City of Falls City, OR

TMDL 5TH YEAR EVALUATION AND ASSESSMENT 2018 – 2022

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AJ Foscoli
City Manager
Falls City, Oregon

ACRONYMS

BMPs	Best Management Practices
City	City of Falls City
CESCL	Certified Erosion and Sediment Control Lead
CS	Construction Site Runoff
CWA	Clean Water Act
DEQ	(Oregon) Department of Environmental Quality
DMA	Designated Management Agency
ESCP	Erosion and Sediment Control Plan
EPA	United States Environmental Protection Agency
GH	Good Housekeeping in Municipal Operations
IDDE	Illicit Discharge Detection and Elimination
LID	Low Impact Development
LUCS	Land Use Compatibility Statement
LWI	Local Wetland Inventory
MCM	Minimum Control Measure (aka Stormwater Controls)
NPDES	National Pollutant Discharge Elimination System
NPS	Nonpoint Sources (not under an NPDES permit)
NWI	National Wetland Inventory
OAR	Oregon Administrative Rules
ODA	Oregon Department of Agriculture
ODFW	Oregon Department of Fish and Wildlife
PC	Post-Construction Runoff Control in New and Re-development
PE	Public Education
PI	Public Involvement
SWPPP	Stormwater Pollution Prevention Plan
SWMP	Stormwater Management Plan
TMDL	Total Maximum Daily Load
TSS	Total Suspended Solids
UIC	Underground Injection Control Device
USGS	United States Geological Survey
WQMP	Water Quality Management Plan

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1.0 Purpose

The City of Falls City was identified as a Designated Management Agency (DMA) in the *2006 Willamette Basin TMDL* (Total Maximum Daily Load) *and WQMP* (Water Quality Management Plan). The WQMP states that:

Following approval of the TMDL implementation plan, DMAs will be expected to submit to ODEQ an annual status report briefly describing the status of management strategies that implement TMDL pollutant allocations or reductions. Every fifth year DMAs will need to submit an evaluation report. The report will describe the effectiveness of the management strategies identified in the TMDL Implementation Plan and put into place during the preceding four years. The report will indicate whether implementation of their plan is adequately meeting the pollutant reduction goals. If they determine it does not, the report will describe the steps they will take to modify their plan.

This document serves as the 5th Year Evaluation report referenced in the 2006 Willamette Basin WQMP. The City also submitted a 5th Year Evaluation in 2012.

1.1 Introduction

The City of Falls City submitted their original TMDL Implementation Plan to the Department of Environmental Quality (DEQ), in 2008. The plan was developed in response to the *2006 Willamette Basin TMDL and WQMP*. The plan was revised in September 2022 as a result of the *2019 Final Revised Willamette Basin Mercury TMDL and WQMP,* as was required by DEQ.

The 2022 Revised TMDL Implementation Plan state that, *the original TMDL Implementation Plan, submitted in 2008 provided a broad range of activities that the City had or was planning to implement. The City has attempted to stay current with proposed BMPs and activities and while there have been some successes, and there are a number of failures as well.* As a result the City revised the existing plan in its entirety in 2022.

This 5th Year Evaluation covers progress on tasks listed in the original plan, and the revised plan from the period of 6/30/18 to 10/31/22.

Contents

Appendix A – Progress documentation for tasks listed in the original implementation plan

Appendix B – Table that contains revisions to the original plan as submitted in response to the Mercury TMDL.

Appendix C – 2022 Revised Matrix

The progress for the original tasks are listed in Appendix A. Appendix B includes the revisions to tasks submitted with the revised plan in 09/23. Appendix C is the 2022 Revised Matrix which the City is currently working from.

1.2 Program Overview

Falls City has been implementing its TMDL Program since 2008. Little noteworthy progress has been made since its development. Given the small size of the City and limited staffing levels, it is not surprising the program has not gathered significant interest or support.

The City is putting effort into elevating activities and recordkeeping through utilization of a consultant to assist with program design. The 2022 revised plan has been reviewed and approved by DEQ. The City has been willing to explore new practices and ideas that have been introduced with the revised plan.

1.3 Summary of 5 Year Activity

A review of program records indicate that a substantial amount of items that were planned for the City were not completed. Although the City made an effort to submit annual reports, the emphasis for making progress was limited. It is very apparent that there has been no real expertise within the staff which is clearly demonstrated when looking closely at reporting and recordkeeping. The Tasks listed in the 2018 TMDL Implementation Plan lack clarity in expected goals and milestones. Hopefully, the revision of the plan in 2022 will provide more clarity for staff.

DEQ has had communication with the City over the review period.

