



CITY OF KEIZER | Public Works Department

930 Chemawa Rd NE, Keizer OR 97303

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December 27, 2019

Nancy Gramlich
TMDL Basin Coordinator
DEQ Salem Office, Western Region
4026 Fairview Industrial Drive SE
Salem, OR 97302

Dear Ms. Gramlich:

The City of Keizer is pleased to submit the TMDL Annual Report for permit year 2018-2019. We sincerely appreciate DEQs willingness to extend the due date on this report to December 31, 2018.

As you review this report please keep in mind that the Environmental & Technical Division had significant turnover of key staff during the reporting period that affected progress in some areas. Despite this, critical components of TMDL implementation were executed successfully.

In previous years, this annual report was integrated and submitted along with the City's NPDES MS4 Phase II annual report. However, DEQ issued the NPDES MS4 Phase II General Permit on November 30, 2018; Keizer's permit became effective in March of 2019. Per those requirements, the City was not required to submit an annual report for the 2018-19 reporting period. Therefore, this report contains only the content pertinent to the 2018 TMDL Implementation Plan.

Furthermore, with the issuance of the new General Permit, staff has been evaluating, planning, and implementing best management practices (BMPs) to meet the new requirements. Because many of those BMPs also satisfy the requirements of the City's TMDL Implementation Plan, our staff will work closely with you to ensure that our efforts meet DEQs expectations.

Finally, this annual report will be posted to the City's website as described in the plan.

If you have questions or concerns, I can be reached at (503) 856-3526 or via email at the address listed below.

Sincerely:

Keare Blaylock
Interim Environmental & Technical Division Manager
503-856-3526
blaylockk@keizer.org

Cc: Bill Lawyer, City of Keizer Public Works Director

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930 Chemawa Rd NE, Keizer OR 97303



2018-19 TMDL Implementation Plan Annual Report

Prepared by the Environmental & Technical Division on behalf of the City of Keizer Public Works Department.

3rd Implementation Term

December 2019



2018-19 TMDL Implementation Plan Annual Report

TMDL Basin:	Middle Willamette
Receiving Sub-basins:	Willamette River, Labish Ditch, Claggett Creek
Population:	39,692 (2019 Estimate, US Census Bureau)
Water Quality Permits:	NPDES Phase II #102904, WPCF Class V #103608

Background

The City of Keizer submitted their TMDL Implementation Plan to DEQ in April 2008. Since that time, the City has submitted all of the required annual reports and five year reviews and updated the Implementation Plan accordingly.

Following the completion of the last 5th Year Review for designated management agencies (DMA), the City of Keizer updated its TMDL Implementation Plan and submitted it to DEQ in 2018. No reporting was required during the 5th report year, 2017-18. This document and the attached matrix serve as the 2018-19 annual report.

Introduction

The updated TMDL Implementation Plan submitted in 2018 was developed with an eye on the potential programmatic changes that would come about with the issuance of the Phase II General Permit. The General Permit had not been issued to the Phase II agencies on completion of the 2018 Implementation Plan, but City staff had been closely involved with the renewal process since the inception of the MS4 Advisory Committee. Given that the Implementation Plan and the Phase II permit are closely linked, staff was well suited to make assumptions on the direction of the Phase II permit and those are included in the 2018 Implementation Plan.

Progress

The City's water quality programs were officially introduced in 2007 and 2008 with the issuance of the MS4 Individual Permit and TMDL Implementation Plan. Since that time the City has continued to develop programs, implement BMPs, refine practices, and adhere to regulatory regulations. A full accounting of yearly progress is reported in the TMDL Implementation Plan Matrix under the "Status" column. Some highlights of the 2018-2019 report year are provided below:

- Hosted the annual Water Festival
- Hosted the annual Erosion Control and Stormwater Management Summit
- Used the annual Consumer Confidence Report to provide educational information to the community
- Continued regular meetings with the Stormwater Advisory Committee
- Continued implementation of the Erosion Control Program



- Distributed the Stormwater Newsletter to elected officials, staff and the public
- Continued to partner with the Mid-Willamette Outreach Group
- Continued to partner with the Clean Rivers Coalition
- Began development of the Stormwater Management Program document (SWMP.doc) required in the new General Permit
- Completed a draft Public Education Plan that addresses target audiences and key messages described in the General Permit as well as the TMDL pollutants of concern.

