



# Oregon

Tina Kotek, Governor

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Rick Cowlshaw  
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RE: DEQ biennial review letter – 2026 Clackamas Subbasin Agricultural Water Quality Management Area Plan

Dear Rick Cowlshaw:

Thank you for the opportunity to participate in the Light Biennial Review process for the Clackamas Subbasin Agricultural Water Quality Management Area Plan. The Local Advisory Committee meeting was held on March 25, 2026, and included presentations by the Oregon Department of Agriculture, Clackamas Soil and Water Conservation District, Natural Resources Conservation Service, and Department of Environmental Quality.

ODA is a designated management agency in three Willamette Basin Total Maximum Daily Loads that apply to the management area, including the 2019 Mercury TMDL (which applies to all waterbodies in the management area), the 2006 Willamette Basin Bacteria TMDL, and the 2024 Willamette Subbasins Temperature Replacement TMDL. Additional impairments are present in the basin for parameters that are not currently addressed by TMDLs. Taking into consideration available water quality information, impairments and TMDLs, the following recommendations for water quality are considered top priorities for the management area:

## **I. Priority Water Quality Parameters and Recommendations for the Clackamas Agriculture Area**

### **a. Temperature**

Temperature monitoring in the management area shows stream temperatures continue to exceed water quality standards for both the spawning period and year-round.

Recommended Action: Provide measurable results to document how implementation actions are or will achieve temperature standards. These metrics may include specific miles of streamside vegetation planted, livestock exclusion fencing installed, and the

progress on shade targets of maturing, restored riparian areas. Implementation priorities should continue to include protecting, maintaining, and establishing streamside vegetation to provide water quality functions and achieve site potential shade.

#### b. Sediment and Erosion

The U.S. Environmental Protection Agency assigned an 88 percent reduction in total mercury to nonpoint sources including agriculture in the Clackamas subbasin. ODA is required to implement sediment and erosion controls to reduce mercury loading to waterbodies in the management area.

Recommended actions: DEQ encourages ODA to include information and updates in the area plan about ODA's Mercury TMDL implementation plan and keep LAC members informed about implementation strategies, measurable objectives and progress, including sharing annual TMDL implementation reports and updates on bare ground assessments.

#### c. Bacteria

Recommended actions: Support continued implementation of best management practices for manure management, heavy use areas, livestock exclusion, riparian planting to prevent and filter runoff, and nutrient reduction in the management area to prevent degradation of land condition and water quality.

## **II. Additional Recommendations**

DEQ requests that the following recommendations be incorporated into the area plan.

#### a. Timelines

Identify ODA's timeline for fully implementing all the BMPs recommended for the management area in order to meet TMDL load allocations. A timeline for BMP implementation will support adaptive management as well as communicate implementation expectations to agricultural growers and land managers.

#### b. Measurable Objectives

DEQ appreciates that ODA has developed measurable objectives for the management area associated with priority water quality impairments or concerns. DEQ recommends that ODA incorporate effectiveness monitoring for the identified measurable objectives.

#### c. Monitoring

There is a lack of available data present for the management area. DEQ recommends that ODA support SWCD monitoring efforts and ensure that the soil and water conservation districts have sufficient resources to collect monitoring data that meets DEQ's sampling methodology.

#### d. Drinking Water Protection

DEQ recommends that ODA develop measurable objectives throughout the management area for strategies that protect drinking water source areas. Strategies should be specific to agricultural activities in the management area.

e. Local Advisory Committee Engagement

ODA identified LAC engagement as an essential component for plan success. DEQ appreciates that ODA prioritizes engagement and recruitment of members.

DEQ also encourages ODA to expand its search for members and increase diversity in all areas of membership. ODA should consider objectives for soliciting diverse feedback, barriers to participation, and strategies to overcome participation barriers.

If you have any question or concerns about the enclosed comments for the Clackamas Subbasin, please contact Sarah Mattecheck at 503-816-6923, [sarah.mattecheck@deq.oregon.gov](mailto:sarah.mattecheck@deq.oregon.gov).

To facilitate community engagement on water quality within the agricultural water quality management area, this letter will be posted on [DEQ's Nonpoint Source Implementation](#) web page under the Agricultural land tab.

Sincerely,

Sarah Mattecheck  
Sandy, Clackamas, and Molalla Basin Coordinator

ec: Theresa Burcsu Watersheds and 401 Section Manager, DEQ Northwest Region  
Steve Mrazik, Watersheds Manager, DEQ Headquarters