1.4 Activities from 6/30/22 to 10/31/22

Falls City administrative staffing changes in 2021/2022 lead the City to seek outside assistance for TMDL Program elements. A consultant was hired in May 2022 to assist with the Revised Mercury TMDL requirements. In the process of meeting those requirements, the City moved toward revising their plan in its entirety. City staff worked diligently with the consultant over the summer months of 2022 to develop a comprehensive plan that would meet the conditions of the Revised TMDL and the needs of the City of Falls. The majority of TMDL Tasks were revised and some new BMPs created. See Appendix B.

The City posted the Revised TMDL Implementation Plan on the website in September 2023.and can be viewed under the ‘Governing Documents’ link from the home page. The City participated in 3 meetings with the consultant in the months preceding the submittal of the Revised Plan. A kick-off meeting was held on October 5, 2022 with staff to discuss the goals for the year and the process moving forward. The City has obviously accomplished more since the end of October 2022 which will be covered in the yearly report due to DEQ on Dec. 1, 2023.

2.0 Program Strengths

Utilize Consultant Services - Falls City wisely chose to seek assistance from consulting services to guide the City in development of the material for the mercury TMDL. Funding for staff with environmental training is simply not available, and the City’s endeavors to bring in assistance should be commended.

Because the implementation is very new, it is difficult to identify strengths and weaknesses. Those elements will become more apparent later in the 5 year review term.

2.1 Program Weaknesses

Staffing – According to the 5th Year Evaluation submitted in 2012, "*funding for implementation of desired projects has been the largest barrier. Limited staffing and time is also a large barrier for a city with only 4 paid staff. Also the public's willingness to participate and cooperate has been a challenge. Lack of knowledge, training and resources such as partnerships also challenge us".*

Staffing levels are obviously limited in number with many employees wearing more than 1 hat. The City's population is approximately 1100. It follows that funding would be limited for a community of this size, and the funding for personnel with environmental knowledge is not feasible. The City has not demonstrated that the public is unwilling to participate in program elements, or that partnerships are a challenge. There is room for improvement in this area.

Recordkeeping – The City has not maintained comprehensive records for the TMDL Program. Compiling the statistics for this report was challenging at best. It is apparent that those who have conducted annual reporting in the past do not understand the TMDL program which has resulted in slight changes to BMP verbiage from year to year. The annual report compiled for the 2022/2023 will be completed by the consultant, which should serve as a template for subsequent years.

Lack of Program Progress - Falls City is a small, rural community that has a population that remains fairly constant given its small size. The City and residents don't expect to see a tremendous amount of change from year to year. Staff will need to embrace this program and move forward to achieve successes. A small population does not absolve the City from regulations. There are existing opportunities that the City has not yet embraced.

The City has a number of agencies to partner with including Dallas, Polk County, Polk County Soil and Water Conservation District, and more. While some limited conversation has occurred with these groups, Falls City is not attempting to take advantage of the opportunities that might be created by a larger organization.

In regard to opportunities, the Little Luckiamute River runs through the middle of Falls City. The stream corridor is in relatively good health even for a small town. The City should highlight this important resource and gather community support for enhancement and protection.

2.2 Program Modifications

As discussed earlier in this evaluation, the implementation was revised in 2022 as a response to the mercury TMDL. The changes to the program were designed to 1) reduce redundancy, 2) include BMPs that are designed to address the pollutants of concern in a useful way, and 3) create BMPs that can be more easily implemented by staff. Because the program was so recently revised, no major modifications are proposed at this time. Some minor wording changes have been made to the matrix, which are identified in Appendix C.

3.0 Final Comments

Every attempt has been made to provide a clear picture of the evaluation period, but lack of comprehensive records has been a factor in report clarity. The City has every intention of correction this issue for annual reporting and 5th year evaluations moving forward. The City is making significant strides toward implementing positive changes and looks forward to reporting successful implementation practices.

APPENDIX A

Original BMPs / Progress for Review Period

Task #	Description	5th Yr Period Findings
#1 T	Protect and enhance riparian corridors on private land through development code to protect existing vegetation	No applicable development occurred during the review period
#2 T	SOLV community river clean-up	275 lbs of debris and garbage removed
#3 T	Protect and enhance riparian corridors on public land	Dutch Creek Bridge in November 2019. Little documentable progress on this Task
#4 T	Tree City USA	Arbor Day events held each year with the exception of 2020 due to Covid
#5 T	Identify areas and partner with LWC and Falls City High School on riparian restoration	Some partnership work has occurred over the review period with Polk County, the Luckiamute WC, etc. Progress is limited
#6 T	Public education and outreach regarding importance of riparian zone conservation/restoration.	Students were utilized to remove invasive plants in Parks. A restoration guide is posted on the website: Parks | City of Falls City (fallscityoregon.gov)
#7 TB	Maintain Low Effluent Temperatures.	Wastewater discharge limited to wet months. Average temperature 58* F.
#8 B	Implement Improvements identified in the Wastewater Facility Plan	4.4 million secured in funds. In compliance with archeological, environmental, and wetland permit requirements. Consultant for master planning identified. Land acquisition for 17 acre lagoon site underway in 2022. Design Phase 85% complete.
#9 B	Reduce illicit municipal waste discharge	Public Works Employees maintain certification. Influent and Effluent are tested at least bi-monthly.
#10 B	Implements Low impact development methods to slow, treat, and infiltrate storm water runoff	City was looking for a grant to fund this BMP, but suitable funding was not identified.
#11 B	Stormwater Master Plan	The City is still working toward development of the master plan.
#12 B	Require new development to manage, treat and reduce stormwater runoff.	Code requires the elements of this BMP, but the City has not indicated if any project occurred.