Limitations

The City's Environmental & Technical Division suffered significant staffing issues in 2018-2019 that resulted in a reduction of productivity and some activities had to be postponed. While implementation of core programs have continued, the City anticipates a rebound in activity in the 2019-20 reporting period.

Status Report

TMDL Implementation Plan Matrix

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TMDL Implementation Plan – Status Report

3rd Implementation Term – 2018-2019

Pollutant: Bacteria								
Minimum Control Measure	Source <i>What source of this pollutant is being addressed?</i>	Strategy <i>What is being done, or what will be done to reduce or control pollution from the source?</i>	BMP	Fiscal Analysis	Measure <i>How will successful implementation or completion of this strategy be measured?</i>	Milestone <i>What goals will be achieved and when? What progress is being made?</i>	Timeline <i>When will the strategy be completed?</i>	Status
Public Education	1. Bacteria carried to waterways in storm runoff and piped system	a. Prevent domestic animal waste from reaching waterway	i. Partner with an existing local activity such as Walk and Wag to promote pet waste education	Minor cost for SWAG and brochures	Attendance at one annual event	Attendance at event	2019 - 2023	Provided bandanas for Capital Canine Club pledgees at the annual Walk and Wag event. (The Capital Canine Club distributed 52 bandanas to new club members.)
Public Education			ii. Continue to stock pet waste stations and supply bags at City parks	Variable	Communicate with Parks staff to determine if stations are being served and installed	Summary from Parks staff	Annual activity	The city has 14 Pet-Waste Stations throughout the park system; stations are checked/refilled on a monthly basis. Stations at the Keizer Rapids Dog Park are checked at least twice a month.
Public Education			iii. Continue guided hikes by Stormwater staff to highlight environmental issues of concern along waterways.	Funded	Track number of participants, school groups, and events	Work with local teachers and partner with other agencies for participation.	Annual activity	September 2018, Environmental staff hosted the 4 th -grade classes from Keizer Elementary at Keizer Rapids Park for an outdoor education event that included a guided nature hike through a riparian area, a watershed model demonstration, a vacuum truck demonstration, and a wildlife adaptation station.
Public Education			iv. Add stormwater-related information to the City's Website	Funded	Track information added or updated	Review annual updates	Annual activity	Information on sources and impacts of bacteria on waterways was added to the City Website.
Public Education		a. Public outreach covering bacteria issues and concerns	i. Annual Water Festival	Co-funded by MWOG agencies	Track events, activities and participation	Annual planning meeting for the event	Annual activity	April 30, 2019, Keizer hosted 90+ fifth-grade students from Hallman Elementary School in partnership with MWOG. Students rotated through eight activity stations designed to increase watershed awareness, to highlight the sources and impacts of stormwater pollution, and to demonstrate the effects of temperature on water quality/salmon biology.
Public Education			ii. Quarterly Newsletter and direct outreach to the media	Funded	An Environmental Newsletter is currently prepared for internal distribution. Take advantage of local media outlets for additional coverage.	Track newsletter, printings, topic, and distribution	Annual activity	Newsletters were distributed in September 2018 and December 2018. Spring and summer issues were postponed due to staffing issues.
Public Involvement			i. Public Review of TMDL Implementation Plan	Staff time	Document events		Annual activity	The City's TMDL Plan and Annual Report(s) were made available to the public for review and comment; no comments were received.
Illicit Discharge		a. Prevent human waste (from cross-connections), oil, grease, paint, and other pollutants from entering the storm system.	i. Revise Illicit Discharge Detection and Elimination Plan to meet the conditions of the new Phase II permit	Funded	Completion of revised plan	Annually report on progress	To be completed in coordination with the permit timing requirements	This work has not been completed yet. Revision of the ordinance has been added to the MS4 SWMP.doc as a BMP. This BMP must be completed by Feb. 28, 2022.



Illicit Discharge			ii. Internal training for implementation of the new plan	Staff time	Track training	Annually report on progress	Initiate training when document is complete. Training to occur annually	This work is scheduled to be completed no later than Feb. 28, 2022
Illicit Discharge			iii. Annual TV inspection of the MS4	Funded	Track annual footage and identify illegal connections and repairs	Percentage and/or footage shall be consistent with the new Phase II permit	Activity as required by the new Phase II permit	This activity is ongoing. 41,926 feet or 12% of the MS4 was TV inspected and 31 dump truck loads of debris were removed from the storm system during the reporting period.
Enforcement Response			iv. Implement Enforcement Plan according to the specifications of the new Phase II permit	Staff time	Tracking and recordkeeping	Provide annual statistics according to permit	Annual activity	The enforcement plan required in the new General Permit has not yet been developed. It must be completed no later than Feb. 28, 2022.

