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503.986.4550 | Oregon.gov/ODA

To: Jonathan Sandau, Deputy Director, Oregon Department of Agriculture
Subject: Summary Report on Public Comment
From: Sunny Summers
Date: June 1, 2026

Rulemaking Public Comment Summary - The purpose of this rulemaking public comment period was to allow public comment on updates the Willow Creek Management Area rules.

Public Hearing – ODA held a public hearing on April 23, 2026. No verbal comments were received.

Summary of Written Comments - ODA accepted written testimony from the public through 5:00 p.m. on May 1, 2026. One written comment was received and is available on the next page.

Dated this 1st day of June 2026.

A handwritten signature in black ink, appearing to read 'Sunny Summers', is written over a horizontal line.

Sunny Summers, Hearings Officer
Oregon Department of Agriculture
635 Capitol Street NE
Salem, OR 97301
sunny.summers@oda.oregon.gov
503.400.4196

Comments

Commenter	Comment	Response
Laura N.	Thank you for sharing the Biennial Review and information regarding the current public comment period. I would like to submit the following for inclusion in the formal rulemaking record. As implementation of OAR 603-095 continues, I want to emphasize the importance of ensuring that compliance expectations remain tied to demonstrable risk and actual pathways to water quality impact. Small, contained agricultural processing operations that do not discharge to surface or groundwater and that manage nutrients through controlled systems represent a fundamentally different risk profile than operations involving open discharge, irrigation return flows, or unmanaged waste. Given that the Area Plan itself is non-regulatory (ORS 568.912), clarity in how “reasonable control” is interpreted under OAR 603-095-2840 is especially important. Application of the rules should remain grounded in site-specific conditions and verifiable contributions to water quality impairment. Additionally, as groundwater nitrate concerns are addressed within the LUBGWMA, distinguishing between legacy loading and current contributions will be important for fair and effective implementation. Please include this comment in the formal rulemaking record. Thank you for your time and consideration.	Thank you for your comments.

