of fields that were not observable from public roadways will continue into 2026, with both AGWQ staff and Morrow SWCD staff providing inputs as they become available.



4.2.3.4 Fertilizer Registration Program

4.2.3.4 Fertilizer Registration Program

OBJECTIVE: Provide consumer protection and ensure truth in labeling to ensure consumers are informed of the product contents and ensure all products that are sold in Oregon are registered according to requirements. *[4.2 Irrigated Agriculture]*



Monitoring Progress:

- Refer to Section 4.2.3.1. for non-point source performance tracking related to fertilizer use.

Progress Summary for 2025:

In 2025, the ODA Fertilizer Program continued to carry out its core regulatory responsibilities, including licensing, product registration oversight, and routine inspection authority for Fertilizer Manufacturer Bulk Distributors operating in Morrow and Umatilla counties.

While no new fertilizer research requests for proposals were solicited or funded during 2025, the program continued to support and oversee an ongoing research project titled “Best Management Practice Research of Existing Agriculture in the Groundwater Management Area in the Lower Umatilla Basin,” which was awarded in 2024. That project has a total cost of \$90,554, with \$26,753 funded by ODA, and is scheduled for completion by April 30, 2026. Current budget constraints may limit the program’s ability to solicit new research proposals; however, if sufficient funds become available, the program may consider issuing a request for proposals in 2026.

4.2.3.5 Irrigation Fertilizer Backflow Prevention

NOTE: This is a new activity OWRD initiated in 2025. While it is not yet represented in the Nitrate Reduction Plan, it will be included in future versions.

Backflow Prevention Program Summary

OWRD launched a comprehensive backflow education and inspection program to ensure that a functioning backflow device was installed on irrigation systems that use groundwater and inject chemicals or fertilizers into the irrigation system. OWRD conducted over 750 inspections at 660 sites throughout the LUBGWMA. At the beginning of the irrigation season, nearly none of the inspected irrigation systems were fully in compliance – by the end of September, over 99% of these sites were in compliance.

Oregon requires the installation and maintenance of back-siphon prevention devices on irrigation systems connected to groundwater sources when chemicals or fertilizers are applied (Oregon Administrative Rule 690-215-0017). Although this rule has been in effect since the 1990s, enforcement has been limited until recently. In 2025, OWRD initiated active enforcement of these requirements in the Lower Umatilla Basin Groundwater Management Area (LUBGWMA).

Between February 2025 and October 2025, OWRD conducted inspections at 660 sites within the LUBGWMA. These inspections revealed widespread non-compliance. However, after OWRD identified the issue, most property owners that use chemicals in their irrigation systems took timely action to install the required backflow prevention devices.

To address non-compliance, OWRD tagged and documented these wells indicating compliance status and what the required action should entail. In total, over 750 inspections were conducted as some sites required multiple visits to verify corrective actions and provide additional guidance. Out of the 660 wells visited, 175 were utilizing chemicals in the irrigation systems, therefore requiring a backflow device. There were 21 cases that required additional enforcement actions to gain compliance, resulting in 21 Notice of Violations, with six of these escalating to a Notice of Assessment.

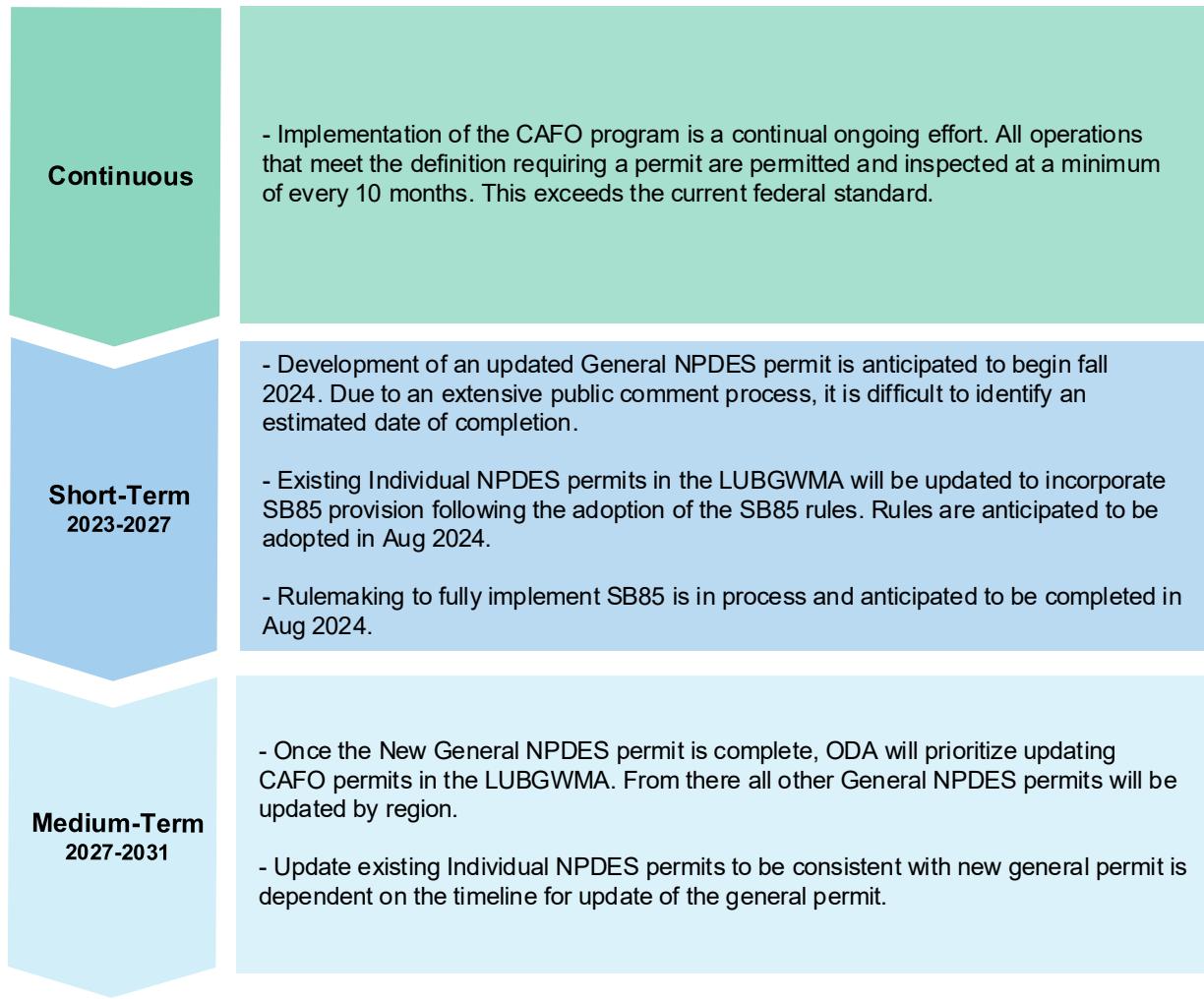
As a result of these actions, all 175 wells requiring backflow devices were brought into compliance by the end of the inspection period. To ensure sites with chemigation maintain the backflow devices and adhere to the requirements, OWRD will continue to monitor active sites in the LUBGWMA and surrounding areas.

4.3 Confined Animal Feeding Operations (CAFOs)

4.3.3.1 Confined Animal Feeding Operations Compliance

4.3.3.1 Confined Animal Feeding Operations Compliance

OBJECTIVE: Continue to administer regulatory oversight of CAFOs in Oregon that exceed the federal standards, including the implementation of SB 85 provisions to ensure compliance and protection of groundwater. *[4.3 Confined Animal Feeding Operations (CAFOs)]*



Monitoring Progress:

The CAFO program tracks and reports the percent of permitted CAFOs found to be in compliance with their permit during routine inspections for each calendar year. The CAFO program also monitors the age of each individual permit in the LUBGWMA and updates them as needed.

- Percentage of CAFOs in compliance with permit at annual inspection.
- Number of permits in LUBGWMA that have been updated.

Progress Summary for 2025:

In 2025, one CAFO in the LUBGWMA canceled its permit; a close-out inspection was conducted in 2024 documenting that the facility was never built and no animals were on-site. Of the 11 currently permitted CAFOs in the LUBGWMA, eight are on the Oregon CAFO National Pollutant Discharge Elimination System (NPDES) General Permit and three are on individual NPDES permits. Of the 10 that received a routine inspection in 2025, nine were found in compliance with their permit. ODA conducted two additional inspections to check progress of construction projects and both were found to meet permit requirements. The program also continued to provide planning assistance when requested. No complaints were received or followed-up on.

The Oregon CAFO NPDES General Permit #01-2016 expired and was administratively extended in 2021. In 2025, the CAFO NPDES General Permit was drafted. The draft factsheet and draft permit were shared with EPA on July 11, 2025, for review and feedback. Following review by program staff at ODA and DEQ, the public notice for the draft permit was issued on November 13, 2025, the public hearing was held December 16, 2025, and the deadline for public comments was January 21, 2026. Response to those comments and final permit issuance is forthcoming.

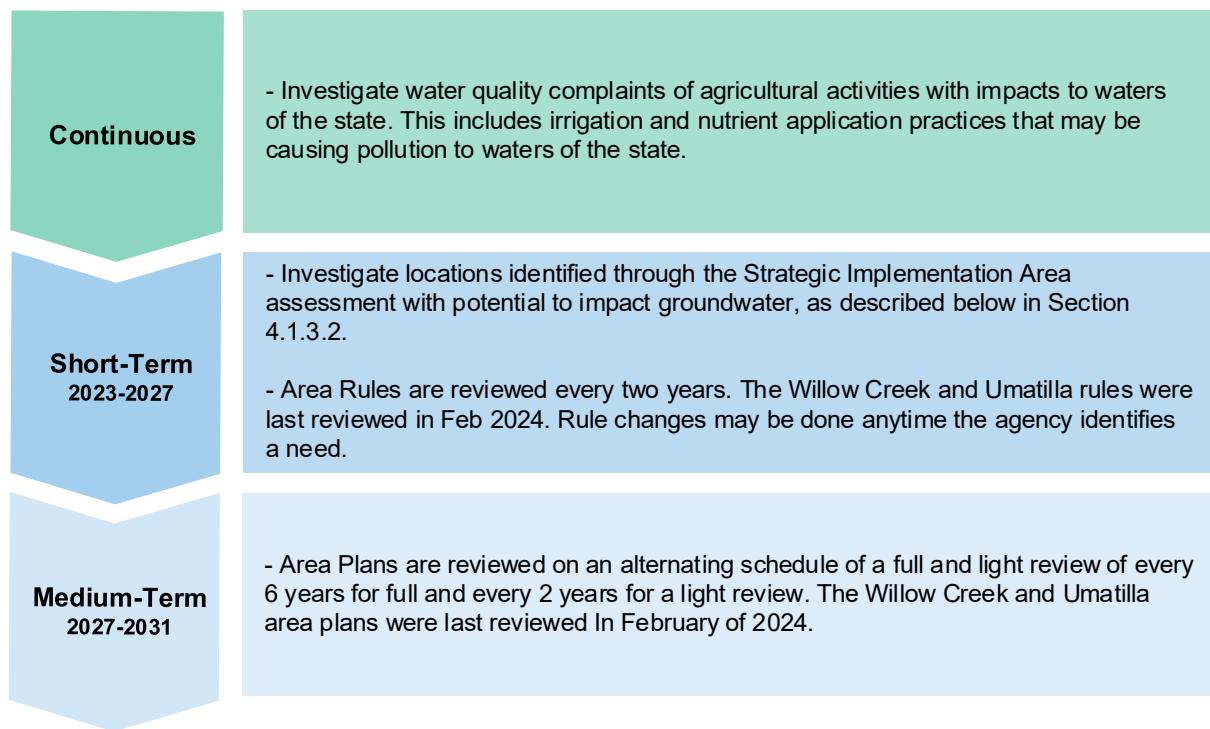
The Oregon CAFO Water Pollution Control Facilities (WPCF) General Permit #01-2015 expired and was administratively extended in 2025; it is scheduled to be drafted in 2026. As part of their permit renewal process in 2025, operators of CAFOs on the WPCF permit submitted a Water Supply Plan, as required by Senate Bill 85 (2023), for review by OWRD. Based on feedback from operators and program staff at ODA and OWRD, the Water Supply Plan form was revised for operators of CAFOs on the NPDES permit to submit when applying or renewing to the permit in 2026.