#13 B	Stormwater and illicit discharge education and outreach	Stormwater education material sent to 450 homes in 2021. The revised implementation plan was posted in Fall 2022
#14 B	Public education and outreach regarding proper septic maintenance and how to detect failing septic systems.	Septic do's and don'ts brochures available at City Hall. Tanks pumped on five year schedule or at 25% sludge. Commercial unit pumped twice per year. Home owner information regarding septic assistance loans available at city hall or on the website.
#15 B	Reduce the amount of pet and other domestic animal waste that is not being disposed of properly	3 stations maintained and filled regularly, approximately 6000 bags are purchased annually
#16 B	Install park improvements such as signage, kiosks and trash receptacles.	Pocket parks signage completed in 2021.
#17 B	Reduce litter and solid waste	A Spring Clean-up event is held annually.
#18 B	Install park improvements, portable or permanent restrooms	Bathrooms are located at George Kitchen Park. 2 Porta-potties are located in Michael Harding Park for the summer months. A Porta-Potty is made available for the Spring Clean-up event.
#19 M	Street sweeping and public outreach to reduce littering. Placement of trash receptacles.	Contract with the City of Dallas for monthly sweeping service. 10 Trash receptacles are located throughout the city in high volume areas. Spring Clean up event provides the community a resource to dispose of household, e-waste and vegetation control.
#20 M	Limit erosion and sedimentation	This applies only to steep slopes. No applicable permits
#21 M	Confirm receipt of 1200-C	According to previous reports there was no development in Falls City that would have triggered this BMP

T= Temperature, M=Mercury, B=Bacteria

APPENDIX B

2022 Revisions to Original TMDL

Task #	Original BMP Description	Revision / Status
#1 T	Protect and enhance riparian corridors on private land through development code to protect existing vegetation	Reworded – Develop a setback for development in CS-2, ordinance development
#2 T	SOLV community river clean-up	Retained BMP PE-2
#3 T	Protect and enhance riparian corridors on public land	See Task #5
#4 T	Tree City USA	Retained
#5 T	Identify areas and partner with LWC and Falls City High School on riparian restoration	Reworded – Combine Task #3, #5, and #6 Covered in PE-5
#6 T	Public education and outreach regarding importance of riparian zone conservation/restoration.	See Task #5
#7 TB	Maintain Low Effluent Temperatures.	Removed – the City is regulated under its NPDES permit
#8 B	Implement Improvements identified in the Wastewater Facility Plan	Removed – the City is regulated under its NPDES permit
#9 B	Reduce illicit municipal waste discharge	Removed – replaced by ID BMPs
#10 B	Implements Low impact development methods to slow, treat, and infiltrate storm water runoff	Addressed under PC BMPs
#11 B	Stormwater Master Plan	Retained BMP ID-7
#12 B	Require new development to manage, treat and reduce stormwater runoff.	Addressed under PC-1 BMPs
#13 B	Stormwater and illicit discharge education and outreach	Removed – covered under PE BMPs for all parameters
#14 B	Public education and outreach regarding proper septic maintenance and how to detect failing septic systems.	Reworded – covered under PE-8 for bacteria
#15 B	Reduce the amount of pet and other domestic animal waste that is not being disposed of properly	Reworded – covered under PE-7 for bacteria
#16 B	Install park improvements such as signage, kiosks and trash receptacles.	Removed – covered under task #15. See BMP
#17 B	Reduce litter and solid waste	Removed – covered under BMPs for all parameters
#18 B	Install park improvements, portable or permanent restrooms	Completed – remove this task
#19 M	Street sweeping and public outreach to reduce littering. Placement of trash receptacles.	Rewritten under GH-3 in matrix
#20 M	Limit erosion and sedimentation	Rewritten to require erosion control throughout the City. BMPs under CS BMPs in matrix
#21 M	Confirm receipt of 1200-C	No Changes. Included in CS-1

