



Public Works Department

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June 14, 2022

Ms. Priscilla Woolverton
Upper Willamette TMDL Basin Coordinator
Oregon DEQ Western Region
165 E 7th Avenue, Suite 100
Eugene OR 97401

Re: City of Sweet Home – Submitted TMDL Implementation: Annual Report for 2021-2022

Dear Ms. Woolverton,

The City of Sweet Home is pleased to submit our Annual Report for 2022. The City was able to complete some major projects such as the SDC Fee update, stormwater user fee update, and purchase of a new street sweeper.

Should you have any questions, or comments, please contact us at (541) 367-6359.

Sincerely,

Greg Springman
Public Works Director

Cc: Christy Wurster, City Manager Pro Tem

delivered via email



TMDL Implementation Plan 2018-2023: Annual Report for 2021

City of Sweet Home, Linn County, Oregon

Receiving Waters: Ames Creek, Wiley Creek, South Santiam River

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Introduction

The purpose of this report is to update DEQ on progress the City made on the strategies identified in our TMDL Implementation Plan during the May 1, 2021 – April 30, 2022 reporting period. The following pages are taken directly from our TMDL Implementation Plan 2018-2023 with a description of the current status added to each strategy.

The Community & Economic Development Department (CEDD) and the Public Works Department (PW) jointly implement the City’s TMDL strategies. Staff workload capacity continues to be a limiting factor in achieving some of our administrative implementation measures. Despite this, we are pleased to report that we made progress on several major strategies during the reporting period including the Stormwater Master Plan update and the development code update.

Staff capacity has been identified as the limiting factor to implementing many projects since 2018. Staff continues to present these needs to administration and City Council, however the City’s permanent tax rate is extraordinarily low compared to nearly any other jurisdiction, and state law prevents further increases in our permanent rate. City Council is also unwilling to

impose additional financial burden to the residents at this time. This results in an extremely tight General Fund, which severely limits the options available to CEDD. Public Works operations have also suffered from staff turnover and difficulty recruiting candidates in a market favorable to applicants. Sweet Home can't compete with the higher wages offered in neighboring jurisdictions or the private sector, and has had very few applicants for recent openings.

City Council has expressed a willingness to consider a stormwater rate adjustment following completion of the Stormwater Master Plan update and its associated capital improvement recommendations.

1.0 Strategies for reducing Temperature Pollution

“In both urban and rural areas, increased solar radiation can result from removal of riparian (streamside) vegetation which reduces the amount of shade over the water and increases stream temperature.” (source: [Oregon DEQ Pollution Control Tools and Programs](#))

1.1 Temperature Source: Solar radiation input

Strategy: Protect existing riparian vegetation on private properties.
How: Enforce riparian protection overlay and protection requirements in City of Sweet Home Development Code.
Measure: Track and document number of building permits, violations, and variances in protected areas. Track acres of protected area lost to approved variances.
Timeline: Ongoing; annual review
Benchmark: Strategy is in effect & ongoing.
Funding: Community & Economic Development Department
Status: There were no riparian variance requests in 2021. No riparian area was lost.

Strategy: Promote voluntary actions for protection and restoration of privately owned river front properties.
How: Use GIS to identify properties that visually lack native riparian vegetation and target those areas for outreach. Identify projects within the City that would be of interest to the South Santiam Watershed Council (SSWC). Reach out to SSWC to re-establish/enhance atrophied business relationships and connect SSWC with property owners where restoration would be beneficial. Work with SSWC and/or other conservation organization to identify a collaborative project. Comprehensive Plan Chapter 7, Policy #12, pg. 48. Distribute an informational brochure that provides information on the City's code requirements for development in riparian areas with development permits.
Measure: Provide property owners with SSWC information and natural resources code requirements with development permits. Track the number of restoration project proposals submitted. Document number of restoration projects with SSWC and landowners.