4.4 Livestock Grazing

4.4.3.1 Agricultural Water Quality Program (AGWQ)

4.4.3.1 Agriculture Water Quality Program (AGWQ)

OBJECTIVE: Prevent and control water pollution (including groundwater) from agricultural activities to achieve water quality standards. [4.4 Livestock Grazing]



Monitoring Progress:

- See monitoring information listed in Section 4.1.3.1

Progress Summary for 2025:

There were no water quality complaints received regarding livestock operations within the LUBGWMA in 2025. During the remote evaluation period for the SIA implementation, ODA identified 13 livestock operations with potential concerns to water quality. All 13 operations received letters identifying the concern and information on how to contact the Morrow SWCD for technical assistance in resolving the issue.

During 2025, ODA's Water Quality Team completed seven site visits to the identified livestock operations while the Morrow SWCD completed four site visits to evaluate and provide technical assistance to producers/property owners. Further outreach and technical assistance will occur in 2026.

4.4.3.2 Inventory of Livestock Operations

4.4.3.2 Inventory of Livestock Operations

OBJECTIVE: Inventory all livestock operations that do not meet the definition of a CAFO and are not required to seek a permit and to do outreach and technical assistance to livestock owners to ensure compliance with groundwater protection requirements. *[4.4 Livestock Grazing]*

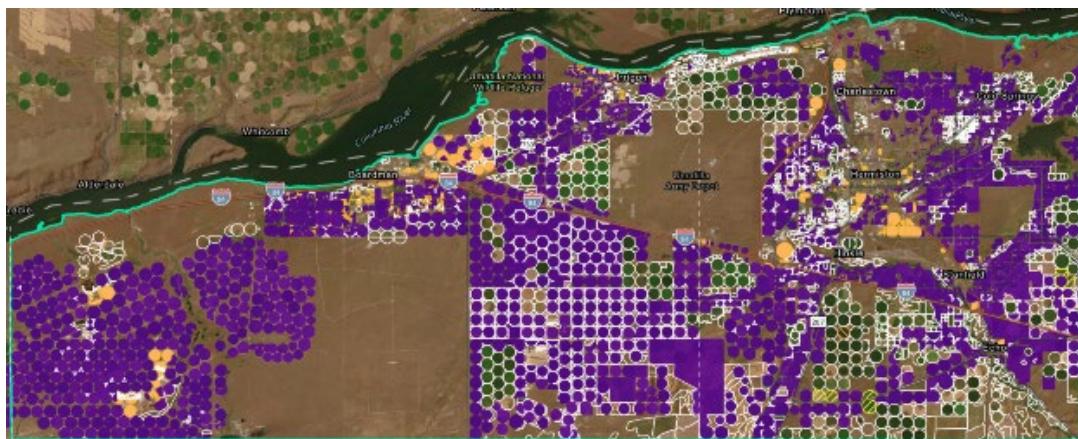
Continuous	- Outreach and technical assistance will start once the inventory is completed at the end of 2025 and will be ongoing.
Short-Term 2023-2027	- Conduct an inventory of livestock owners within the LUBGWMA, to be completed by the end of 2025. - Input inventory data into a usable GIS layer, anticipated to be completed in 2025.

Monitoring Progress:

- It is estimated the inventory project will be complete by August 2025. After completion, the data will be used for outreach and technical assistance.

Progress Summary for 2025:

The Morrow County SWCD conducted and completed a visual inventory of agricultural fields within the LUBGWMA. Data inventoried includes livestock presence or absence, type of livestock, number of livestock, livestock use (heavy/light/none), crop type, and irrigation type. This data, along with number and size of fields, location, and soils will help prioritize outreach and BMP efforts in the area. Several large-scale corporate farms provided data to the SWCD digitally to aid in the completion of this inventory work. In the graphic below, the purple color are fields that were inventoried. Lack of public access in some areas prevented some fields from being included in the inventory, but ODA and Morrow SWCD staff will continue with data collection in 2026, as opportunities become available.



4.4.3.3 SB 85 Rules: Manure Management

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OBJECTIVE: To extend permit coverage and compliance requirements to those receiving and land applying animal nutrient exported from permitted CAFOs and land applied within a Groundwater Management Area boundary to ensure groundwater protection. *[4.4 Livestock Grazing]*

Short-Term
2023-2027

- Establish a rules advisory committee (RAC) and complete the rulemaking process to develop rules governing the Nutrient Application Permit, anticipated to occur late 2024.
- Draft and implement a General Nutrient Application Permit. General Nutrient Application Permit will be developed post rulemaking process, this process is anticipated to take 6-8 months.
- Recruitment of the Permit Coordinator and CAFO Inspector positions is anticipated to begin late 2024.

Monitoring Progress:

It is anticipated that the performance tracking used for the nutrient application permits will be similar to that of CAFO permits in evaluating the number that are in compliance with the permit on an annual basis.

- Percentage of permits in compliance with permit during routine inspection.

Progress Summary for 2025:

Drafting of the Nutrient Application Permit has been delayed due to the National Pollutant Discharge Elimination System (NPDES) and Water Pollution Control Facilities (WPCF) general permit renewals taking priority. Additionally, limited staffing resources impacts the program's ability to handle multiple permit drafting process at one time. Work on Nutrient Application Permit is expected to begin once the NPDES and WPCF general permit renewals are completed

The CAFO Inspector position to be based in the LUBGWMA is currently on hold due to state budget concerns.

4.5 Land Application of Industrial and Domestic Wastewater

4.5.3.1 Wastewater Permitting and Compliance

4.5.3.1 Wastewater Permitting and Compliance

OBJECTIVE: Continue regulating land application of industrial and domestic wastewater to protect groundwater under state authority in the absence of applicable federal regulations. [4.5 Land Application of Industrial and Domestic Wastewater]

Continuous

- Continue implementing and enforcing requirements of Water Pollution Control Facilities (WPCF) permits and National Pollutant Discharge Elimination System (NPDES) permits to ensure the collection, treatment, storage, and land application of wastewater is done in a manner that protects groundwater. Review facilities' required annual and monthly reports for compliance with permit conditions. Permits require facilities to continuously adapt operations to maintain compliance and minimize nitrate leaching potential.

Short-Term 2023-2027

- Prioritize modifications and renewals of wastewater permits in the LUBGWMA to be more protective of groundwater. WPCF permits can be issued for a term not to exceed 10 years. NPDES can be issued for a term not to exceed five years. DEQ may process permit modifications to further update conditions of permits in between renewals. Permit schedules are as follows:

* Port of Morrow: Permit updated and renewal issued 12/1/2017; Permit modifications issued since renewal: 11/1/2022, 2/1/2024, and 6/3/2024.

Lamb Weston - Hermiston: Permit update and renewal is currently underway. Permit expired 1/31/2009 but permit requirements remain in effect under an administrative extension until DEQ takes renewal action. Administrative extensions are authorized by Oregon rule (OAR 340-045).

* JR Simplot: Permit updated and renewal issued 11/1/2022. The facility has submitted a modification request to remove acreage from the land application program, which is under DEQ review as of July 2024.

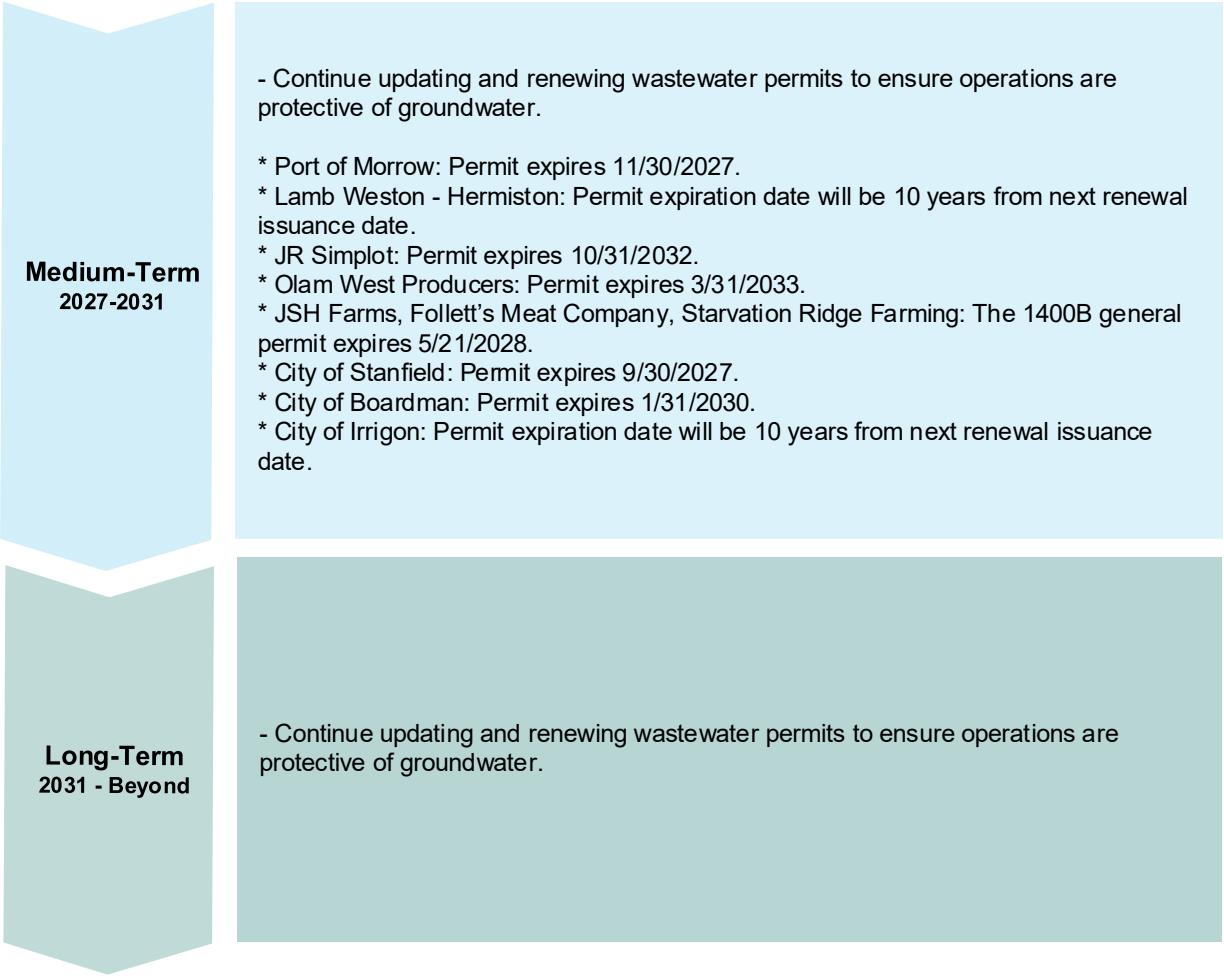
Olam West Producers: Permit updated and renewal issued 6/1/2023.

General permit holders: JSH Farms, Follett's Meat Company, Starvation Ridge Farming: These facilities are under the 1400B general permit that was updated and renewed 5/21/2018.

