

Biennial Review

April 13, 2021

Cheryl Hummon
Oregon Department of Agriculture
Agricultural Water Quality Program
635 Capitol Street NE
Salem, OR 97301

Dear Cheryl Hummon:

Thank you for the opportunity to participate in the 2021 Local Advisory Committee (LAC) meeting for the Sandy Basin light review.

The LAC meeting held on March 31, 2021 included presentations by the Oregon Department of Agriculture, Clackamas Soil and Water Conservation District and the East Multnomah Soil and Water Conservation District (EMSWCD).

DEQ considers the following water quality issues top priorities for the Sandy Basin management area:

Temperature

- Continuous temperature monitoring in the management area shows stream temperatures continue to exceed water quality standards. The DEQ 2020 Water Quality Status and Trends Report shows a degrading trend for 15 monitoring locations. One station shows a steady trend, and 39 are unassessed. The water quality status of 15 stations are not attaining, while 12 are attaining. Twenty-eight (28) stations have unassessed status.
- Implementation priorities should continue to include protecting, maintaining and establishing riparian vegetation to provide water quality functions and achieve shade targets established in the Sandy Basin Total Maximum Daily Load (TMDL).
- Provide measurable results for how these temperature standards are being achieved, this may include specific miles of riparian planted, livestock exclusion fencing installed, and the progress on shade targets of maturing restored riparian areas.

Bacteria

- Currently there is limited data available for bacteria in the management area, and it is largely concentrated in the lower portion of the basin. While the EMSWCD is currently monitoring bacteria levels at two sites, the data they are collecting currently cannot be used 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.
- Samples must be collected in accordance with DEQ's methodology in order to determine whether water quality standards are being met.
As a measurable data collection effort, DEQ encourages ODA to provide additional resources and support to the EMSWCD for monitoring that can be utilized by DEQ to establish water quality status and trends.
- Prioritize continued implementation of best management practices (BMPs) for manure management, livestock exclusion, and nutrient reduction in the Sandy River Basin.

The area plan for the Sandy Basin was not updated or revised as part of ODA's light review process. In preparation for the next biennial review, DEQ requests that the following recommendations be incorporated into the area plan.

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Timelines

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.

- Identify ODA's timeline for having all recommended BMPs fully implemented. A timeline for BMP implementation will support adaptive management as well as communicate implementation expectations to agricultural growers and managers.
- Prepare a communication plan to describe timeline and BMP implementation expectations.

Measurable Objectives

Measurable objectives provide a metric that can be used to measure and track progress. This is especially critical for outcome-based programs, which rely on quantifying whether or not objectives are being achieved.

- The EMSWCD has identified measurable objectives for the Focus Area (FA), Beaver Creek. DEQ recommends that ODA develop measurable objectives throughout the management area, including but not limited to FAs.
- DEQ recommends that ODA support the SWCDs monitoring efforts by ensuring they have the resources to collect monitoring that meets DEQ's sampling methodology.

Local Advisory Committee (LAC) Engagement

ODA has identified engagement with the LAC as an important component for plan success. Given the low attendance at this year's meeting, DEQ would like ODA to focus on engagement and recruitment of members to educate and inform about the role that agricultural lands play in water quality degradation, improvement, and as monitoring sites in tracking progress over time. DEQ strongly encourages ODA to expand its search for members, and by increasing diversity in all areas of membership.

ODA should consider the following and submit to DEQ an analysis of:

- Diversity goals and targets
- Barriers to participation
- Strategies to overcome participation barriers

Potential venues to reach a more diverse set of participants could include:

- Reach 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
 - 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

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Soil and Water Conservation District Outreach

DEQ acknowledges that limited resources and the COVID-19 pandemic interrupted implementation efforts, including outreach and education. DEQ appreciated the written summary provided by the Clackamas SWCD's outreach and engagement activities, and would like more detail and measurable objectives for outreach and education in the future from all partners. This summary should include:

- Summary of identification method and engagement of key landowners
- Methods used to contact and engage landowners
- Evaluation of effectiveness of engagement and outreach methods
- Results from engagement and outreach (e.g. number of responses received, number of participating landowners)
- Consideration of utilizing multi-lingual outreach materials and materials that are designed to reach a wider audience.

If you have any question or concerns about the enclosed comments, please contact Roxann Nayar at (503) 229-6414, nayar.roxy@deq.state.or.us.

Sincerely,



Roxann Nayar
DEQ Sandy Basin Coordinator

ec: Gene Foster, DEQ Watersheds Manager
Steve Mrazik, DEQ Water Quality Manager
Ryan Michie, DEQ Senior Water Quality Analyst