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City of Falls City TMDL 5th Yr Evaluation and Assessment								
BMP#	**Source** *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	**Strategy** *What will be done to control or reduce pollutant from source?*	**How** *Specifically, how will this be done?*	**Fiscal Considerations** *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	**Measure** *How will successful implementation or completion be measured?*	**Timing** *When will the strategy be completed?*	**Milestone** *What intermediate goals will be achieved and by when. Measure success*	**Status**
POLLUTANT: Mercury								
MCM #1 Public Outreach								
PE-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Post relevant PE materials to the City's website and other distribution methods	Utilize material from portfolio to make FAQ sheets, brochures, etc	Staff and consultant	Document materials and topics covered annually and discuss in annual report	Ongoing annually	Completion of multiple documents on the website for the public to access. Update routinely	**Completed.**
PE-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	SOLV Community River Clean up	City Staff and volunteers partner with SOLV	Staff time	Document event, date, number of participants and discuss in annual report	Ongoing annually	Advertise for event and record events Continue to support SOLV events	
PE-3	Runoff from soil disturbance and direct discharge to waterway from riparian area	Participate in local annual event	Host a booth or event and document materials	Set aside small fund for promotional items	Document date of events and participation	Ongoing annually	Report number of materials handed out, date, and participation	
PE-4	Runoff from soil disturbance and direct discharge to waterway from riparian area	Tree City USA	Re-establish this activity. Arbor Day Celebration, outreach material.	Staff time and budgeting	Discuss event and educational material in annual report	Ongoing annually	Advertize the event, develop education material	

BMP#	**Source** *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	**Strategy** *What will be done to control or reduce pollutant from source?*	**How** *Specifically, how will this be done?*	**Fiscal Considerations** *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	**Measure** *How will successful implementation or completion be measured?*	**Timing** *When will the strategy be completed?*	**Milestone** *What intermediate goals will be achieved and by when. Measure success*	**Status**
PE-5	Runoff from soil disturbance and direct discharge to waterway from riparian area	Partner with local watershed council, SWCD, university, etc	Attend meetings, network, partner	Staff time and consultant	Report annual progress in yearly report	Ongoing annually	Document progress annually	
PE-6	Runoff from soil disturbance and direct discharge to waterway from riparian area	Coordinate with the development community and provide educational material	Provide materials on the website and conduct site visits	Staff time and consultant	Report progress in yearly report	Ongoing to commence in 2023/2024	Develop a flyer for builders/developers. Use in field and post on website	Completed.
MCM #2 Public Involvement								
PI-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Maintain a website to post the most current environmental educational information	Post the TMDL Plan on the City website with educational material	Staff time	Post the plan in 2022 and post plan reports submitted to DEQ annually	To occur **each year** starting in 2022	Post new and updated material annually and report	Completed.
PI-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	Annual presentation to City Council	Work Session presentation	Consultant and staff	Report progress in yearly report	To occur each year starting in 2022/2023	Content and date to be included in annual report	
MCM #3 Illicit Discharge Detection and Elimination								
ID-1	Runoff from soil disturbance and impervious area	Update the City's GIS system to include new stormwater data	Review WQMP to meet DEQ requirements	Staff time	Document annual updates	2032/2033	Track annual assets (ie. outfalls, catchbasins, etc) Work with Polk County if possible	

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ID-2	Runoff from soil disturbance and impervious area	Develop an inventory of stormwater assets and facilities	Field verify stormwater system to collect and locate assets and facilities	Staff time	Report progress in annual report	Ongoing annually	Collect information annually and keep records of locations, type, function, condition	
ID-3	Runoff from soil disturbance and impervious area	Develop an ordinance that prohibits non-stormwater discharges into the stormwater system	Utilize ordinances and programs from other agencies	Staff time involving legal	Provide DEQ annual progress on this BMP in the annual report	Complete by 2030/2031	Document annual activities	
ID-4	Runoff from soil disturbance and impervious area	Develop and enforce an escalating and response procedure to include construction sites, illegal dumping and illegal connections.	The plan will include escalating steps of enforcement	Staff time	Report progress and final to DEQ	Complete by 2030/2031	Document annual activities	
ID-5	Runoff from soil disturbance and impervious area	Annual staff training	Annual training by existing staff. Take advantage of inexpensive regional training	Consultant year 1	Report training date, # of employees in attendance	To occur **each year** starting in 2022/2023	Conduct annual training – develop a schedule. Yr 1 training by consultant	