* City of Stanfield: Permit updated and renewal issued 10/13/2022.

* City of Boardman: Permit updated and renewal issued 2/13/2020.

* City of Irrigon: Permit expired 4/30/2009 and is under administrative extension. The facility completed an MAO with DEQ in 2021 that required wastewater treatment improvements to discharge below 7 mg/L nitrate. Permit renewal is pending.



Medium-Term
2027-2031

- Continue updating and renewing wastewater permits to ensure operations are protective of groundwater.
- * Port of Morrow: Permit expires 11/30/2027.
- * Lamb Weston - Hermiston: Permit expiration date will be 10 years from next renewal issuance date.
- * JR Simplot: Permit expires 10/31/2032.
- * Olam West Producers: Permit expires 3/31/2033.
- * JSH Farms, Follett's Meat Company, Starvation Ridge Farming: The 1400B general permit expires 5/21/2028.
- * City of Stanfield: Permit expires 9/30/2027.
- * City of Boardman: Permit expires 1/31/2030.
- * City of Irrigon: Permit expiration date will be 10 years from next renewal issuance date.

Long-Term
2031 - Beyond

- Continue updating and renewing wastewater permits to ensure operations are protective of groundwater.

Monitoring Progress:

- Number of permits that have been updated via renewal or modification.
- Ensure annual compliance reports are submitted to DEQ each year. Permits require that facilities monitor groundwater nitrate fluctuations and trends at their individual sites to monitor and remediate potential impacts.
- Number of facilities on track with completing compliance schedule and order milestones.
- Number of engineering reviews completed for wastewater infrastructure improvement projects.

Progress Summary for 2025:

Four facilities in the LUGBWMA are under DEQ orders or compliance schedules (see below). All facilities remain on track to meet requirements and milestones in their permits and orders, with specific updates as shown below:

- **Port of Morrow:**
The Port of Morrow completed its lined storage lagoons by November 1, 2025, as required by its DEQ wastewater permit and enforcement settlement compliance plan. It now has the capacity it needs to store wastewater during winter months and has ended winter irrigation. The port also continues working on design for a new secondary treatment system. The secondary treatment will provide more consistent wastewater quality for reuse (including nitrogen as fertilizer) in the growing season. This will allow the growers using the wastewater to better plan for how much nitrate to expect in the reuse water for crop uptake and beneficial reuse. DEQ reviewed the preliminary design and provided comments in November 2025 to inform the next deliverable for the system design.

- **Lamb Weston Hermiston:**
DEQ issued a renewed wastewater permit for the Lamb Weston Hermiston facility in November 2025 after an extended public comment period. The public comment period opened September 4 and was originally scheduled to close October 9. DEQ received a request to extend the public comment period and granted an extension until October 20, 2025.

The permit is consistent with other recent permit actions in the area to better protect groundwater. It requires the facility to restrict and phase out winter irrigation by constructing lined storage lagoons by November 1, 2027; requires increased monitoring and reporting, including higher density of soil moisture sensors, and yearly nitrogen balance assessments for each field in its application program. The permit also requires the facility to risk-rank land application sites for winter application and prohibits it from applying to high-risk fields or those with too much nitrogen in the soil to reduce the risk of leaching.

In March 2025, DEQ approved the facility's compliance plan required by a Mutual Agreement and Order that settled a penalty DEQ issued to the facility in September 2022. The MAO included interim measures to aid in protection of groundwater while the permit process progressed. This included nitrogen budgeting/accounting, and flow restrictions for how much wastewater is land applied in the winter months.

- **Olam West Coast, Inc.:**
DEQ updated and renewed Olam West Coast Inc.'s wastewater permit in June 2023. The permit requires the facility to design and construct an additional lagoon to manage flows in the winter months. The facility sporadically discharges in the winter due to insufficient storage, a practice that is required to end by November 2026. In February 2025, DEQ reviewed the engineering design documents for the facility's new lined storage pond and received final 100% design documents for review at end of June 2025. DEQ approved the final plans in July 2025, and the facility must complete construction to meet the November 2026 deadline.

- **J.R. Simplot Hermiston:**

DEQ issued a permit modification for the facility in June 2025 after completing a public notice period. The modification was to the November 2022 permit renewal and adds a small amount of acreage, adjusts monitoring requirements, and updates the facility's groundwater monitoring plan. DEQ is working to resolve an open enforcement case with the facility for reported agronomic rate exceedances and groundwater exceedances, along with its request to remove a farm area from the program. The facility previously ended winter irrigation of wastewater as a corrective measure due to groundwater impacts and added storage and reduced wastewater volumes managed.

4.6 Rural Residential

4.6.3.1 Agricultural Water Quality Program

4.6.3.1 Agriculture Water Quality Program	
OBJECTIVE: Prevent and control water pollution (including groundwater) from agricultural activities to achieve water quality standards. <i>[4.6 Rural Residential Strategies Schedule]</i>	
Continuous	- Investigate water quality complaints of agricultural activities with impacts to waters of the state. This includes irrigation and nutrient application practices that may be causing pollution to waters of the state.
Short-Term 2023-2027	- Investigate locations identified through the Strategic Implementation Area assessment with potential to impact groundwater, as described below in Section 4.1.3.2. - Area Rules are reviewed every two years. The Willow Creek and Umatilla rules were last reviewed in Feb 2024. Rule changes may be done anytime the agency identifies a need.
Medium-Term 2027-2031	- Area Plans are reviewed on an alternating schedule of a full and light review of every 6 years for full and every 2 years for a light review. The Willow Creek and Umatilla area plans were last reviewed in Feb 2024.

Monitoring Progress:

- See monitoring information listed in Section 4.1.3.1

Progress Summary for 2025:

No water quality complaints were filed or investigated this year by ODA in rural residential areas within the LUBGWMA. ODA sent seven letters to operations that had potential concerns for water quality resulting from management observed on properties in rural residential areas or within city limits (Boardman, OR). Within those letters, ODA provided information on how to contact the Morrow County SWCD for technical assistance on addressing the potential concerns. ODA will conduct follow-up in 2026.

4.6.3.2 Onsite Septic System Permitting and Compliance

4.6.3.2 Onsite Septic System Permitting and Compliance

OBJECTIVE: Continue regulating onsite septic systems to protect groundwater and public health. [4.6 *Rural Residential Strategies Schedule*]

Continuous

- Partner with Umatilla County Public Health Department to ensure implementation of rule requirements for the construction, alteration, repair, operation, and maintenance of residential onsite septic systems.
- Implement and enforce Water Pollution Control Facilities (WPCF) Onsite permits for large onsite septic systems, such as commercial or community systems, that receive over 2,500 gallons of wastewater per day or wastewater that is stronger than residential strength.

Monitoring Progress:

- Track residential onsite septic system applications submitted to Umatilla County Public Health Department for Morrow and Umatilla counties.
- Track number of WPCF Onsite permits issued or renewed in Morrow and Umatilla counties.
- Ensure annual WPCF discharge monitoring reports are submitted to DEQ each year when required by permit. All new and renewed WPCF permits require annual submission of discharge monitoring reports.

Progress Summary for 2025:

- Umatilla County Public Health continues to manage residential onsite septic system permits for Morrow and Umatilla counties.
- Umatilla County Public Health received 191 residential onsite septic system applications in Morrow County and 41 applications in Umatilla County in 2025, which includes site evaluations, permits, and authorization notices.
- DEQ issued or renewed two WPCF Onsite permits (Space Age Travel and PDX 202) and received 12 annual discharge monitoring reports in 2025 for the 2024 calendar year. Twelve discharge monitoring reports have not yet been submitted and DEQ is working with these facilities to obtain the required reports. Annual discharge monitoring reports for the 2025 calendar year are due by February 15, 2026; however, due to a database change to Your DEQ Online (YDO), permittees will have an additional 90-day grace period for submitting those reports in 2026. Note that some older WPCF permits that have not been recently renewed contain language in their permits that allow for discharge monitoring reports (DMRs) to be kept on site with submission to DEQ upon request.

4.6.3.3 Onsite Septic System Repair and Replacement Funding

4.6.3.3 Onsite Septic System Repair and Replacement Funding

OBJECTIVE: Continue providing homeowners with affordable financing options to repair or replace failing septic systems. *[4.6 Rural Residential Strategies Schedule]*

Continuous

- Partner with public agencies or qualified nonprofit lender(s) to offer affordable financing options for septic system repair and replacement when funding is available for this purpose.

Monitoring Progress:

- Assess if residents in the area received financing for repair or replacement of their septic systems through DEQ managed programs.

Progress Summary for 2025:

DEQ partners with the nonprofit lender Craft 3 to offer affordable financing for homeowners to repair or replace their failing septic system. Craft 3 provided three low-interest loans to residents in Morrow and Umatilla County in 2025. This program depends on new legislative funding allocations. There were no new allocations in the 2025 Oregon legislative session. Without new funding allocations, the future of this financing option is uncertain. Craft3 has provided additional funding from its own sources to support the septic program through March 2026 and has reported that it will pause the program in April if no additional funding is provided by the legislature.

4.6.3.4 Public Wastewater Treatment System and Irrigation Modernization Funding

4.6.3.4 Public Wastewater Treatment System and Irrigation Modernization Funding

OBJECTIVE: Continue providing public entities with low interest loans and additional subsidies to support public wastewater system upgrades or expansion and irrigation modernization. *[4.6 Rural Residential Strategies Schedule]*

Continuous

- Support public entities with funding and technical resources through DEQ's Clean Water State Revolving Fund program. Subsidies are dependent on funding availability.

Monitoring Progress:

- Assess how many communities in the area have applied for funding, are on the intended use plan, or have received financing from the Clean Water State Revolving Fund.
- For communities that have received financing, include the anticipated water quality benefits of the funded projects.

Progress Summary for 2025:

- **Active projects:** DEQ has three ongoing loan agreements: one with the City of Stanfield to develop a wastewater facility plan, and two with the City of Umatilla: the first for sewer extension and second for primary treatment upgrades.
- **Completed projects:** The City of Irrigon and the City of Echo have completed their CWSRF-funded projects, and the loans have entered repayment.
- **Pending projects:** DEQ has received five additional loan applications: one from the City of Hermiston for sewer extension, one from the Port of Morrow for secondary treatment upgrades, one from Westland Irrigation District for floating solar panels, one from Hermiston Irrigation District for canal piping and infrastructure modernization and one for the City of Stanfield for a mixing zone study.
- **Note:** The CWSRF loan program is funded by a combination of state revolved funds and new federal grants. DEQ is planning for a reduction in federal funding in the next couple of years due to the 2021 Infrastructure Investment and Jobs Act expiring. The fund is sustainably managed and will continue providing below-market rate loans using revolved funds as well as expected continuation of base federal capitalization grants.

4.6.3.5 Domestic Well Construction and Compliance

4.6.3.5 Domestic Well Construction and Compliance

OBJECTIVE: Protect groundwater resources through ensuring that new and modified wells are constructed properly, abandoned wells are providing education to the public and well drilling community, and utilizing enforcement actions when necessary. *[4.6 Rural Residential Strategies Schedule]*

Continuous

- Ensure wells are properly constructed, altered, maintained, and decommissioned so as to prevent contamination, loss of artesian pressure, and waste of Oregon's groundwater resources.

Monitoring Progress:

- Inspect 90% of new, altered, and abandoned wells in the LUBGWMA.
- Conduct in-depth well assessments at 10 wells per year (more if federal funds are secured).

Progress Summary for 2025:

The Well Compliance and Construction Program completed 96% of the inspections in 2025 for the 78 notices (“start cards”) OWRD received for drilling, altering, or abandoning a well. Of the 75 inspections or attempted inspections, all were domestic or exempt wells with staff identifying no deficiencies during inspections or review of the corresponding well logs.

