CITY OF INDEPENDENCE 2018 TMDL IMPLEMENTATION PLAN UPDATE

DATE

In the process of updating the City of Independence 2013 Willamette TMDL Implementation Plan the City's Public Works Director noticed a trend of incomplete implementation of the 2013 plan due to the absence of a specific fund category and source identified in the City's budget for implementation of the Program. In order to realistically be able to fund the activities that the City is committing to complete during the next implementation cycle, it is his intent to create a funding category in the City's 2019-2020 budget for this purpose. As such, many of the actions identified are dependent upon budgeting and funding approvals. During the FY 2018-2019 budget year the task items identified for completion during the 2018- 2019 FY will be completed using funds budgeted for the department's general operations.

This document results from review and update of the City's March 2013 TMDL Implementation Plan. This update identifies changes to the 2013 plan on a section by section basis. Some of the sections remain unchanged and therefore are not addressed in this 5-yr update of the plan, but, are retained in the matrix. Since sediment erosion is a common element for both bacteria and mercury, those two sections of the 2013 matrix have been combined for the 2018 matrix. The 2018 matrix contains a total of 22 action items where the 2013 matrix contained 24 action items

Section 3.2 Gaps

Table 1 - Pollutant Reduction Focus Areas for the City of Independence

Strategy Category	Priority Rating
ADD	
Low Impact Development	Medium

Low impact development provisions were identified as a potentially beneficial strategy in a study titled "Low-Impact Development (LID): Findings & Recommendations for the Ash Creek Watershed, Polk County, OR" Dated October

2017. Although there were no specific immediately implementable recommendations in the report, the City of Independence intends to evaluate the recommendations contained in the report in terms of incorporating LID features that reduce sediment release, into City development practices. Refer to Task 21 of the TMDL matrix.

SECTION 4 COMPONENTS OF IMPLEMENTATION PLAN UPDATE

The City's 2013 TMDL Implementation Plan identified 24 water quality protection actions to reduce contributions of heat, bacteria, and mercury. As part of this update, the City has reorganized the original 24 water quality protection action items and proposed new action items into 22 tasks in the 2018 TMDL matrix to be completed in the next 5-yr plan cycle.

Section 4.1 Riparian Protection and Restoration

The following six tasks are related to riparian protection and restoration (Tasks 1-6). During the next 5-yr TMDL Implementation Cycle the City and (Luckiamute Watershed Council) (conditioned upon funding approval) will undertake the actions described below related to riparian protection and restoration.

1. The City will evaluate and if appropriate will establish and apply riparian protection and enhancement measures to named and no-name perennial streams tributary to ash creek. This will require an amendment of Subchapter 15 of the Development Code. Task 1 has been modified to address efforts to extend the 25' setback requirement to named and unnamed Ash Creek tributaries.
2. The City will continue efforts to increase riparian shading through support of tree planting projects as identified in Tasks 2 and 3 of the matrix.
3. The Ash Creek Trail Project is being constructed in segments as funding becomes available. The primary focus has been on constructing the trail surface. In the future, greater emphasis will be placed on incorporating riparian shading into the project. This will require incorporation of features to prevent root damage to the trail surface. Refer to Task 4 in the TMDL matrix.

4. The City will renew efforts to cooperate with the LWC in order to complete riparian restoration projects. Task 5 of the TMDL matrix reflects this effort.
5. The City will explore the potential benefits of providing monetary support for staffing of the LWC with focus on riparian enhancement and tree planting projects. Task 6 of the TMDL matrix reflects this effort.
6. The City will explore the potential benefits of providing monetary support to the Polk County Master Gardeners' Inspiration Garden at Mountain Fir Park Project. The project is providing riparian restoration at a former lumber mill site. Task 22 of the TMDL matrix address' this effort.

Section 4.2   Wastewater Treatment

The City is in the planning and design process for water reuse facilities in coordination with DEQ permitting staff. The reuse facilities will include reuse water treatment, pumping and irrigation distribution on farm land. Tasks 19 and 20 of the TMDL matrix reflect this effort.