Timeline: Be involved with and provide support for at least one riparian project by 2025.
Benchmark: Year 1: Meet with WSC to identify potential projects; prioritize project list and identify how City may be able to support or facilitate priority project(s).
Year 2: Determine funding needs for project(s) and identify funding sources; may include applying for a grant
Years 3-5: Implement project
Funding: Community & Economic Development Department
Status: CEDD provides the riparian code with the building permit packet as needed. The City reached out to the WSC in fall of 2021 but the WSC functions have been severely limited due to the pandemic and they have no immediate projects planned.

Staff capacity in CEDD continues to be a limiting factor. Administration is reluctant to increase staff capacity or funding in this area until the new SWMP is complete (described later in this report).

Strategy: Develop and implement a riparian vegetation plan for Sankey Park.
How: Develop a plan of priority projects that takes into account protection of riparian vegetation, public access and enjoyment of natural resources in the park, and safety concerns of Police and Code Enforcement.
Measure: Develop a riparian maintenance plan. Restore native riparian vegetation by removing invasive species (esp. blackberries) and replanting native vegetation. Track labor hours to restore and maintain riparian areas. Track area of treatment (sq ft or acres). Document outreach and coordination with SSWC youth watershed group and the high school to utilize student volunteers/class projects for planting & maintenance projects.
Timeline: Initiated in 2018; ongoing
Year 1-2: Develop priority list of projects sites and timeline for implementation.
Years 3-5: Implement priority restoration projects.
Benchmark: 2021-22 Identify existing plant species on Ames Creek through Sankey Park so we can identify & prioritize areas needing restoration. Collaborate interdepartmentally to develop a riparian maintenance plan.
Annual maintenance of restored riparian areas at City parks.
Funding: Community & Economic Development Department and Parks fund
Status: The riparian vegetation management plan has been deferred because CEDD is working on an updated wetland delineation for Sankey Park. Previous quotes for the wetland delineation and a FEMA Letter of Map Amendment were approximately \$30k. Neither the stormwater fund or the parks fund has enough budget for this project. The bulk of our stormwater fund has been committed to the Stormwater Master Plan Update. We are continuing to save up the needed funds for the wetland delineation.

The COVID-19 pandemic prevented us from conducting our annual volunteer park cleanup project in 2021. The annual cleanup event resumed in May 2022, which is outside the reporting period.

PW Maintenance spent approximately 30 labor hours maintaining 50,000 sf of Ames Creek riparian area at Sankey Park (1000 linear feet along creek) which had invasive species removed in 2018.

1.2 Temperature Source: Wastewater Treatment Plant Discharge

Strategy: Maintain effluent low temperatures.
How: Maintain compliance with NPDS permit #101657 requirements.
Measure: Monitor effluent and river temperatures as a condition of the DEQ discharge permit.
Timeline: Ongoing.
Benchmark: Provide documentation showing that effluent complies with permitted limits.
Funding: Wastewater Enterprise fund.
Status: The City's wastewater effluent temperature complies with our NPDES permit.

2.0 Strategies for reducing Bacteria Pollution

“Sources of bacteria include discharges of untreated or poorly treated sewage resulting from malfunctions or overflows, and runoff that carries feces from pets or wildlife.” (source: [Oregon DEQ Pollution Control Tools and Programs](#))

2.1 Bacteria Source: Wastewater Treatment Plant Discharge

Strategy: Maintain effluent low bacteria levels.
How: Maintain compliance with NPDES permit #101657 requirements.
Measure: Monitor effluent bacteria levels as a condition of DEQ discharge permit.
Timeline: Monitoring in progress & ongoing. WWTP capacity improvement engineering began 2018; construction anticipated 2020-2022.
Benchmark: Provide documentation showing that effluent complies with permitted limits. WWTP scheduled for capacity improvement project.
Funding: Wastewater Enterprise fund.
Status: The City's wastewater effluent bacteria level complies with our NPDES permit. The WWTP Upgrade Project in final design and has been split into two construction phases to meet funding source deadlines. Phase 1 construction is expected fall 2022 through summer 2023. Phase 2 construction is expected summer 2023 through summer 2025. Construction observation will increase staff workload by 1 FTE and this position will be funded through the project budget.