5. Monitoring, Data, and Analysis

5.1.1 Groundwater Quality Sampling and Monitoring

5.1.1 Groundwater Quality Sampling and Monitoring

OBJECTIVE: Monitor groundwater quality to understand current nitrate concentrations and track changes over time. *[5.1 Technical Work]*

Continuous

- Quarterly sampling of DEQ's long-term well network of about 30 wells; occasional larger-scale sampling events as resources allow.

Monitoring Progress:

- Confirm quarterly sampling occurred and report results from previous year.
- Report results of any additional DEQ sampling events.

Progress Summary for 2025:

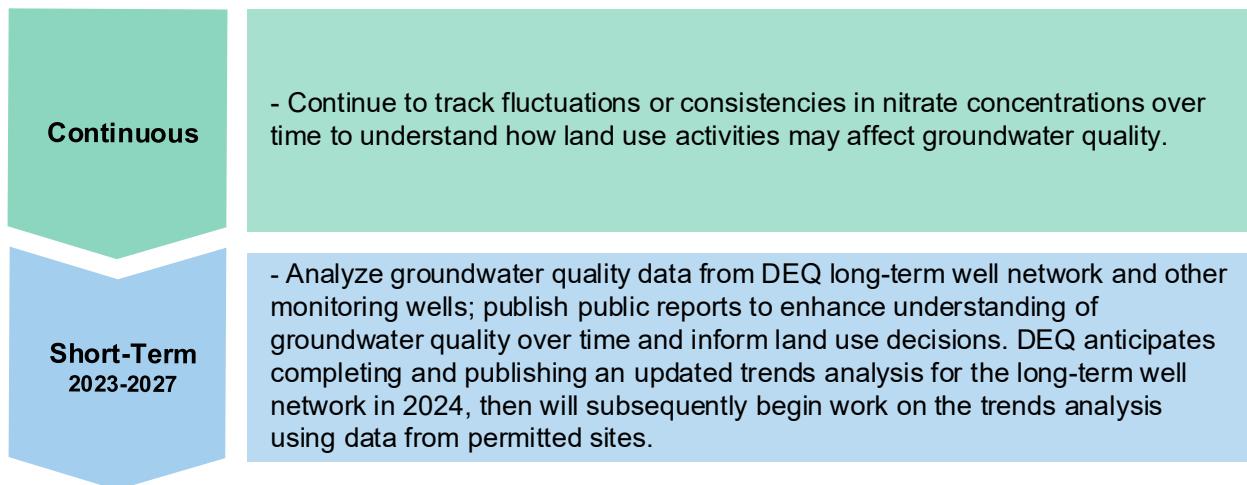
- DEQ completed four quarterly sampling events of the LUBGWMA long-term well network of about 30 wells in March, April-June, September, and November 2025. DEQ delivered annual results to well owners in English and Spanish during the November sampling. The 2025 long-term well network results showed 9 wells (~30%) consistently tested above the 10 mg/L drinking water standard, 4 wells (~13%) fluctuated around the limit, and 17 wells (~57%) were consistently below the limit. All results are publicly available online in [DEQ's Ambient Water Quality Monitoring System \(AWQMS\)](#).
- DEQ also conducted a larger-scale synoptic sampling event of 74 wells, including the long-term well network and additional irrigation wells, monitoring wells from permitted land application (agricultural) operations, and domestic wells. The 2025 synoptic sampling is the fifth synoptic sampling event DEQ has done in the LUBGWMA over the decades. Synoptic events have occurred in 1992, 2003, 2009, 2015, and 2025. In addition to nitrate, DEQ is also analyzing the synoptic samples for inorganic compounds, pesticides, pharmaceuticals, personal care products, and dissolved organic carbon. These additional water quality pollutants can be indicators of potential nitrate sources (e.g., pharmaceuticals and personal care products are likely from septic systems, certain pesticides are likely from agriculture, dissolved organic carbon can indicate failing septic systems and/or poor manure management practices). The 2025 synoptic sampling results showed 35 wells (~47%) tested above the 10 mg/L drinking water standard for nitrate, and 39 wells (~53%) were below the limit. Similar to the long-term well network results, synoptic sampling results are publicly available online in [DEQ's Ambient Water Quality Monitoring System \(AWQMS\)](#).

- DEQ also began collecting isotope samples in September 2024 for analysis at the U.S. EPA Corvallis lab. Isotope analysis can aid in identifying the sources of nitrate in the groundwater. The EPA Corvallis lab has experienced delays due to reductions in resources, however work on both nitrate and water isotopes are expected to resume in early 2026.

5.1.2 Groundwater Quality Trends Analysis

5.1.2 Groundwater Quality Trends Analysis

OBJECTIVE: To track fluctuations or consistencies in nitrate concentrations over time to understand how land use activities may affect groundwater quality. [5.1 Technical Work]



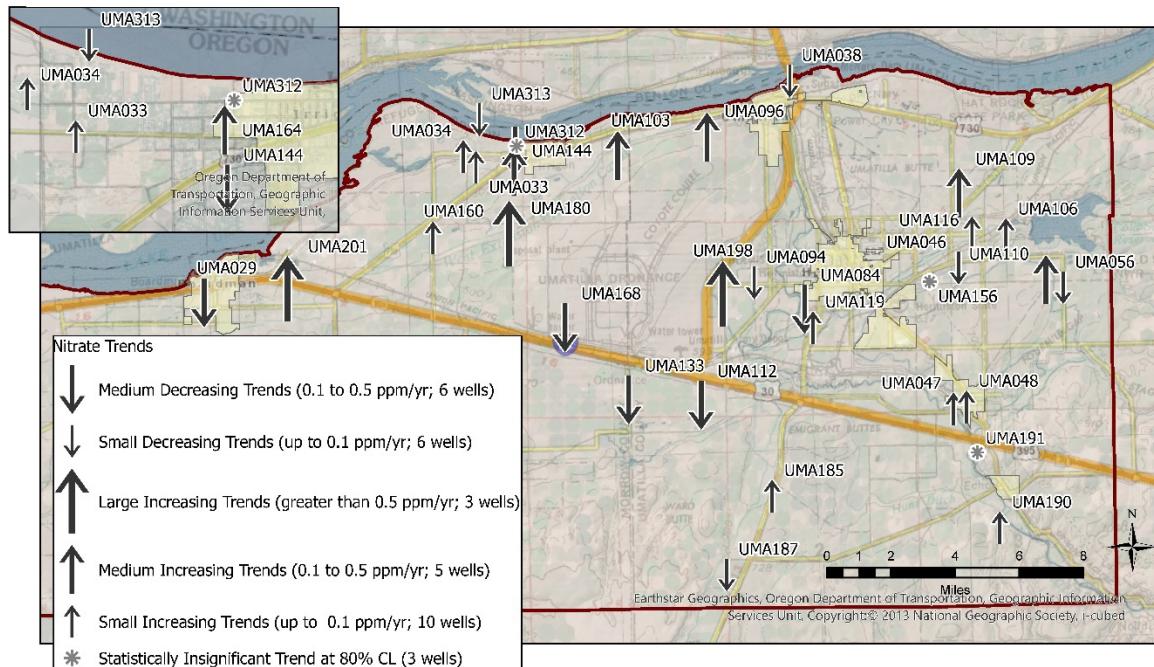
Monitoring Progress:

- Provide summary of any trends reports DEQ has published in the previous year.

Progress Summary for 2025:

- DEQ finalized and released an [updated trend analysis report](#) in January 2025 for DEQ's long-term well network. The report was reviewed internally as well as by OHA, ODA, OWRD, and an OSU statistician prior to being finalized.
 - The trend analysis reviewed concentrations across the 33-well network over a period of 32 years and found an overall increasing nitrate trend, with some decreases.
 - The continued increase of nitrate concentrations across the network indicates current nitrate leaching is likely.
- Next steps:
 - Evaluate trends using data from permitted facilities. These two sources of data—the long-term well network and permitted facilities—are separate datasets but are complementary in understanding short- and long-term nitrate trends in the area.
 - Analyze resource needs to expand the geographic extent of the well network to increase its usefulness in evaluating the entire LUBGWMA.

Figure 9
Nitrate Trends at Individual Wells
Groundwater Nitrate Trend Analysis - LUBGWMA Well Network



Notes:

(1) Symbols for UMA312 and UMA164 overlap. See inset map for more details.
 (2) Trends at 27 wells are from September 1991 through November 2023. Trends at four wells are shorter. See Table 1 for timeframes and trend slope.
 (3) Recent nitrate concentrations shown in Figure 5, average nitrate concentrations shown in Figure 6, and short-term changes in nitrate concentrations shown by LOESS lines in Appendix D are useful to place long-term trends into context.

Figure 9 from the 2025 report depicts up or down arrows indicating whether nitrate levels in that well are increasing or decreasing.

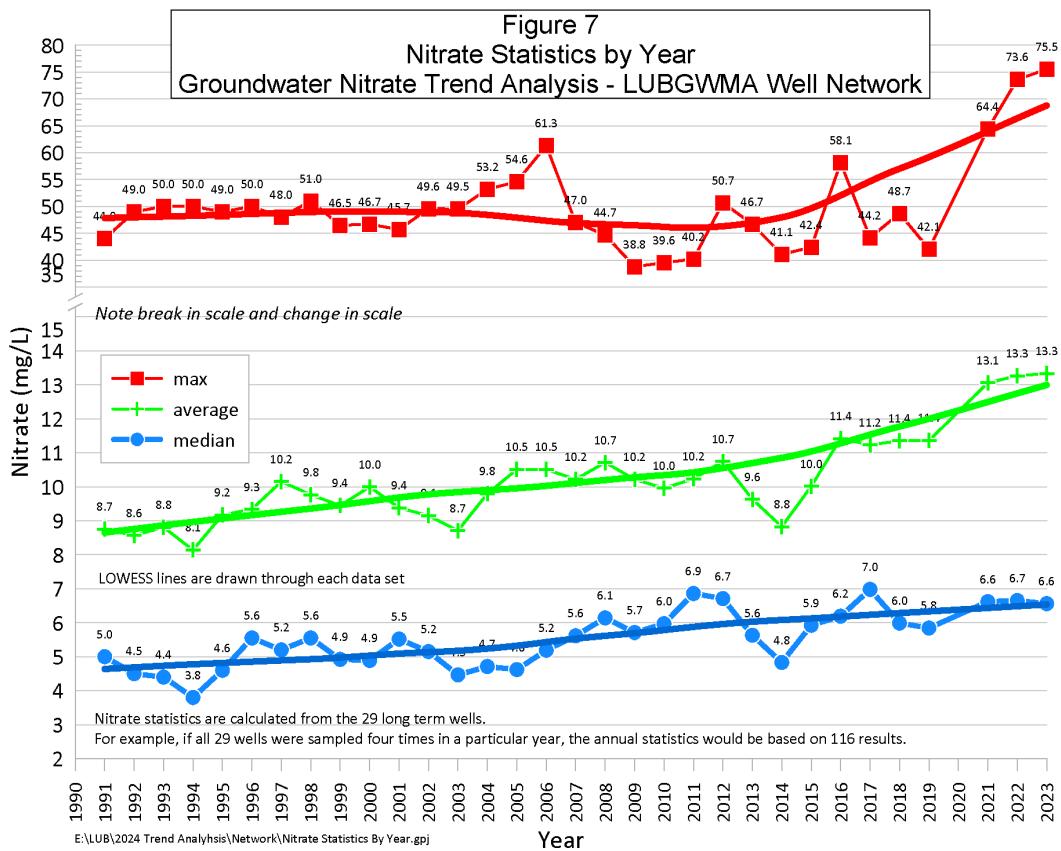
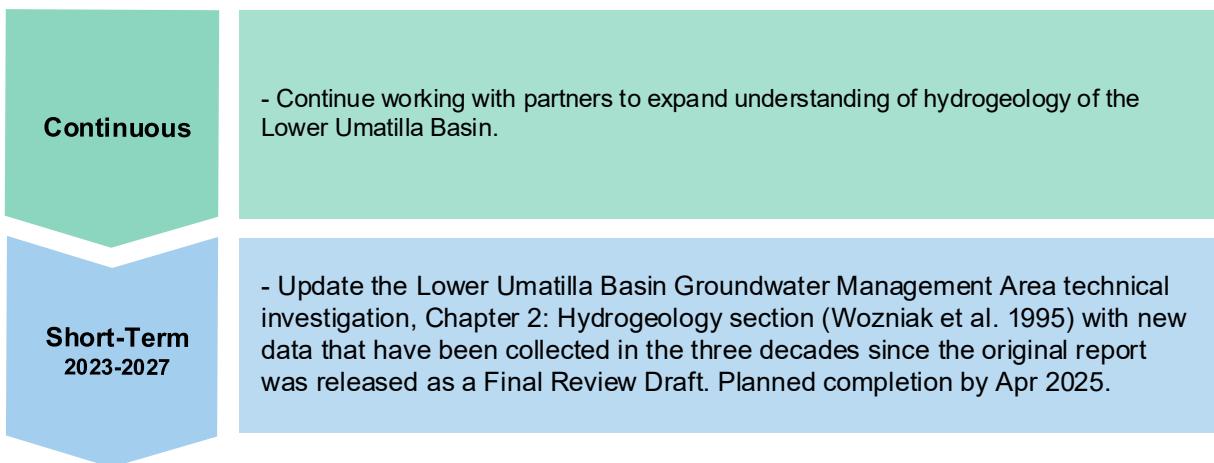