BMP#	Source *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	Strategy *What will be done to control or reduce pollutant from source?*	How *Specifically, how will this be done?*	Fiscal Considerations *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	Measure *How will successful implementation or completion be measured?*	Timing *When will the strategy be completed?*	Milestone *What intermediate goals will be achieved and by when. Measure success*	Status
ID-6	Runoff from soil disturbance and impervious area	Recordkeeping including response to complaint accounting	Utilize GIS or another database to document response to calls and complaints	Staff time	Report # of complaints and outcome annually	To occur **each year** 2023/2024	Develop a response process and tracking system	
ID-7	Runoff from soil disturbance and impervious area	Complete Stormwater Master Plan	Develop a plan to complete this effort	Staff time	Report annual progress	2026/2027	Develop and follow a plan for progress	
MCM #4 Construction Site Runoff								
CS-1	Runoff from soil disturbance and impervious area	Coordinate with the development community regarding the need for a 1200-C permit provide educational material	Provide materials on the website and conduct site visits	Staff time and consultant	Report progress in yearly report	Ongoing to commence in 2023/2024	Develop a flyer for builders/developers. Use in field and post on website	Brochure has created.
CS-2	Runoff from soil disturbance and impervious area	Develop an Erosion Control Ordinance which includes DEQ requirements and riparian setbacks	Ordinance requires consistency w/ 1200-C.permit. Establish riparian setbacks	Staff time	Document annual progress	2029/2030	Report progress in each annual report	
CS-3	Runoff from soil disturbance and impervious area	Develop and enforce an escalating and response procedure to include qualifying construction sites	The response procedure will be linked to a process that applies to the ID, PC portions of the plan	Staff time	Report progress in annual report	2029/2030	Education will be emphasized prior to ordinance development. Develop draft	

BMP#	Source *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	Strategy *What will be done to control or reduce pollutant from source?*	How *Specifically, how will this be done?*	Fiscal Considerations *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	Measure *How will successful implementation or completion be measured?*	Timing *When will the strategy be completed?*	Milestone *What intermediate goals will be achieved and by when. Measure success*	Status
CS-4	Runoff from soil disturbance and impervious area	Develop a tracking system	Will seek to eventually tie this process to GIS	Staff time	Report progress in annual report	2023/2024	Maintain annual tracking data	
CS-5	Runoff from soil disturbance and impervious area	Annual training for PW person	Develop resource guide	Consultant	Report training and dates	Ongoing annually	Hold training and complete resource manual	
MCM #5 Post-Construction Runoff Control for New and Redevelopment								
PC-1	Runoff from soil disturbance and impervious area	Develop an ordinance or other regulatory mechanism such as design standards to meet the post-construction requirements	Utilize DEQ resources and mirror what other municipalities have done.	Staff time – potential for engineering costs	Document progress annually	Complete by 2031/2032	Describe progress in the annual report	
PC-2	Runoff from soil disturbance and impervious area	Develop inspection and maintenance requirements for publically owned property	The plan should include a checklist for inspections	Staff time	Report annual progress	2032/2033	Add maintenance plan and protocol to GH manual	
PC-3	Runoff from soil disturbance and impervious area	Identify a location suitable for an LID project for stormwater from ROW	Field survey potential sites and install a PC feature	Small budge	Report annual progress	2026/2027	Locate site and design to take runoff from impervious surface. Use proper soil medium and plants	
PC-4	Runoff from soil disturbance and impervious area	Staff training	Annual staff training for involved personnel	Consultant Year 1	Report annual training activities	Ongoing starting in 2022/2023	Consultant to facilitate Year 1 training	

BMP#	**Source** *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	**Strategy** *What will be done to control or reduce pollutant from source?*	**How** *Specifically, how will this be done?*	**Fiscal Considerations** *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	**Measure** *How will successful implementation or completion be measured?*	**Timing** *When will the strategy be completed?*	**Milestone** *What intermediate goals will be achieved and by when. Measure success*	**Status**
MCM #6 Good Housekeeping in Municipal Operations								
GH-1	Pollution from municipal operations	Develop a Good Housekeeping Manual	The manual is a reference guide for operations personnel	Staff time w/ Consultant	Describe progress in the annual report	Complete by 2025/2026	Complete manual	
GH-2	Pollution from municipal operations	Monthly Inspections at Shop Facility	Inspections will occur according to Good Housekeeping Manual in Yr 2	Staff time	Provide completion date and documentation for inspections to DEQ	Conduct inspections starting in 2023/2024	Conduct inspections according to the manual	
GH-3	Pollution from municipal operations	Street Sweeping	Continue street sweeping activities	Staff time	Provide annual activities in annual report	To occur **each year** starting in 2023	Evaluate practices to improve effort. Record quarterly removal totals	Street sweeping is being conducted
GH-4	Pollution from municipal operations	Catchbasin Cleaning	Develop a catchbasin cleaning program	Staff time	Evaluate practices to improve effort	To occur **each year** starting in 2023	Provide annual activities in annual report	
GH-5	Pollution from municipal operations	Annual training	Use resource materials or attend another event	Consultant	Record date, content, and employees	To occur **each year** starting in 2023	Describe progress in the annual report	