The City terminated contract plant operations and began in-house operations on July 1, 2021. We have successfully implemented several equipment repairs and process improvements, and it is estimated that in-house operations will save \$100-200k annually in the water and wastewater funds compared to the contract operations expense. We also hope that this greater level of control will allow us to mitigate the number and/or severity of overflow events resulting from storm events and equipment failure, until the plant improvements project is complete.

2.2 Bacteria Source: Sediments entering City stormwater collection system

<u>Strategy:</u>	Gauge public perception of stormwater issues and raise awareness of actions that individuals can take to minimize stormwater impacts.
How:	Publish educational materials in the local newspaper and City publications. Update website and/or Facebook page with information or links related to protection of surface water and drinking water, photos of volunteers, etc. Send informational inserts with water bills. Invite the public to share their opinions on stormwater issues using a variety of data gathering methods to reach multiple demographics. Use public opinion results to strategize educational efforts.
Measure:	Track publication of educational materials.
Timeline:	Gauge public perception of stormwater issues every 5 years beginning 2023. Update or re-evaluate website content annually. Add educational materials to Facebook page and bill mailing inserts, annually. Identify newsworthy information for publication in local newspaper, ongoing as opportunities arise.
Benchmark:	2020 Begin adding educational materials to City website and Facebook page. Establish internal procedure for sending bill inserts. 2023 Develop a locally appropriate method to gauge public perception across multiple demographics and implement it.
Funding:	Stormwater fund
Status:	Staff reviewed the stormwater webpage after last year's updates and found it satisfactory. No updates were made.
	We have established an interdepartmental procedure for running bill stuffers. We incorporated a public stormwater survey in our public engagement process for the Stormwater Master Plan Update. Consultant engineers and City staff drafted a survey form which included benchmark questions about public perceptions, conducted the survey via two public meetings on April 13 and on the City website for approximately a month, and received 23 responses.
<u>Strategy:</u>	Install pet waste stations.
How:	Install pet waste bag stations in City parks.
Measure:	Complete installation and document use of bags.
Timeline:	Installation 2019. Maintenance of bag stations to be ongoing.
Benchmark:	Purchase and install bag stations.

Funding: Parks and Stormwater funds
Status: PW maintained six pet waste stations, one at each of six City parks.
Approximately 6400 pet waste bags were used during the reporting period.

Strategy: Install “This drain goes to stream” catch basin stickers.
How: Install “This drain goes to stream” stickers on about 450 remaining unmarked City catch basins. About 450 stickers were installed previously and many have gone missing or been damaged. Begin maintenance program to replace damaged/lost stickers by incorporating it with the catch basin inspection & maintenance. Coordinate volunteer efforts to install new stickers with local groups such as SSWC youth watershed group, Scouts, etc.

Measure: Approximately 100-200 stickers installed per year until all catch basins are marked and then maintain as needed for replacement.

Timeline: Incorporate sticker maintenance with catch basin inspection beginning 2019. Target completion for installation is 2024.

Benchmark: Establish annual sticker maintenance in conjunction with catch basin inspection & maintenance.
Contact local groups such as SSWC, Scouts, etc. that may be interested in volunteer project to install new stickers.

Funding: Stormwater fund
Status: PW maintenance staff incorporate sticker installation & replacement with the routine catch basin inspection & maintenance program. The catch basin maintenance program has been chronically understaffed due to staff turnover and vacancies. The stormwater maintenance program suffered another long-term vacancy in 2021 which has now been filled. Stormwater maintenance tasks have also been transferred from the collections crew to the streets crew, which we hope will provide for more stable staffing levels. Approximately 12 catch basins were inspected/cleaned/repared, which already had fish stickers. No new stickers were installed in the reporting period.

Strategy: Cleaning streets and drainage collection systems.
How: Maintain a budget and a schedule for street and catch basin cleaning. Perform ditch cleaning, catch basin cleaning, and street sweeping.
Catch basin inspections target is biennial. Ditch cleaning is as needed.
Street sweeping target is once per month in residential areas and once per week in business core.