Figure 7 from the 2025 report shows three different ways of analyzing concentrations—maximum, average, and median nitrate concentrations—which all continue to increase.

5.1.3 Hydrogeology of the Lower Umatilla Basin - Update of Conceptual Model

5.1.3 Hydrogeology of the Lower Umatilla Basin - Update of the Conceptual Model

OBJECTIVE: The objective of this project is to update the Lower Umatilla Basin Groundwater Management Area technical investigation, Chapter 2: Hydrogeology section (Wozniak et al. 1995) with new data that have been collected in the three decades since the original report was released as a Final Review Draft. *[5.1 Technical Work]*



Monitoring Progress:

- Complete update of the 1995 report by April 30, 2025.
- USGS completes peer review of updated report by October 31, 2025. If USGS is unable to complete the peer review, seek other qualified reviewers from state agencies, academic institutions, and/or other professionals as appropriate.

Progress Summary for 2025:

OWRD's update to the conceptual hydrogeology model of the LUBGWMA met all deadlines for key milestones in 2025, and OWRD plans to publish the update as an Open File Report by mid- 2026. The draft version of the "Hydrogeology of the Lower Umatilla Basin Groundwater Management Area, Oregon: 2025 Update" was distributed for external peer review on July 15, 2025, with peer review ending on October 31, 2025. Peer review comments have been submitted and revisions to the report are in progress.

5.1.4 Ongoing Groundwater Levels Data Collection

5.1.4 Ongoing Groundwater Levels Data Collection

OBJECTIVE: Track groundwater levels over time to inform understanding of the aquifer system. *[5.1 Technical Work]*

Continuous

- Collect quarterly groundwater level data through OWRD's well monitoring network in the LUBGWMA.

Monitoring Progress:

- Continue to collect quarterly data from existing well network in the LUBGWMA.
- Conduct in-depth well assessments at 10 wells per year (more if federal funds are secured).
- Expand network to fill data gaps as funding is available.

Progress Summary for 2025:

OWRD completed the annual and quarterly synoptic well level samplings for all established wells in the LUBGWMA and uploaded the data to OWRD's online [Groundwater Information System \(GWIS\) database](#). OWRD plans to expand the network of wells to fill data gaps as funding allows.

Although OWRD conducted outreach to recruit possible sites for the well survey program, the owners that initially volunteered their wells were not suitable candidates for the project due to site location, well depth and/or infrastructure restrictions. The intent was to survey these wells to better understand the connection between well construction, lithology, and nitrate concentrations, and to further examine the data to identify correlations. This would have provided additional information about wells that are spatially very close to each other but have very different nitrate concentrations. OWRD planned to share the information with the landowners and identify any repairs that may be necessary to prevent additional nitrate movement into the aquifer system. The funding for this program expired June 30, 2025, with future funding pending in 2026.

5.1.5 Nitrate Leaching Estimation Update

5.1.5 Nitrate Leaching Estimation Update

OBJECTIVE: Determine what additional data and resources would be needed to complete an updated nitrate leaching analysis. *[5.1 Technical Work]*

Short-Term
2023-2027

- Develop a plan to identify what additional data and resources would be needed to update a nitrate leaching analysis.

Monitoring Progress:

- Provide status update about plan development.

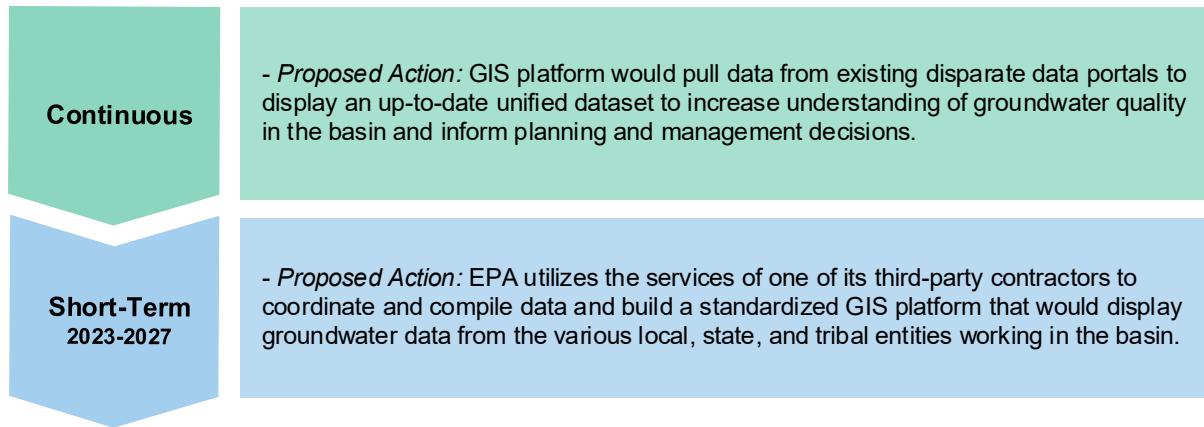
Progress Summary for 2025:

- In December 2025, Oregon agencies received a draft nitrogen loading estimate developed by a U.S. EPA contractor. Due to the lack of leaching rates, the report focuses on estimating total nitrogen loading to land in the area. This is not a nitrate leaching analysis, but instead an analysis estimating quantities of nitrogen from various sectors applied to the land per year. State agency staff are reviewing the data and allocation estimates for accuracy and will submit comments to EPA's contractor for consideration in February 2026. This nitrogen loading estimate may help inform next steps for an updated nitrate leaching analysis.
- DEQ, ODA, and OWRD have also convened a workgroup of technical staff to better coordinate technical work. The group is working to identify data gaps and resources needed for various program initiatives and updates, including an updated a nitrate leaching analysis.

5.2 Groundwater Data Coordination Effort and GIS Platform

5.2 Groundwater Data Coordination Effort and GIS Platform

OBJECTIVE: Coordinate and compile data from local, state, and tribal partners to build a publicly accessible GIS platform that displays groundwater data with the goal of having a common, high quality data set for the region to improve understanding of the hydrogeology and groundwater quality and inform management and planning decisions.



Monitoring Progress:

- Provide update about status of GIS platform development.

Progress Summary for 2025:

The U.S. EPA worked with state agency data to develop a draft LUB Data Hub—a GIS platform that compiles and displays land use and groundwater data from DEQ, OWRD, ODA, and CTUIR. State agencies are working with Oregon State University's Oregon Explorer program to refine and publish a beta version of the platform in 2026. The goal is to have a publicly accessible tool to increase understanding of groundwater quality in the basin and inform planning and management decisions. The extent of the tool's refinement and long-term maintenance is funding dependent, and the agencies are coordinating on resourcing efforts.

Oregon Explorer is a collaborative program of the Institute for Natural Resources and the Oregon State University Libraries and Press. Oregon Explorer is a natural resources digital library that provides access to integrated natural resources and community information. Through Oregon Explorer, users can interact with place-based, up-to-date scientific information through maps, data, images, publications, and user-driven tools. Information is archived, neutral, and maintained over the long-term with funds provided by each sponsor.

6. Safe Drinking Water For Well-Dependent Households

6.1 Immediate Safe Drinking Water Services

6.1.3.1 Community Education, Outreach and Engagement About Nitrate in Domestic Well Water

6.1.3.1 Community Education, Outreach and Engagement About Nitrate in Domestic Well Water

OBJECTIVE: Ensure all residents who depend on a domestic well for drinking water understand there are potential health risks from elevated nitrates in their well water, that safe water services are available to them, and how and whom to contact to access needed services and support. *[6.1 Immediate Safe Drinking Water Services]*

Continuous

- Maintain and as needed, develop new outreach and education materials and pathways, including updates to the OHA website, fact sheets and outreach materials. Partner with LPHAs and CBOs to carry out community engagement and education.

Short-Term
2023-2027

- Executed grant awards running through June 30, 2025, to renew funding of three CBOs (Doulas Latinas, Eastern Oregon Center for Independent Living, and National Center for Alternatives to Pesticides).
- By September 30, 2024, finalize a scope of work for a client services agreement with the CBO Euvalcree and by October 30 execute the contract backdated to July 1, 2024.
- Completed July 1, 2024 annual funding agreements with Morrow and Umatilla County Public Health Departments through June 30, 2025.
- Posted by July 31, 2024 maps presenting household well test results in a format that protects privacy of individual households to testmywell.oregon.gov and pruebadepozo.oregon.gov.
- Added by July 31 an interested party email sign up to OHA LUBGWMA websites, and an archive of OHA press releases related to the domestic wells public health project.
- By September 15, 2024, finalize a scope of work with strategic communication consultants the Metropolitan Group to review and provide recommendations for improvements to OHA website and CBO engagement.
- By September 30, 2024, begin publishing a monthly bulletin for dissemination via email and on the website.

Monitoring Progress:

- OHA to receive quarterly work reports from funded community-based organizations.
- OHA to receive and provide update on outreach needs and activities at biweekly partner meetings.

Progress Summary for 2025:

Launch of LUBGWMA Domestic Wells Quarterly Newsletter: In March 2025, OHA launched a newsletter, titled “My Well, My Health” and available in English and Spanish, to provide community members and interested parties with updates on completed safe water actions and milestones, links to resources and information on OHA’s LUBGWMA website, and a “tip of the quarter.” OHA also created a QR code in each language for new people to sign up to receive the newsletter, with a plan to disseminate the QR codes to CBOs to use during their tabling events. At launch, this newsletter had 386 subscribers and by December 31st, 2025, that number rose to 395.

The OHA team continues to refine the resources and information available on the LUBGWMA website. In 2025 these improvements included:

- Translating the “LUBGWMA Frequently Asked Questions” webpage, previously available only in English, to Spanish.
- Creating a new “Resources for Community” page (in English and Spanish) including a new Water Delivery FAQ created in collaboration with partners.
- Gaining access to webpage analytics, which will provide data on the effectiveness of our public-facing pages and how community members are accessing the available information.
- Making community partner logos and contact information more visible on the OHA website (moved from Frequently Asked Questions page).
- Initial development of a “data dashboard” for the LUBGWMA which will eventually replace the data tables and maps currently available in the “Data and News” section. This update will provide more accessible data visualizations that will update in real time to illustrate progress in LUBGWMA. OHA is seeking to launch this dashboard in early 2026.
- Continuing to develop an OHA-specific “Story map”, describing the agency’s historical role in LUBGWMA in collaboration with partners with a plan to have it online in early 2026.

