



**Portland General Electric**  
121 SW Salmon Street • Portland, OR 97204

March 29, 2024  
**ELECTRONICALLY FILED**

Ms. Valerie Thompson  
Oregon Department of Environmental Quality  
Northwest Region Water Quality  
700 NE Multnomah St., Ste. 600  
Portland, OR 97232

**Re: Project No. 2195 – Clackamas River Hydroelectric Project  
Mercury TMDL Implementation Plan, 2023 Annual Report**

Dear Ms. Thompson:

On December 30, 2019 and revised on February 4, 2021, the Environmental Protection Agency (EPA) established the Willamette Basin Mercury Total Maximum Daily Load (TMDL), which replaced Oregon Department of Environmental Quality's (ODEQ) 2006 Willamette Basin Mercury TMDL. The EPA's 2019 TMDL is currently in effect. The ODEQ has set a Mercury TMDL for the Willamette Basin and includes a Water Quality Management Plan (WQMP) that identifies how the TMDLs will be implemented. The WQMP assigns PGE as a Designated Management Agency (DMA) responsible for evaluating and implementing mercury reduction strategies associated with lands draining into their reservoirs and impacts from reservoir operations, with particular consideration for factors affecting methylation rates.

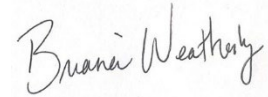
The WQMP identifies expectations for a Mercury Total Maximum Daily Load Implementation Plan (here after IP), requiring PGE and other reservoir operators to assess factors affecting methylation rates in their reservoirs to establish baseline conditions for use in adaptive management and to inform evaluations of site-specific approaches to reduce methylmercury (MeHg) production. As a DMA, PGE is required under Oregon Administrative Rule (OAR) 340-42-0080 to prepare an IP for submission to ODEQ for review and approval by August 17, 2023. The IP requires PGE to prepare an annual report documenting the results of work conducted for each year that monitoring is completed.

The purpose of this letter is to inform ODEQ that in 2023 PGE completed the development of an IP. The IP was submitted to ODEQ on June 10, 2023, and approved by ODEQ on October 10, 2023. In 2024, PGE will begin data collection and sampling outlined in Phase 1 of the IP with an annual report due to ODEQ by April 1, 2025.

This letter has been filed electronically. [REDACTED]

[REDACTED]

Sincerely,



Hydropower FERC License Manager  
Portland General Electric