



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
Northwest Region Portland Office/Water Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232  
(503) 229-5696  
FAX (503) 229-6124  
TTY 711

February 14, 2025

Rick Cowlshaw, Regional Water Quality Specialist (North Coast and North Willamette Valley Region)  
Oregon Department of Agriculture – Water Quality Program  
635 Capitol Way NE  
Salem, OR 97301-2532

RE: Updated DEQ biennial review letter – 2024 Sandy Subbasins Agricultural Water Quality Management Area Plan

Dear Mr. Cowlshaw:

*In our previously submitted letter on October 2, 2024, we incorrectly identified the number of assessed temperature sites and are providing an update with the correct number of temperature monitoring sites and the status as attaining or not attaining. The corrected section is highlighted below.*

Thank you for the opportunity to read the draft 2024 Sandy Subbasins Agricultural Water Quality Management Area Plan (area plan) and participate in the biennial area plan review. The comments submitted here are based on a partial review of the document.

ODA is a designated management agency in the 2024 Lower Columbia-Sandy Subbasin Temperature TMDL and the 2005 Sandy River Basin TMDLs for bacteria. Taking into consideration available water quality information, impairments and TMDLs, the following recommendations for water quality are considered top priorities for the Sandy Subbasins management area:

## I. Priority Water Quality Parameters and Recommendations

### a. Temperature

Continuous temperature monitoring in the management area shows stream temperatures continue to exceed water quality standards (DEQ, 2022 [Water Quality Status and Trends](#)). The status is not attaining for 52 out of 69 water monitoring stations that were assessed for temperature. Of the 17 stations that are meeting the temperature standard, 6 have a degrading trend.

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 shade targets established in the Lower Columbia-Sandy Subbasins TMDL.

### b. Bacteria

There continues to be limited data available for bacteria in the management area. These data are concentrated in the lower portion of the basin, in the Beaver Creek Watershed.

East Multnomah Soil and Water Conservation District has conducted monitoring of bacteria levels at two sites in the past, however, there is insufficient data to establish water quality status and trends. These data are helpful for outreach and education with landowners and managers but should be presented as informational only.

Recommended Action: Support continued implementation of BMPs for manure management; heavy use areas; livestock exclusion; riparian planting to prevent and filter runoff; control erosion in channels, croplands and uplands; and nutrient reduction in the management area to prevent degradation of land condition and water quality.

## **II. Observations and Recommendations**

- It is encouraging to see that additional landowner engagement activities are proposed and planned. Landowner participation is one of the keys for making progress towards attainment of water quality targets.
- DEQ strongly encourages ODA to consider diversity goals and targets, barriers to landowner participation, and to work to overcome participation barriers.
- It is discouraging that temperature is not addressed in the Sandy Subbasins Area Plan and that measurable objectives are limited to bacteria monitoring in a single watershed.
- It is discouraging that bacteria monitoring data continues to be insufficient for assessment, so DEQ encourages ODA to ensure SWCDs have the resources they need to conduct monitoring data that meets DEQ's sampling methodology.

## **III. 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.

Timelines and interim milestones are important components of resource planning and assessing incremental progress. Timelines are also needed for adaptive management, which requires developing methods to evaluate whether implementation actions are performing as expected over time.

Prepare a communication plan to describe timeline and BMP implementation expectations.

### **b. Measurable Objectives**

DEQ recommends that ODA develop measurable objectives associated with priority water quality impairments or concerns, including implementation benchmarks to help gauge progress in meeting all TMDL allocations.

### **c. 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.

Agricultural activities that do not follow established BMPs have the potential to negatively impact drinking water source areas for public water systems and private domestic wells. DEQ provides a Drinking Water Resource Update for each management area to inform Local Advisory Committees of drinking water resources in relation to agricultural land use and practices.

d. **Local Advisory Committee (LAC) Engagement**

ODA identified LAC engagement as an essential component for plan success. DEQ encourages ODA to continue to support membership and member succession over time. Succession planning provides an excellent opportunity to evaluate and increase diversity in all areas of membership. As part of succession efforts, DEQ recommends that ODA include diversity goals and targets, barriers to participation, and strategies to overcome participation barriers. Potential venues to reach a more diverse set of participants could include:

- Outreach to a wide range of small and medium producers and potential members by engaging through the farmers market community network in the Portland-Metro area (e.g. Hollywood Farmers Market, Montavilla Farmers Market)
- Reach out to Tribal organizations that represent and provide services to tribal members. This may provide an opportunity to recruit members through organizational networks because Tribal community members may not know about these engagement opportunities. Organizations that may be able to assist with communicating opportunities include: Columbia River Inter-Tribal Fish Commission, Portland State University Institute for Tribal Government and Affiliated Tribes of Northwest Indians.
- Reach out to organizations that service and promote underrepresented agricultural producers. For example: Adelante Mujeres, Black Food Sovereignty Coalition, Oregon Food Bank's Pathways to Farming Program, and Mudbone Grown.

If you have any question or concerns about the enclosed comments for the Sandy Subbasins, please contact Sarah Mattechcheck [sarah.mattechcheck@deq.oregon.gov](mailto:sarah.mattechcheck@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 webpage under the Nonpoint Source Pollution section's [Area Plan Reviews and Comments page](#).

Sincerely,

*Sarah Mattechcheck*

Sarah Mattechcheck  
Sandy, Clackamas, and Molalla Basin Coordinator

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