BMP#	Source *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	Strategy *What will be done to control or reduce pollutant from source?*	How *Specifically, how will this be done?*	Fiscal Considerations *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	Measure *How will successful implementation or completion be measured?*	Timing *When will the strategy be completed?*	Milestone *What intermediate goals will be achieved and by when. Measure success*	Status
POLLUTANT: Temperature								
MCM #1 Public Education								
PE-1	Sediment loading and lack of shade	Post relevant PE materials to the City's website and other distribution methods	Utilize material from portfolio to make FAQ sheets, brochures, etc	Staff and consultant	Document materials and topics covered annually and discuss in annual report	Ongoing annually	Completion of multiple documents	Completed
PE-3	Sediment loading and lack of shade	Participate in local annual event	Host a booth or event and document materials	Set aside small fund for promotional items	Document date of events and participation	Ongoing annually	Report number of materials handed out, date, and participation	
PE-4	Sediment loading and lack of shade	Tree City USA	Re-establish this activity. Arbor Day Celebration, outreach material.	Staff time and budgeting	Discuss event an educational material in annual report	Ongoing annually	Advertize the event, develop education material.	
PE-5	Sediment loading and lack of shade	Partner with local watershed council, SWCD, university, etc	Attend meetings, network, partner	Staff time and consultant	Report annual progress in yearly report	Ongoing annually	Document progress annually	
MCM #2 Public Involvement								
PI-1	Sediment loading and lack of shade	Maintain a website to post the most current environmental educational information	Post the TMDL Plan on the City website with educational material	Staff time	Post the plan in 2022 and post plan reports submitted to DEQ annually	To occur **each year** starting in 2022	Post new and updated material annually and report	Completed

BMP#	**Source** *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	**Strategy** *What will be done to control or reduce pollutant from source?*	**How** *Specifically, how will this be done?*	**Fiscal Considerations** *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	**Measure** *How will successful implementation or completion be measured?*	**Timing** *When will the strategy be completed?*	**Milestone** *What intermediate goals will be achieved and by when. Measure success*	**Status**
PI-2	Sediment loading and lack of shade	Annual presentation to City Council	Work Session presentation	Consultant and staff	Report progress in yearly report	To occur each year starting in 2022/2023	Content and date to be included in annual report	
MCM #3 Illicit Discharge Detection and Elimination								
ID-2	Sediment loading and lack of shade	Develop an ordinance that prohibits non-stormwater discharges into the stormwater system	Utilize ordinances and programs from other agencies	Staff time involving legal	Provide DEQ annual progress on this BMP in the annual report	Complete by 2030/2031	Document annual activities. Use Phase II as guidance	
ID-3	Sediment loading and lack of shade	Develop and enforce an escalating and response procedure to include construction sites, illegal dumping and illegal connections.	The plan will include escalating steps of enforcement	Staff time	Report progress and final to DEQ	Complete by 2030/2031	Document annual activities	
ID-5	Sediment loading and lack of shade	Annual staff training	Annual training by existing staff. Take advantage of inexpensive regional training	Consultant in Year 1	Report training date, # of employees in attendance	To occur **each year** starting in 2022/2023	Conduct annual training – develop a schedule. Yr 1 training by consultant	
MCM #4 Construction Site Runoff								
CS-2	Sediment loading and lack of shade	Develop an Erosion Control Ordinance which includes DEQ requirements and riparian setbacks	Ordinance and document need to be consistent with the 1200-C permit	Staff time	Document annual progress	2029/2030	Report progress in each annual report	

BMP#	Source *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	Strategy *What will be done to control or reduce pollutant from source?*	How *Specifically, how will this be done?*	Fiscal Considerations *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	Measure *How will successful implementation or completion be measured?*	Timing *When will the strategy be completed?*	Milestone *What intermediate goals will be achieved and by when. Measure success*	Status
CS-3	Sediment loading and lack of shade	Develop and enforce an escalating and response procedure to include qualifying construction sites	The response procedure will be linked to a process that applies to the ID, PC portions of the plan	Staff time	Report progress in annual report	2029/2030	Education will be emphasized prior to ordinance development. Develop draft	
CS-5	Sediment loading and lack of shade	Annual training for PW person	Develop resource guide	Consultant	Report training and dates	Ongoing annually	Hold training and complete resource manual	
MCM #5 Post Construction Runoff Control in New and Redevelopment								
PC-1	Sediment loading and lack of shade	Develop an ordinance or other mechanism such as design standards to meet the post-construction reqs.	Utilize DEQ resources and mirror what other municipalities have done.	Staff time – potential for engineering costs	Document progress annually	Complete by 2031/2032	Describe progress in the annual report	
PC-2	Runoff from soil disturbance and impervious area	Develop inspection and maintenance requirements for publically owned property	The plan should include a checklist for inspections	Staff time	Report annual progress	2032/2033	Add maintenance plan and protocol to GH manual	
PC-3	Runoff from soil disturbance and impervious area	Identify a location suitable for an LID project for stormwater from ROW	Field survey potential sites and install a PC feature	Small budget	Report annual progress	2026/2027	Locate site and design to take runoff from impervious surface. Use proper soil medium and plants	
PC-4	Sediment loading and lack of shade	Staff training	Annual staff training	Consultant in Year 1	Report annual activities	Ongoing starting in 2022/2023	Consultant to facilitate Year 1 training	