Six Minimum Control Measures

PE = Public Education

PI = Public Involvement/Participation

ID = Illicit Discharge Detection and Elimination (IDDE)

CS = Construction Site Runoff Control

DS = Development Standards (Post-Construction Runoff Control)

OM = Operations and Maintenance (Pollution Prevention/Good Housekeeping)



TMDL Implementation Plan – Status Report

3rd Implementation Term – 2018-2019

Pollutant: Mercury								
Minimum Control Measure	Source <i>What source of this pollutant is being addressed?</i>	Strategy <i>What is being done, or what will be done to reduce or control pollution from the source?</i>	BMP	Fiscal Analysis	Measure <i>How will successful implementation or completion of this strategy be measured?</i>	Milestone <i>What goals will be achieved and when? What progress is being made?</i>	Timeline <i>When will the strategy be completed?</i>	Status
Public Education		a. Public Education	i. Add stormwater-related information to the City's Website	Funded	Track information added or updated	Review annual updates	Annual activity	Information on sources and impacts of mercury on waterways was added to the City Website.
Public Education			ii. Erosion Control Summit	Funded	Track attendees and information presented	Planning meetings with MWOG agencies	Annual activity	January 29, 2019, the Summit was hosted by Keizer in partnership with MWOG. Approximately 115 attendees were presented information and training on water policy and permitting, erosion control BMPs, slope stabilization, pervious pavement, and construction erosion case studies.
Public Education			ii. Post Erosion Control presentations to the website	Funded		Review when material is posted	Annual activity	Presentations from the 2019 Erosion Control Summit were posted to the City's website following the event.
Public Education			iii. Utilize the annual Consumer Confidence Report (CCR) to provide citywide outreach	Funded	Track content	Mailings scheduled for April/May on an annual basis.	Annual activity	The mailing was sent out in March 2019 and was delivered to all businesses and residents in the City of Keizer.
Public Education			iv. Quarterly Newsletter and direct outreach to the media	Funded	An Environmental Newsletter is currently prepared for internal distribution. Take advantage of local media outlets for additional coverage.	Track newsletter, printings, topic, and distribution	Annual activity	Newsletters were distributed in September 2018 and December 2018. Spring and summer issues were postponed due to staffing issues.
Construction Site		c. Keep soil on site. Prevent material from entering catch basins and waterways	i. Internal training for field staff	Staff time	Record of meeting and content	Training schedule to be developed by staff	Annual activity	Two Environmental Program Technicians received CESCL Certification in June 2019; three additional staff members in Public Works also maintain CESCL certification. Eight Public Works employees attended the 2019 Erosion Control Summit.
Construction Site			ii. Conduct site inspections prior to soil disturbance	Staff time	Track meetings		Annual activity	34 erosion control permits were issued in 2018/2019. At a minimum, sites are inspected upon BMPs installation, 1x per week while the permit is open, after rain events, and when the project is closing.
Development Standards			i. Develop a Water Quality Manual and associated standards	Staff time	City Council adoption of revised documents	Staff anticipates utilizing SWAC for review of this activity	To be completed in conjunction with the timeline listed in the Phase II permit	No progress has occurred on this BMP. The City is still requiring onsite infiltration for all new development projects. This work is scheduled to be completed no later than February 28, 2023.
Development Standards			ii. Internal training for water quality facilities	Staff time	Completion of training	Develop training schedule	Annual activity	No progress has occurred on this BMP. The City will develop and implement training in conjunction with the General Permit programmatic.
Operations and Maintenance			i. Revise the Good Housekeeping Manual	Staff time	Track progress		In conjunction with Phase II requirements	No progress has occurred on this BMP. Staff to complete updates of the Good Housekeeping no later than February 28, 2022.