Updated Materials: The OHA team also updated public health LUBGWMA outreach materials, including social media banners, flyers, and brochures, including shareable graphics for our partners to spread the word about the LUBGWMA newsletter and our updated websites.

Open House Events: OHA and partners sponsored community “Open House” events in Boardman and Hermiston on July 30 and July 31, 2025, similar to events hosted and well attended in 2023. These events provided community-requested presentations on human and animal health and nitrates, opportunities for residents to have one-one-one conversations with OHA toxicologists and Domestic Well Safety Program staff, OHA’s CBO partners, county public health staff, state natural resource agency staff, and OHA plumbing contractors.

Updated nitrate results letters and lab result cover sheets: After each processed well water test, OHA sends a letter in both English and Spanish to tested households

explaining their laboratory results. The letter also includes the health risks associated with high levels of nitrate contamination and potential qualifying resources available to the well user which is determined by the test result. In 2025, OHA made significant changes to these letters based on feedback from both community partners and well users regarding length, formatting, and content. As an additional improvement, these letters also provide all historical test results for the household. OHA also worked with the contracted laboratory responsible for processing well tests to develop and implement a “cover sheet” to include with all results that are mailed to households which help clarify results immediately before the official OHA letters are mailed. OHA’s contract lab began sending results with the new cover sheets in July 2025, and OHA began issuing the improved results letters December 2025.

Treatment system installation survey: OHA and partners developed a survey for households that have had water treatment systems installed, which will be mailed out in early 2026. This survey is designed to learn more about the experience of community members before, during, and after installation; identify gaps and barriers; and provide a space to share feedback. This survey, which is available in both English and Spanish, can be completed online or mailed using a paper version.

6.1.3.2 Free Initial Domestic Well Water Testing

6.1.3.2 Free Initial Domestic Well Water Testing

OBJECTIVE: By Jun 30, 2025, complete testing of 30%, or 420 of the 1,400 domestic wells that remain untested as of Jul 1, 2024. [6.1 *Immediate Safe Drinking Water Services*]

Short-Term
2023-2027

- By Jun 30, 2024, completed a minimum of two mailings of at-home nitrate test strips to unreached households (no trespassing/guard dogs/not home households).
- By Nov 30, 2024, complete canvassing of unreached households that do not receive mail at their physical address.
- By Dec 31, 2024, complete a mailing to households whose residents refused testing in summer 2023 renewing the free testing offer and including an “opt out” return mailer to request no further communication.

Monitoring Progress:

- OHA will regularly (generally a weekly or biweekly basis) log new initial water quality test results from its contract laboratory to OR-Wells database.
- OHA will update tabular data for well water nitrate testing and mapped data for highest nitrate results monthly on the English and Spanish versions of its website (testmywell.oregon.gov and pruebadepozo.oregon.gov; click on “Data and News”/“Datos y Noticias”)

Progress Summary for 2025:

Initial tests: In 2025, OHA, in collaboration with Morrow and Umatilla County Health Departments, and with support from local CBOs and ODHS completed initial nitrate testing of 138 households in LUBGWMA that receive their water from domestic wells. This brings the total number of households with completed initial well tests to 2,095 as of December 31, 2025.

Milestone achieved: Under the Interagency Oregon Nitrate Reduction Plan, OHA had the objective noted above to “By June 30, 2025, complete testing of 30%, or 420 of the 1,400 domestic wells that remain untested as of July 1, 2024.” By the end of June 2024, OHA had completed 1,706 tests out of an estimated 3,300 well dependent LUBGWMA households. Approximately 500 households declined testing, leaving about 1,094 households untested due to no trespassing signs or other access barriers. Between July 2024 and June 2025, OHA completed an additional 332 tests, reaching just over 30% of the households that had been inaccessible the previous year.

All testing is voluntary, and the remaining untested households have been the focus of multiple attempts and pathways to extend the offer of free well water testing and other safe water services.

Well water sample collection process and partnership change: In July 2025, OHA's partner LPHAs—Morrow County Health and Umatilla County Health—assumed responsibility for nitrate initial testing and retesting activities, including resident outreach, scheduling, and well water sample collection, a role previously coordinated by ODHS. The counties are collaborating to ensure consistent and comprehensive service across the region.

In addition to water sampling, the Umatilla County Public Health Department offers 'well health visits' during sample collection efforts in both counties. During these visits, an Environmental Health Specialist inspects the structural integrity of wells and provides recommendations to help prevent contamination beyond nitrate exposure. The specialist documents visible wellhead conditions and any notable issues—such as broken caps or leaking pipes—on a standardized form and collects a water sample for delivery to OHA's contract environmental laboratory.

LPHA staff from Umatilla or Morrow County share test results directly with well owners by phone and provide recommendations if any issues were identified during the visit. Residents also receive a laboratory report by mail, along with a follow-up letter from OHA summarizing their results and associated health risk information.

6.1.3.3 Free Domestic Well Water Retesting

6.1.3.3 Free Domestic Well Water Retesting

OBJECTIVE: Ensure households with initial nitrate test results below 10 mg/L are monitored and provided alternate water sources if nitrate in their domestic well water rises above the action level due to seasonal fluctuations and still-increasing nitrate concentrations in groundwater in the LUBGWMA. *[6.1 Immediate Safe Drinking Water Services]*

Continuous

- For these households at high risk of exceeding 10 mg/L range, implement a program of OHA direct mailings, followed by ODHS repeat phone calls to schedule and carry out water sample collection and deliver samples to the OHA contract laboratory for testing.
- For households with initial tests below 5 mg/L or above 25 mg/L, offer access to self-sampling by picking up and dropping off test kits at county public health department for ODHS to deliver to OHA contract laboratory, except that ODHS will provide sample collection assistance upon request.

Short-Term 2023-2027

- By June 30, 2024, completed a mailing to all households describing retesting protocols and pathways for retesting depending on their nitrate level.
- By June 30, 2024, mailed a second, individualized letter to households that completed their initial tests prior to June 2024. This letter provided the specific household's test results, corresponding testing schedule, and details about the sample collection scheduling.
- By June 30, 2024, incorporated retesting information into post-initial-test-results letter OHA mails to newly tested households.
- By December 31, 2024 develop a new reporting template to post to the OHA LUBGWMA websites with information about retesting progress.
- By June 30, 2025, complete quarterly well water re-testing of 75% of households identified as being at highest risk of exceeding 10 mg/L nitrate (i.e., households between 5mg/L - 9.99mg/L) and maintain this completion rate as new households are identified in this range.

Monitoring Progress:

- OHA will regularly (generally a weekly or biweekly basis) log new water quality retesting results from its contract laboratory to OR-Wells database.
- OHA will post tabular data for well water nitrate retesting on a monthly basis on the English and Spanish versions of its website (testmywell.oregon.gov and pruebadepozo.oregon.gov; click on “Data and News”/“Datos y Noticias”). (Note: this monitoring action to be implemented once OHA adds a retesting report to the webpage.)

Progress Summary for 2025:

OHA completed a total of 431 re-tests in 2025.

New retesting strategies established: For LUBGWMA households with initial nitrate results between 5 mg/L and 9.99 mg/L (“Tier 2” households at highest risk of exceeding the health action level), OHA committed to collecting and analyzing quarterly nitrate only samples until each household completed one full year of seasonal testing. After completing this four-quarter series, households with results remaining below 10 mg/L would transition to annual nitrate testing.

During Q3 2025, OHA notified households that had completed all four quarters that it would continue to fund quarterly nitrate only testing if households collected their own samples and submitted them either to a local drop-off site or directly to the laboratory. For households that have not yet completed the four quarter retesting series, LPHAs—working in coordination with OHA—will continue to contact them each quarter to schedule and collect samples.

In addition, OHA reevaluated the best time to retest household nitrate levels based on OHA’s analysis of test results collected by the program that indicates a seasonal fluctuation of nitrate levels in well samples. Based on the limited nitrate data OHA has collected within the LUBGWMA since March 2023, there appears to be a statistically significant intra-year difference in nitrate concentrations depending on the quarter in which samples were collected (Independent Samples Kruskal–Wallis Test; $p \leq 0.002$; $N = 1,018$ for 2024). Both the second and third quartiles of nitrate concentrations trend higher in the second and especially the third quarter of the year.

Because the goal of the OHA Domestic Well Safety Program is to characterize public health risk from nitrate exposure in domestic wells, first-time samples and seasonal resamples are best collected during the period most likely to reflect a “worst-case scenario.” Based on the data collected to date, this evidence informed the decision to shift to a Q3 sampling strategy.

OHA will prioritize sampling and annually retesting wells in summer months to increase the likelihood of a household’s highest nitrate result and therefore offer health interventions that in turn increase the likelihood of safe water consumption. OHA will continue to offer initial tests year-round but will inform households about this fluctuation.

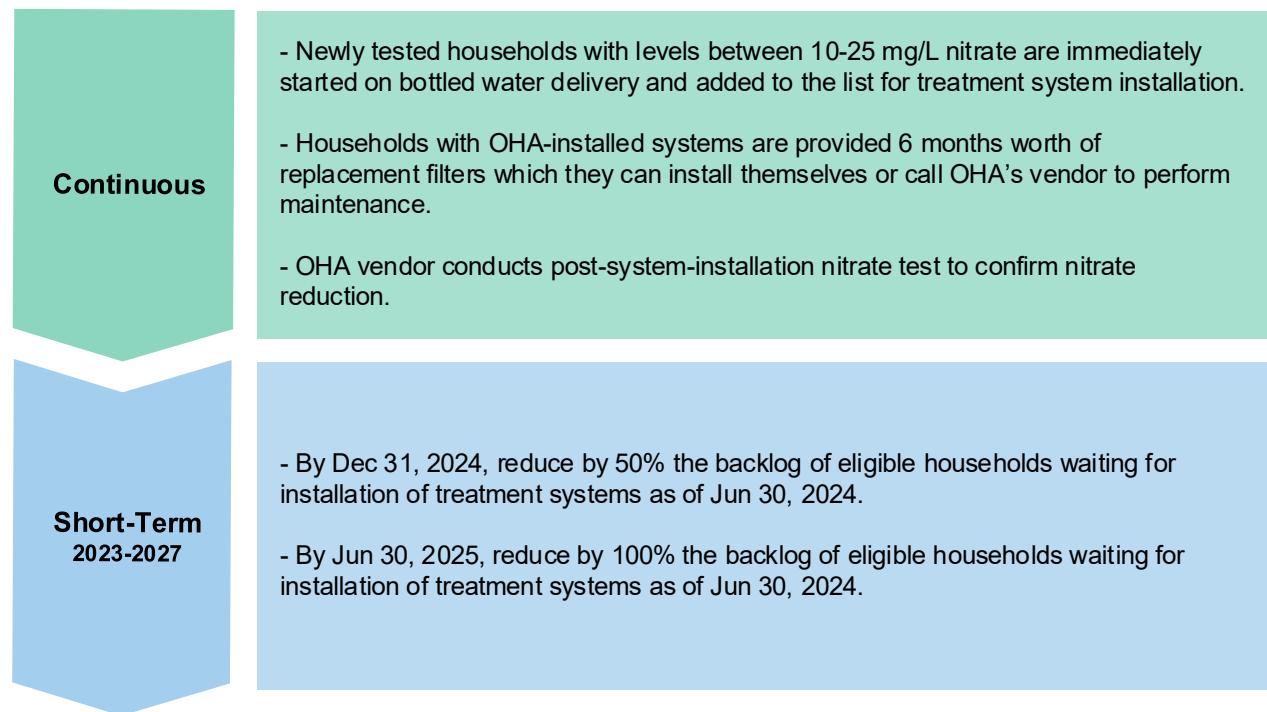
Milestone achieved: OHA completed its biennial milestone of conducting quarterly well water retesting for 75% of households identified as being at highest risk of reaching or exceeding 10 mg/L nitrate. Based on OHA data, as of June 30, 2025, 396 households were in this high-risk category (5-9.99 mg/L nitrate) – and 100% of these households

were retested or were offered retesting. This number rose to 429 households by December 31, 2025, and these households continue to be offered quarterly retesting as required.