BMP#	Source *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	Strategy *What will be done to control or reduce pollutant from source?*	How *Specifically, how will this be done?*	Fiscal Considerations *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	Measure *How will successful implementation or completion be measured?*	Timing *When will the strategy be completed?*	Milestone *What intermediate goals will be achieved and by when. Measure success*	Status
MCM #6 Good Housekeeping in Municipal Operations								
GH-1	Pollution from municipal operations	Develop a Good Housekeeping Manual	Include protocol for retention of trees and native vegetation along waterways	Staff time w/ Consultant	Complete manual	Complete by 2022/2023	Describe progress in the annual report	
CS-5	Pollution from municipal operations	Annual training for PW person	Develop resource guide	Consultant	Report training and dates	Ongoing annually	Hold training and complete resource manual	
POLLUTANT: Bacteria								
MCM # 1 Public Education								
PE-1	Runoff from pervious surface or degraded riparian area	Post relevant PE materials to the City's website and other distribution methods	Utilize material from portfolio to make FAQ sheets, brochures, etc	Staff	Document materials and topics covered annually and discuss in annual report	Ongoing annually	Completion of multiple documents on the website for the public to access. Update routinely	Completed
PE-2	Runoff from pervious surface or degraded riparian area	SOLV Community River Clean up	City Staff and volunteers partner with SOLV	Staff time	Document event, date, number of participants and discuss in annual report	Ongoing annually	Advertise for event and record events	
PE-3	Runoff from pervious surface or degraded riparian area	Participate in local annual event	Host a booth or event and document materials	Set aside small fund for promotional items	Document date of events and participation	Ongoing annually	Report number of materials handed out, date, and participation	

BMP#	Source *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	Strategy *What will be done to control or reduce pollutant from source?*	How *Specifically, how will this be done?*	Fiscal Considerations *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	Measure *How will successful implementation or completion be measured?*	Timing *When will the strategy be completed?*	Milestone *What intermediate goals will be achieved and by when. Measure success*	Status
PE-7	Runoff from pervious surface, or illegal discharge	Maintain pet waste stations	Maintain and stock stations	Funding for bags	Document in annual report	Ongoing annually	Record # of bags and maintenance activities	
PE-8	Runoff from pervious surface, or illegal discharge	Provide outreach and education materials to hobby farms and septic system owners	Collect property owner information and send direct mailing	Postage	Report # of mailings in annual report	2x during permit term	Send mailing in 2024 and in 2026	
MCM #2 Public Involvement and Participation								
PI-1	Runoff from pervious surface or degraded riparian area	Maintain a website to post the most current environmental educational information	Post the TMDL Imp Plan and other educational information	Staff time	Post new and updated material annually and report	To occur **each year** starting in 2022	Post the plan in 2022 and post plan reports submitted to DEQ annually	Completed
PI-2	Runoff from pervious surface or degraded riparian area	Annual presentation to City Council	Work Session presentation	Consultant and staff	Report progress in yearly report	To occur each year starting in 2022/2023	Content and date to be included in annual report	
ID-2	Runoff from soil disturbance and impervious area	Develop an inventory of stormwater assets and facilities	Field verify stormwater system to collect and locate assets and facilities	Staff time	Report progress in annual report	Ongoing annually	Collect information annually and keep records of locations, type, function, condition	

BMP#	Source *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	Strategy *What will be done to control or reduce pollutant from source?*	How *Specifically, how will this be done?*	Fiscal Considerations *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	Measure *How will successful implementation or completion be measured?*	Timing *When will the strategy be completed?*	Milestone *What intermediate goals will be achieved and by when. Measure success*	Status
ID-3	Runoff from soil disturbance and impervious area	Develop an ordinance that prohibits non-stormwater discharges	Develop a plan to meet the conditions of IDDE in 2022/2023	Staff time involving legal	Document annual progress	Complete by 2030/2031	Provide DEQ annual progress on this BMP in the annual report	
ID-4	Runoff from soil disturbance and impervious area	Develop an enforcement response plan	The plan will include escalating steps of enforcement	Staff time	Report progress and final to DEQ	Complete by 2030/2031	Document annual activities	
ID-5	Runoff from soil disturbance and impervious area	Annual staff training	Annual training by existing staff. Take advantage of inexpensive regional training	Consultant in Year 1	Report training date, # of employees in attendance	To occur **each year** starting in 2022/2023	Conduct annual training – develop a schedule. Yr 1 training by consultant	
MCM #4 Construction Site Runoff								
CS-2	Runoff from soil disturbance and impervious area	Develop an Erosion Control Ordinance which includes DEQ requirements	Ordinance and document need to be consistent with 1200-C and/or 1200-CN programs	Staff time	Document annual progress	2029/2030	Report progress in each annual report	
CS-3	Runoff from soil disturbance and impervious area	Develop and enforce an escalating and response procedure to include qualifying construction sites	The response procedure will be linked to a process that applies to the ID, PC portions of the plan	Staff time	Report progress in annual report	2029/2030	Education will be emphasized prior to ordinance development. Develop draft	