Measure: Track miles swept, feet of ditch cleaned, and number of catch basins cleaned.

Timeline: Ongoing annually.

Benchmark: Continue sweeping & cleaning programs. Construct new paved dumpsite at Public Works facility in 2020.

Funding: Streets and Stormwater funds

Status: The stormwater maintenance program suffered another long-term vacancy in 2021 which has now been filled. Stormwater maintenance tasks have also been

transferred from the collections crew to the streets crew, which we hope will provide for more stable staffing levels.

We swept approximately 1200 miles. We cleaned approximately 2500 ft of ditches. We spent approximately 180 hours inspecting, cleaning, and repairing approximately 12 catch basins and approximately 1400 ft of storm conveyance pipe. Most of this time went toward cleaning a significant blockage on a major conveyance pipe, which together with the reduced staffing level, necessitated deferral of routine catch basin inspections.

Strategy: Fall leaf collection program.

How: Curbside collection of customer leaf piles in right-of-way on specified schedule.

Measure: Track annual loads/yards of leaves collected through the season.

Timeline: Begin 2018. To be ongoing annually.

Benchmark: 2018 Begin new program. Educate public on proper location of leaf piles. Program is by call-in appointment.

~~2019 Develop routes and maps, educate public on collection schedule.~~

Funding: Streets, Parks, and Stormwater funds.

Status: This was the fourth year of the fall leaf collection program. Public reception continued to be very positive. There were 320 leaf collection visits and 1500 cubic yards of leaves collected. We will continue running the program on a call-in basis since it's working so well, instead of developing routes.

3.0 Strategies for reducing Mercury Pollution

“Mercury is a potent neurotoxin that can cause damage to the brain and nervous system. Primary sources of mercury in the Willamette Basin are associated with nonpoint sources, namely the erosion of soils containing mercury and runoff from atmospherically-deposited mercury.” (source: [Oregon DEQ Pollution Control Tools and Programs](#))

3.1 Mercury Source: Sediments entering City stormwater collection system

Strategy: Decrease sedimentation and erosion from construction and new and re-development.

How: Work with Building Program and developers to ensure erosion control. Erosion control permit inspection & enforcement on impacted areas of 10,000 sf or more as per SHMC 13.06.030.

Include erosion control fact sheet in permit application packets for commercial and large residential projects.

Encourage developers to use Low Impact Development (LID) for stormwater infiltration and erosion control; eg. grassy swales, etc.

Require developers to provide confirmation of 1200-C permit for projects over 1 acre prior to issuing development permits.

Measure: Number of City erosion control permits issued under SHMC 13.06.030 and number of inspections/enforcement actions.
 Number of 1200-C permits confirmed.
 Building permit packets to include an erosion control fact sheet.

Timeline: Erosion control permits & construction inspections are in place. Fact sheet and LID information on City website to be included beginning 2020-21.

Benchmark: Find or create a locally appropriate erosion control fact sheet. Include it in building permit packet and post it to the City website.
 Promote LID on City website & refer developers to website.

Funding: Community & Economic Development Department and Public Works

Status: Staff confirmed online with the DEQ website that there appears to be 6 permits 1200-C permits issued by ORDEQ within the City Limits. A few of these may be outside the May 2021 and April 2022 time frame because the website had data search query errors.

Staff capacity in both CEDD and PW have continued to be the limiting factor on updating the building permit packet. A surge in construction activity has caused significant increases in workload, but administration has been unable to secure a funding source to increase staff capacity. We believe combining this strategy with the Stormwater Master Plan update and development code updates currently underway will provide for labor efficiencies and enable us to incorporate a best practices fact sheet into permit packets in 2022.

Strategy: Update development standards to protect water quality.

How: Update the City's Stormwater Master Plan (SWMP) and City codes to include water quality protection considerations and priorities. Update & modernize stormwater detention standard for development/redevelopment projects including clarifying the definition of qualifying projects and the design storm to be used.

Measure: City Council adopts updated SWMP. City Council adopts updated municipal codes.

Timeline: 2020 begin audit, 2023 adopt new plan & codes.