6.1.3.4 Free Kitchen-Tap Treatment System Installation and Maintenance

6.1.3.4 Free Kitchen-Tap Treatment System Installation and Maintenance

OBJECTIVE: Provide safe drinking water to households whose domestic well water test results are 10 mg/L to 25 mg/L nitrate. [6.1 *Immediate Safe Drinking Water Services*]



Monitoring Progress:

- OHA will regularly (generally a weekly or biweekly basis) update its tracking Smartsheet of new installations and post tabular data on a monthly basis on the English and Spanish versions of its website (testmywell.oregon.gov and pruebadepozo.oregon.gov; click on “Data and News”/”Datos y Noticias”).

Progress Summary for 2025:

In 2025 OHA completed an additional 90 treatment system installations for eligible households (those testing between 10-24.99 mg/L), bringing the cumulative total to 289 installations by the end of December 2025. As of December 31, 2025, there were 415 households eligible for RO filter installation. OHA continues to experience a serious plumbing workforce constraint that limits the pace of installations. In addition, as OHA contacts eligible households when the agency's plumbing vendors have capacity, approximately 8.4% of households decline installation.

Plumber service contracts: OHA currently has two plumbing vendors under contract. Based on lessons learned, OHA identified opportunities to strengthen the effectiveness of the treatment system installation component of the program through a renewed

procurement for plumbing services. In November 2025, the OHA Domestic Well Safety Program, in collaboration with the Office of Contract and Procurement, opened a Request for Proposals (RFP) for licensed plumbers or individuals holding a water treatment certification. The RFP remained open for 42 days to qualified applicants. OHA sought to increase contractor capacity to support this component of the project with increased effectiveness by including in the RFP scope of work a requirement for contractors to establish an online booking system showing appointments available to the public on at least 10 days per month and maintaining a monthly average of 6–10 installations during the contract period. OHA received three proposals, which will be evaluated in January 2026, with the potential to issue new contracts thereafter. Our agreements with the current contractors will terminate prior to the issuance of new agreements.

New tools for plumbing contractors established: OHA-contracted plumbers have transitioned from using Smartsheet, a web-based tool, to a dedicated plumber web form that leverages real-time data from OR Wells. The new form allows plumbers to securely log in, access household-specific information needed to schedule installations or replace filters and update task status directly from their phone at the time of service. This process improves efficiency by reducing administrative burden and enhancing data accuracy.

Milestone achieved: OHA completed the June 30, 2025, milestone of reducing the backlog of treatment installations by 100%. As of June 30, 2024, there were 256 households eligible for RO water treatment systems to be installed, of those 256:

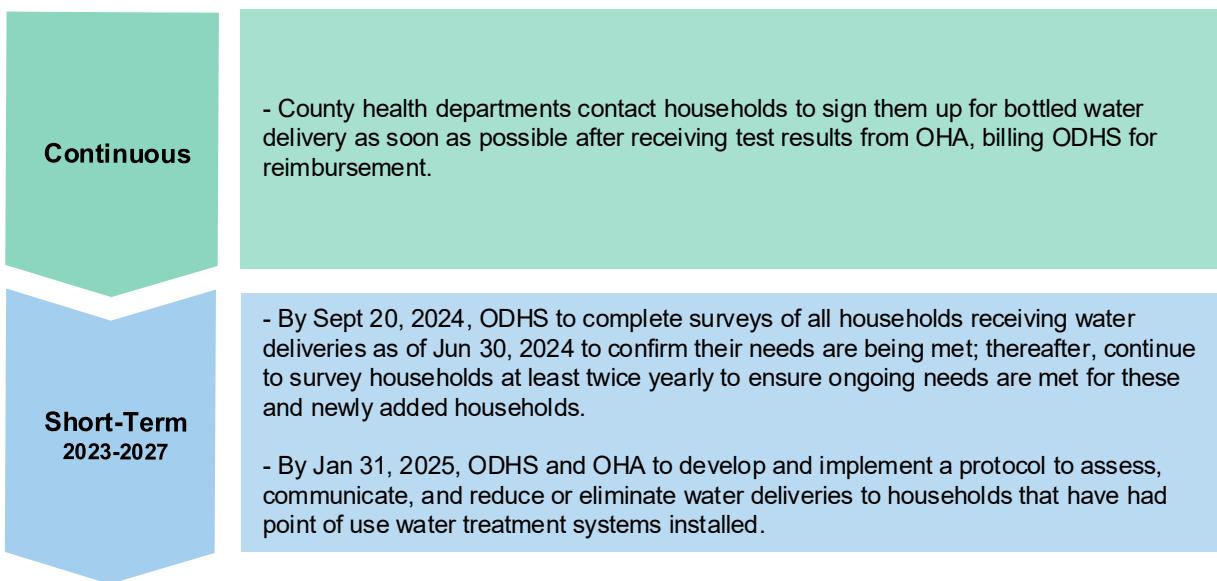
- 113 households from this group (44%) have had treatment systems installed.
- 95 (37%) households from this group have been contacted one or more times by OHA's plumbing contractors to schedule a treatment system install and have been unresponsive. The contractors are required to provide services in Spanish where needed.
- 41 (16%) households from this group declined the offer of a RO system installation when contacted by OHA's plumbing contractors.
- 7 households (13%) from this group expressed interest and were scheduled for installation.

Based on the figures above, all 256 households eligible for treatment systems as of June 30, 2024, either had systems installed, were scheduled for installation, declined the offer, or were non-responsive. OHA staff followed up with every household that declined or did not respond to plumbing contractors to offer installation again.

6.1.3.5 Free Water Delivery

6.1.3.5 Free Water Delivery

OBJECTIVE: Provide safe drinking water to households with domestic well water test results at or above 10 mg/L nitrate. *[6.1 Immediate Safe Drinking Water Services]*



Monitoring Progress:

- ODHS will regularly log information about residents receiving water deliveries in its case management database, DLAN and Morrow and Umatilla Counties will maintain their spreadsheet tracking of residents signed up for water deliveries.
- OHA will post tabular data on residents receiving potable water deliveries on a monthly basis on the English and Spanish versions of its website (testmywell.oregon.gov and pruebadepozo.oregon.gov; click on “Data and News”/“Datos y Noticias”).

Progress Summary for 2025:

Water delivery summary: As of December 31, 2025, ODHS records indicate 615 households receiving water deliveries, and 55 households that requested termination of water deliveries due to treatment system installation or not wishing to continue to receive bottled water from the state.

6.1.3.6 Longer Term Water Provisioning for Households Above 25 mg/L

6.1.3.6 Longer Term Water Provisioning for Households Above 25 mg/L

OBJECTIVE: Provide an alternative to bottled water delivery to households with domestic well water test results above 25 mg/L nitrate. *[6.1 Immediate Safe Drinking Water Services]*

Short-Term
2023-2027

- By December 31, 2024, ODHS to issue a Request for Information to solicit public or private sector solutions for providing drinking water to households with well water over 25 mg/L nitrate where reverse osmosis filters are not certified to remove nitrate to safe drinking water levels.

Monitoring Progress:

- ODHS to report on progress issuing and results at biweekly LUBGWMA partner meetings.

Progress Summary for 2025:

Exploration of water provisioning options underway: In early October 2025, representatives from the ODHS Office of Resilience and Emergency Management (OREM), along with local public health authorities from Morrow and Umatilla counties and technical experts, met to discuss potential long-term, home water filtration systems for LUBGWMA households with very high (above 25 mg/L) nitrate in well water. The purpose of the meeting was to explore sustainable drinking water solutions for these households that are consistent with long-term groundwater quality improvement in the LUBGWMA. In December a meeting was planned with a potential vendor to present options for a pilot project to the Morrow-Umatilla Drinking Water Roadmap Steering Committee. This presentation was rescheduled for January 2026.

6.1.3.7 Data and Data Management

6.1.3.7 Data and Data Management

OBJECTIVE: Maintain and as needed build out OHA and ODHS databases as the systems of record for all household data related to safe water services to support delivery of services and transparent communications about households served and awaiting service. *[6.1 Immediate Safe Drinking Water Services]*

Continuous

- Data systems are maintained on an ongoing basis.

Monitoring Progress:

- OHA will run routine database queries on a monthly basis and special queries to address non-routine information needs, and post updates to the OHA LUBGWMA websites and respond to public record requests.

Progress Summary for 2025:

Database queries and monthly reporting: OHA continues to provide monthly data reports to the LPHAs, including to the Morrow County Planning Department and its subcontractors working on the county-led Drinking Water Roadmap Project evaluating public drinking water system infrastructure feasibility.

In addition, OHA staff update the [LUBGWMA Data and Reporting website](#) on a monthly basis with new statistics related to testing and treatment, updated by the 5th of the following month. The date the website is updated has been changed from the 5th to the 15th of the month to ensure all testing results for tests conducted within the month have been provided to OHA from the testing laboratories and included. This change also aligns OHA's data reporting with the retesting schedule of households that tested initially within the 5.0mg/L to 9.99mg/L range for nitrate. These households are tested quarterly, and their results will be reported at the end of each quarter.

Increased data access for LPHAs: OHA granted Read/Write access to LPHA partners, allowing them to log household interactions (e.g., declined, scheduled, no response) for residents requiring quarterly retesting. This approach supports the DWSP's capacity while promoting local data ownership and reflects expanding LPHA responsibilities in this effort. OHA will generate and post quarterly reports on this county-submitted data to the OHA LUBGWMA Data and Reporting webpage to provide greater transparency and accountability about efforts to deliver water retesting.

New plumber web form: As noted above, OHA developed a new online treatment installation scheduling and completion tracking platform and obtained user testing and

feedback from the agency's plumbing contractors to support a faster rate of installations and increase reporting accuracy and timeliness.

OR Wells moved to cloud-based platform: Our primary well testing and treatment data and reporting platform, OR Wells, has been migrated from a server-based system to a cloud-based system by our partners in the Office of Information Services. This migration will enhance real-time data reporting and provide additional capabilities that were limited in its previous form, allowing OHA to perform more efficiently.

6.1.3.8 Community Partner Relations

6.1.3.8 Community Partner Relations

OBJECTIVE: Maintain partnerships with local community-based organizations and local governments and fund these partners to: inform the design and implementation of OHA's LUBGWMA domestic well safety activities and perform community education and outreach regarding health risks and how residents can access safe water services. *[6.1 Immediate Safe Drinking Water Services]*

Continuous

- Meet biweekly or as partners agree to carry out the actions above.
- OHA to execute annual funding agreements with Morrow and Umatilla County LPHAs and CBOs noted in the "Description" below.

Monitoring Progress:

- OHA will provide and receive updates at biweekly LUBGWMA partner meetings.

Progress Summary for 2025:

OHA hired and onboarded a Domestic Well Safety Coordinator who is a local resident of LUBGWMA: This staff member is primarily responsible for supporting the LUBGWMA Domestic Wells Public Health Project and, as time allows, contributing to the statewide OHA domestic well safety outreach and education program. They are a resident of the LUBGWMA, bilingual in Spanish, and have established strong working relationships with community--based organizations, LPHAs, contractors, and other project partners.