BMP#	Source *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	Strategy *What will be done to control or reduce pollutant from source?*	How *Specifically, how will this be done?*	Fiscal Considerations *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	Measure *How will successful implementation or completion be measured?*	Timing *When will the strategy be completed?*	Milestone *What intermediate goals will be achieved and by when. Measure success*	Status
MCM #5 Post Construction Runoff Control in New and Redevelopment								
PC-1	Runoff from soil disturbance and impervious area	Develop an ordinance or other regulatory mechanism such as design standards	Utilize DEQ resources and mirror what other municipalities have done.	Staff time – potential for engineering costs	Describe progress in the annual report	Complete by 2031/2032	Document progress annually	
PC-2	Runoff from soil disturbance and impervious area	Develop inspection and maintenance requirements for publically owned property	The plan should include a checklist for inspections	Staff time	Report annual progress	2032/2033	Add maintenance plan and protocol to GH manual	
PC-3	Runoff from soil disturbance and impervious area	Identify a location suitable for an LID project for stormwater from ROW	Field survey potential sites and install a PC feature	Small budget for materials	Report annual progress	2026/2027	Locate site and design to take runoff from impervious surface. Use proper soil medium and plants	
PC-4	Runoff from soil disturbance and impervious area	Staff training	Annual staff training	Cost of training	Report annual training activities	Ongoing starting in 2022/2023	Consultant to facilitate Year 1 training	
MCM #6 Good Housekeeping in Municipal Operations								
GH-1	Pollution from municipal operations	Develop a Good Housekeeping Manual	Include protocol for retention of trees and native vegetation along waterways	Staff time w/ Consultant	Describe progress in the annual report	Complete by 2023/2024	Complete manual and track activities	
GH-3	Pollution from municipal operations	Street Sweeping	Continue street sweeping activities	Staff time	Provide annual activities in annual report	To occur **each year** starting in 2023	Evaluate practices to improve effort. Record quarterly removal totals	

BMP#	**Source** *What source is being addressed? (ex. runoff from construction sites, riparian condition)*	**Strategy** *What will be done to control or reduce pollutant from source?*	**How** *Specifically, how will this be done?*	**Fiscal Considerations** *How is the BMP funded? (ex. In the 2023 budget, grant, etc.)*	**Measure** *How will successful implementation or completion be measured?*	**Timing** *When will the strategy be completed?*	**Milestone** *What intermediate goals will be achieved and by when. Measure success*	**Status**
GH-4	Pollution from municipal operations	Catchbasin Cleaning	Develop a catchbasin cleaning program	Staff time	Evaluate practices to improve effort	To occur **each year** starting in 2023	Provide annual activities in annual report	
GH-5	Pollution from municipal operations	Annual training	Use resource materials or attend another event	Consultant	Record date, content, and employees	To occur **each year** starting in 2023	Describe progress in the annual report	
Other Management Activities								
		Develop a sustainable stormwater fee	Review possible options including an impervious surface study	Staff time	Annual progress shall include options considered, and next steps	2025/2026	Provide annual activities in annual report	
		Complete annual reports	Develop document based on recordkeeping	Consultant	Complete and submit the annual report	By due date annually		
		Evaluate public education activities according to WQMP	Choose 1 activity to promote and help lead other activities	Consultant	Review activities with staff and determine most effective activity and why	To be submitted with annual report		

		Annually evaluate implementation efforts and program progress	Review and evaluative actions (monitoring)	Consultant	Review and discuss with staff to plan changes for following year	To be submitted with annual report		
		Complete 5th Year Assessment and Evaluation	Gather information based on recordkeeping and annual reports	Staff time	Complete assessment using DEQ guidelines	2026/2027		

	Control Measures
PE	Public Education
PI	Public Involvement and Participation
ID	Illicit Discharge Detection and Elimination
CS	Construction Site Runoff Control
PC	Post-Construction Runoff Control
GH	Good Housekeeping in Municipal Operations