Operations and Maintenance			ii. Internal training for O & M practices	Staff time	Track meetings	Ongoing	Annual activity	Training was provided on 11/27/2018, 01/08/2019, 01/09/2019, 01/30/2019, and 06/20/2019. The City will update and implement further training in conjunction with the General Permit programmatic.
Operations and Maintenance			iii. Catch basin cleaning	Funded		Annual inspect all catch basins and clean those with 6" or more of debris.	Ongoing	This activity was completed (2,323 catch basins were inspected; 270 were cleaned. 363 manholes were inspected; 17 were cleaned. 6 catch basins were repaired and 27 yards of material was removed from the system.
Operations and Maintenance			iv. Conduct street sweeping	Funded	Track progress	Sweeping on a monthly basis. This program is currently underway.	Ongoing	This activity was completed. Regular sweeping services are contracted through July 31, 2021.
Enforcement Response			i. Develop Enforcement Response Plan	Staff time	Track implementation statistics		To be developed in conjunction with new permit requirements	No progress has occurred on this BMP; the existing Enforcement Response Plan is still in use. Staff will complete updates to the plan as soon as possible, no later than February 28, 2022.

Six Minimum Control Measures

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TMDL Implementation Plan – Status Report

3rd Implementation Term – 2018-2019

Pollutant: Temperature								
Minimum Control Measure	Source <i>What source of this pollutant is being addressed?</i>	Strategy <i>What is being done, or what will be done to reduce or control pollution from the source?</i>	BMP	Fiscal Analysis	Measure <i>How will successful implementation or completion of this strategy be measured?</i>	Milestone <i>What goals will be achieved and when? What progress is being made?</i>	Timeline <i>When will the strategy be completed?</i>	Status
Public Education	1. Solar radiation and sediment deposition that results in a change in stream profile.	a. Retain mature trees, native vegetation, and encourage tree planting and use of native species for bank stabilization	i. Utilize the annual Consumer Confidence Report (CCR) to provide citywide outreach	Funded	Track content	Mailings scheduled for April/May on an annual basis.	Annual activity	The mailing was sent out in March 2019 and was delivered to all businesses and residents in the City of Keizer.
Public Education			ii. Develop a 5 year plan for enhancement of the Claggett Creek Park Wetland Complex	Will be seeking grants	Meet goals for each year – document progress	Developed plan and community partners	2023 to 2025	This property has been used as a cow pasture historically. A recent wetland delineation indicates that there are aprx 5 acres of wetland adjacent to Claggett Creek. The goal is to restore this area to a natural state and make it accessible to the public for passive recreation and education. No progress has been made on this activity.
Public Education			iii. Implement condition of the plan for the Claggett Creek Park Wetlands	Staff time. Materials and equipment	Annual progress		Annual activity	No progress has been made on this activity.
Public Education		b. Public outreach covering temperature issues and concerns	i. Guided hikes at Keizer Rapids Park.	Funded	Track number of participants, school groups, and events	Work with local teachers and partner with other agencies for participation.	Annual activity	September 2018, Environmental staff hosted the 4 th -grade classes from Keizer Elementary at Keizer Rapids Park for an outdoor education event that included a guided nature hike through a riparian area, a watershed model demonstration, a vacuum truck demonstration, and a wildlife adaptation station.
Public Education			ii. Use website to provide stormwater education	Funded	Track information added or updated	Review annual updates	Annual activity	Information on sources and impacts of temperature on waterways was added to the City Website.
Public Involvement			i. Utilize volunteer groups for appropriate work at the Claggett Creek Park Wetlands	Staff Time		Include volunteer activities into the plan	Volunteer work will be incorporated according to the overall plan for the site.	No progress has been made on this activity.
Arboretum			i. Utilize the new arboretum for providing information about the benefits of trees in filtering stormwater and providing shade to waterway	Funded	Track activities and groups of visitors	First activity	Annual activity	Staff worked with the Claggett Creek Watershed Council and the Rotary Club to implement the first phase of the arboretum; a variety of native trees were planted at Keizer Rapids Park. Labels were created and placed; irrigation systems were installed. The features were collected and added to the GIS.
Community College			i. Continue to use Cooperative Work Experience interns for tree inventory work in Keizer	Staff time	Track interns and specific activities	Intern goals met	This will occur routinely when the school has an appropriate student for us.	An intern from Chemeketa Community College performed vegetation surveys and maintenance under the supervision of the Parks Division Manager.



Tree Preservation Ordinance			ii. Develop a Tree Preservation Ordinance	Staff Time	Track annual progress	Adoption by City Council	Implementation 2023 / 2024	No progress has been made on this activity.
Update Wetlands Protection in City Code			iii. City code does not adequately address wetlands protection. Update code	Staff Time	Track annual progress	Adoption by City Council	Final 2023 / 2024	No progress has been made on this activity.

Six Minimum Control Measures

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