Benchmark: 2020 Audit stormwater code for necessary updates. 2021-2022 Retain a consultant to assist with code and SWMP updates. Evaluate DEQ's offered "Template for LID Stormwater Manual for Western Oregon" for local use. Review example codes and draft proposal language based on internal review and public comment.
 2023 City Council adopts revised codes after public process. Conduct public outreach/education about new codes.

Funding: Funding will be needed to retain a consultant for the Stormwater Master Plan update. City code update may also require funding for a consultant if staff resources prove insufficient.

Status: On May 11, 2021 City Council approved a stormwater rate increase from \$1/month to \$3/month. This is a major step toward our stormwater utility becoming financially solvent.

The SDC Update project is complete.

The Stormwater Master Plan Update is underway. Consultant engineers have conducted a public input survey and are creating a stormwater system model to identify necessary improvements. The SWMP update scope includes a review of stormwater regulations regarding water quality to identify tasks that can be incorporated into the long-term stormwater system management strategy.

The development code update is underway. Throughout the reporting period the Planning Commission reviewed the proposed overhaul of the development code monthly. It is expected they will make a recommendation with minor adjustments to the City Council in June 2022.

Strategy: See above strategy for Bacteria: Gauge public perception of stormwater issues and raise awareness of actions that individuals can take to minimize stormwater impacts.

Strategy: See above strategy for Bacteria: Cleaning streets and drainage collection systems.

4.0 Strategies for all pollutants

Strategy: Staff training on routine maintenance activities to protect water quality.
How: Conduct annual staff training on stormwater protection as it relates to Public Works field activities such as dechlorinating water flushed from hydrants, vehicle maintenance, what to do if they find an illicit discharge, etc.
Measure: Record training dates and topics.
Timeline: 2020 Incorporate stormwater into training topics rotation and conduct annually.
Benchmark: 2019 Develop stormwater training session content relevant to Public Works activities.
Funding: Public Works
Status: We conducted on-the-job tailgate training with several new hires as needed for the task of the day, including proper dechlorination procedures when flushing hydrants, confined space entry for catch basin cleaning, operator training for pipe CCTV and cleaning equipment, street sweeping, and dumping of sweepings.

Strategy: City Council update of TMDL Program. Implementation Plan and annual report or five year review are presented to Council at least annually.
How: Present 5-year Implementation Plan or Annual Report to City Council annually.
Measure: City Council meeting minutes document presentation.
Timeline: Begin 2019 and continue annually.

Benchmark: Set up a recurring Council agenda item/reminder to present TMDL Plan or Report each year.
Funding: Administration and Public Works
Status: Staff last presented the annual report to City Council on March 23, 2021 along with a heads-up that there is a new mercury rule which may increase our required actions. This annual report will be presented to City Council at the next meeting on June 28, 2022.

Strategy: Investigate and resolve illicit discharges.
How: Respond to call-in reports from citizens. Inspect for illicit substances during catch basin inspections. Follow up on suspected violations with site visits and property owner contact as needed.
Measure: Track number of illicit discharge complaints, follow-up actions/ investigations. Update city code to address discharge violations as part of previous strategy "Update Stormwater Master Plan and City codes to protect water quality."
Timeline: Reports of illicit discharges are investigated upon receipt. Update code by 2023.
Benchmark: On catch basin work order form add a comment line for illicit substance notes. Additional benchmarks same as previous strategy "Update Stormwater Master Plan and City codes to protect water quality."
Funding: Stormwater fund
Status: There were no illicit discharge complaints in the reporting period.

Strategy: Maintain up-to-date stormwater system map.
How: Use GIS or other software/ program to publish a stormwater system map that can be updated as needed.
Measure: Completion of updated system map.
Timeline: Ongoing.
Benchmark: Updated Map.
Funding: Stormwater fund
Status: Updates to the stormwater map have been made to correct spatial inaccuracies and add missing features, ongoing as discovered. Consultant engineers are also updating the GIS with collected survey data at strategic locations and using it to create a stormwater system model as part of the Stormwater Master Plan update.