Consultants advise on strengthening partnerships: The Metropolitan Group conducted interviews with community partners of the LUBGWMA effort from January-April 2025 and submitted a report to OHA of the findings in May. The purpose of these sessions was to provide a space for partners to share their perspective on how the collective work is going, and what can still be improved. There were four themes synthesized from this report; 1) relationships are good and coordination has improved, however gaps remain. 2) a desire for greater recognition of partner contributions, 3) the need for simpler communication with community, and 4) unclear or varying expectations around roles and responsibilities within the effort. OHA continued a dialogue on the results of the report in a regularly held meeting in July 2025 and again in December. We will continue this dialogue with partners and implement changes to our collective work based on this feedback whenever possible.

Professional services contract with CBO Euvalcree: OHA and the CBO Euvalcree signed a client services contract starting in January 2025 with the period ending December 31, 2025. The organization provides a well water sample drop-off site at their office in Hermiston that they then deliver to OHA's contract laboratory for analysis. This organization is also providing outreach, engagement, and education materials to community members at local events in the LUBGWMA. The renewal of this contract for 2026 is under negotiation as of this writing.

Change in meeting frequency / workgroups: OHA created biweekly workgroups in several key areas of work in 2024: “Outreach & Engagement”, “Testing”, “Treatment”, “Water Delivery”, and “Data & Reporting”, which were intended to help organize and prioritize work, as well as increase collaboration among partners. In 2025, OHA eliminated most of these workgroups as identified tasks were completed and through partner feedback about the excessive number and frequency of meetings. OHA continues to convene the “Outreach and Engagement” workgroup on a monthly cadence, prioritizing the co-creation of outreach materials and implementing edits based on feedback provided from this collaboration space.

The LUBGWMA “Leadership Team” meetings, consisting of OHA staff, Local Public Health Authorities, and Community-based Organizations, met on a monthly cadence during 2025. Based on additional partner feedback, OHA will be changing the cadence of these meetings to once every quarter in 2026. OHA staff will continue to have monthly check-in meetings with individual CBOs, and LPHAs and will convene additional meetings as the work requires.

New grant funding cycle for LUBGWMA CBOs: OHA’s Community Engagement Team opened a Request for Grant Applications (RFGA) in early July to determine awardees for the next (Jan 1, 2026-June 30, 2027) Public Health Equity Grant cycle. This funding is available to all 501(c)3 nonprofit organizations, and a component of the award is related to outreach and education in the LUBGWMA. Three CBOs submitted applications to support local efforts. OHA will announce the grantees in January 2026.

Spanish language spaces for CBO partners: OHA is offering more one-on-one check ins, both virtually and in person, primarily in Spanish. Staff recognized that CBO partner organizations were not fully engaged during English language meetings and workgroups—particularly when Spanish was their primary language—even when interpretation services were available. These new Spanish-specific spaces provide opportunities to collaborate on local outreach efforts, answer questions, and offer training and resources to CBO partners. OHA has received positive feedback on these sessions and has observed increased participation and interest from CBO partners as a result.

Funding increase for LPHAs: Consistent with the desire to transition responsibilities for water sample collection from ODHS to Morrow and Umatilla County Health Departments, OHA has increased funding agreements to both agencies. These additional dollars will ensure both agencies are adequately resourced to take on water sample collection and scheduling for testing and retesting of domestic wells within LUBGWMA. Additionally, this change has led to more active partnership between both LPHAs as duties are actively coordinated and shared between Morrow and Umatilla County staff.

6.1.3.9 Demographic Study

6.1.3.9 Demographic Study	
OBJECTIVE: Survey LUBGWMA residents receiving safe water services to assess whether the program is equitably serving the community and comply with the state requirements to ask individuals receiving health services about their race, ethnicity, language and disability status. <i>[6.1 Immediate Safe Drinking Water Services]</i>	
Continuous	<ul style="list-style-type: none">- OHA will continue to survey newly added households.
Short-Term 2023-2027	<ul style="list-style-type: none">- By Jun 30, 2024, OHA sent mass emailing to all households receiving services before that date.- By Dec 31, 2024, OHA will complete a preliminary analysis of responses.

Monitoring Progress:

- OHA will track via project management tracking and demonstrate completion of initial analysis by publication on OHA's LUBGWMA websites, with periodic updates.

Progress Summary for 2025:

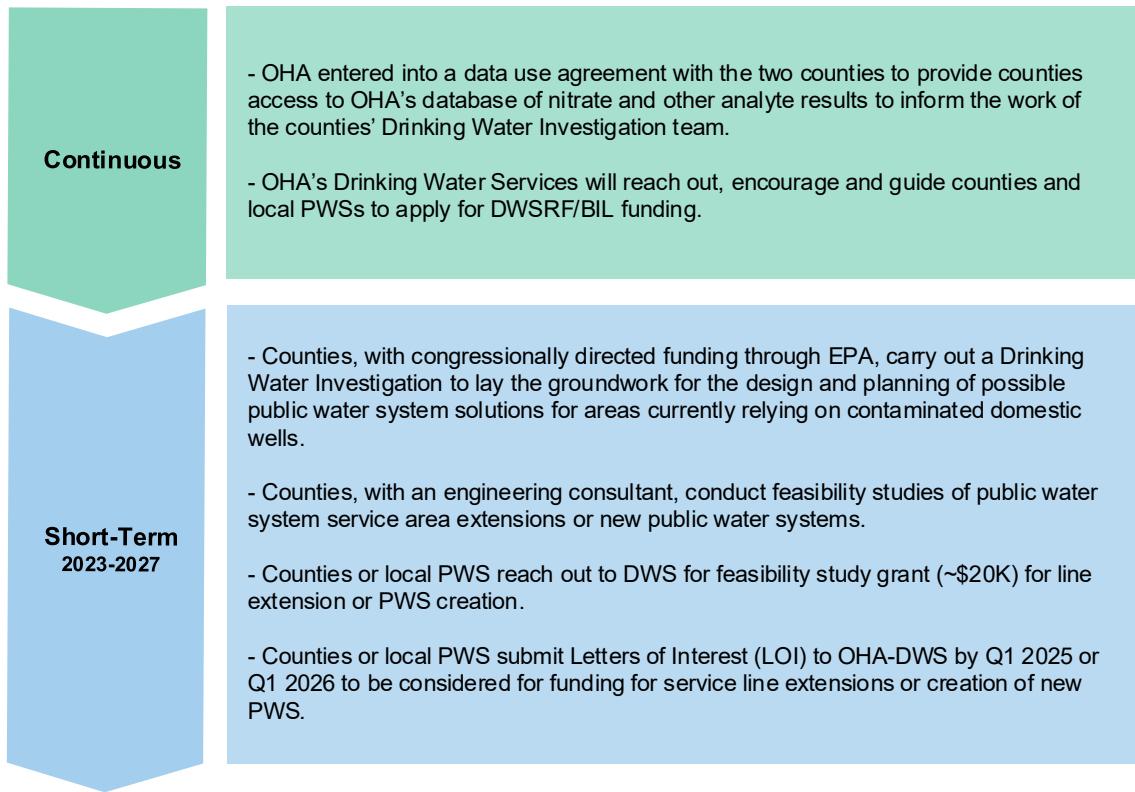
In February 2025, OHA made the decision, with consultation from partners attending the LUBGWMA Leadership meeting, to temporarily pause on the distribution of any survey requesting demographic data. OHA partners suggested that the survey would have a low response rate and may hurt engagement efforts generally if implemented. OHA will review this decision again in 2026.

6.2 Intermediate Term Public Water Systems Solutions

6.2.3.1 Technical and Funding Assistance for Public Water System Extension and Creation

6.2.3.1. Technical and Funding Assistance for Public Water System Extension and Creation

OBJECTIVE: To provide technical and funding assistance to Counties and Public Water Systems so that public water system service lines are extended or new systems are created to provide safe drinking water to residents with high nitrate levels in their private domestic wells. *[6.2 Intermediate Term Public Water Systems Solutions]*



Monitoring Progress:

- OHA will reach out to county planners and engineering consultant to see if Letters of Interest (LOI) for funding for service line extensions or PWS creation are ready to be submitted in Q1 2025 and Q1 2026. Also, OHA to see if any data or technical assistance are needed.

Progress Summary for 2025:

OHA staff engaged in stakeholder meetings and conversations to provide information about federal infrastructure funding but have not received letters of interest from the counties or PWSs for Drinking Water State Revolving Fund or Bipartisan Infrastructure Funding.

Below are the funding related activities occurred in 2025:

- Morrow County received two grants through Business Oregon's Water/Wastewater financing program in January 2025 to perform feasibility study to build a drinking water system and a wastewater system.
- In February 2025, OHA provided a letter of eligibility to the Morrow County for Congressionally Directed Spending. The county applied for CDS funding to support planning and development of a preliminary design for a well and water system. This project targets areas where connecting domestic wells to existing water systems is not feasible.
- OHA provided funding and Letter of Interest (LOI) information to the City of Boardman but haven't received a response yet.
- Morrow county and consultants are still in planning stages of developing a well-defined project/scope which is needed to submit an LOI and starting to develop an action plan for connecting households to public water systems.

6.2.3.2 Identifying Public Water Systems Not Currently under OHA Oversight

6.2.3.2 Identifying Public Water Systems Not Currently under OHA Oversight

OBJECTIVE: Ensure all Public Water Systems in the LUBGWMA are identified and meeting federal and state requirements for monitoring and treating nitrate. *[6.2 Intermediate Term Public Water Systems Solutions]*

Continuous

- By December 31, 2024, OHA to meet with county and state agency partners to strengthen outreach to identify PWS not under state oversight. Include criteria and requirements in annual trainings with local and state partners to identify new or previously unknown PWS.

Monitoring Progress:

- Reach out to local and state agency partners to identify previously new or unknown PWSs.
- Identified PWSs are listed in OHA-DWS online database and are complying with federal and state requirements.

Progress Summary for 2025:

OHA/EPA inspections of local businesses: OHA staff accompanied the EPA during inspections of local businesses to identify potential PWSs in 2024. The four systems identified have been added to OHA's inventory.

- Columbia Basin Onion (activated on 3/11/2025): A non-transient non-community system in Umatilla County with two connections serving 97 people. OHA required the facility to issue a Do Not Drink advisory due to nitrates exceeding the maximum contaminant level. The system has submitted plans for installation of a nitrate treatment system for OHA review.
<https://yourwater.oregon.gov/inventory.php?pwsno=95757>
- Beef Northwest Feeders (activated on 1/5/2025): A non-transient non-community system in Morrow County with six connections serving 68 people. This PWS has been on a "boil / do not drink" advisory for several months due to E. coli detections.
<https://yourwater.oregon.gov/inventory.php?pwsno=95756>
- Fewel Farms (activated on 3/24/2025): A transient non-community system in Umatilla County with 5 connections serving 25 people.
<https://yourwater.oregon.gov/inventory.php?pwsno=95758>
- Walchli Farms (activated on 5/28/25) was determined by OHA to not meet the Federal criteria for a PWS but was added to the inventory as an Oregon Very

Small (OVS) system, serving a population of 20 with 3 connections.

<https://yourwater.oregon.gov/inventory.php?pwsno=06345>

The local Department of Agriculture partner also identified a new public water system under construction in the LUBGWMA. It was added to OHA's inventory in January 2026. Columbia River Dairy - North <https://yourwater.oregon.gov/inventory.php?pwsno=95778> OHA is continuing efforts to identify any new or unknown PWSs that should be added to the PWS inventory.