Section 4.3   Stormwater Planning, Management

1. The City has an existing Stormwater Management Plan (SWMP) that needs updating in some areas. Updating of a SWMP is typically driven by a specific need and/or when grants or other funding sources become available. The current need does not justify the expenditure of limited City funds at this time. As such Task 11 of the TMDL Matrix reflect the City's efforts to produce a comprehensive map of its storm water system in leu of updating its SWMP.
2. The City will continue efforts to reduce the quantity and improve the quality of stormwater runoff from new development through construction control and monitoring during construction and the incorporation of storm water infiltration mechanisms where practical. Although there is currently no mandate for developers to propose or provide storm water infiltration, The City will review and if appropriate, approve infiltration mechanisms and other water quality control devices that are proposed. Tasks 9 and 10 of the TMDL Matrix reflect the City's revised approach to new development.

Section 4.4   Erosion Control

1. The City will continue efforts to reduce erosion of soil, that may contain naturally occurring background levels of mercury and/or mercury from air deposition, into storm water. Tasks13 and 14 of the TMDL Matrix address erosion of native soil that may contain bacteria and mercury.
2. The City intends to implement a Grading Permit Program (GPP), that includes references to construction BMPs, for construction projects involving soil disturbances greater than 10,000 square feet or 50 cubic yards of excavation. Task 13 of the TMDL matrix has been modified to reflect the City's strategy to develop a GPP in lieu of amending the City code to include construction BMPs.
3. The City will continue its leaf collection program in an effort to reducing the quantity of bacteria and mercury containing debris from entering and potentially plugging the stormwater system. Task 18 of the TMDL matrix addresses this effort.

Section 4.5   Animal Waste Management

1. The City has maintained its pet waste management programs through the establishment of dog parks and installation of pet waste bag dispensers at parks and other locations frequented by pet owners and their pets. Task 7 of the TMDL Matrix reflects the continued effort in this regard.
2. The City will undertake efforts to educate the public about bacteria releases associated with domestic pet housing (kennels etc.) and livestock raising facilities (such as chicken or rabbit pens). Task 8 of the TMDL Matrix address' this effort.

Section 4.6   Education/Training

1. The City will continue its efforts to educate the public through the City's Website, distribution of educational materials, City Department open houses and working with schools with the storm drain marker program. Information about the County's Household Hazardous Waste Collection program will be included in the education events discussed above. The City will continue its cooperative program with Ash Creek Water Control District to help control littering along Ash Creek. Tasks 12, 15 and 16 of the TMDL Matrix address these efforts.

2. In the future the City will depend upon the Polk County household hazardous waste collection events to address household hazardous waste issues. Task 16 of the TMDL Matrix address' this effort.
3. The City will also conduct in house training and send staff to outside training opportunities related to illicit discharge detection, storm drain cleaning, and detection of excessive sediment discharges by inspecting suspect properties and observing storm drain conditions during storm events. Task 17 of the TMDL Matrix address' this effort.

Section 4.7   Illicit Discharge

Illicit discharges to the storm water system will be addressed through the items described under Section 4.6 Education/Training above.

Section 4.8 Low Impact Development

The City is adding a task for Low Impact Development (LID) to its TMDL Implementation Plan during this 5-year plan update. This is a recommendation from the Ash Creek Study and the Statewide Goal 5 process. LID offers the potential to reduce some of the adverse effects that land development can have on storm water. LID techniques can reduce the quantity of storm water discharge from development through techniques that reduce the quantity of runoff generated, infiltrate runoff for recharge of ground water and increased sub surface flow to surface waters. LID can also incorporate techniques that treat storm water to reduce and remove sediment, oil and grease, and other potential contaminants that impact water quality.

The City will encourage, incentivize and facilitate proposed LID in its development review and approval process. Task 21 of the TMDL Matrix address' this effort.

Funding Considerations

The above plan represents a comprehensive effort to implement an optimum program to limit adverse impacts to surface waters that could result from the City's storm water system. Full implementation of the 2018 TMDL Plan will require expenditure by the City of an estimated $50,000 to upgrade its Storm Water System Maps and an estimated $33,500 annual expenditure to operate the City's TMDL Program. Approximately 25 percent of this amount is currently

budgeted. Approval of additional funding will determine the extent to which the plan will be fully implemented.