

CITY OF WILLAMINA

TMDL IMPLEMENTATION PLAN

August 2022



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TMDL Implementation Plan 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.

A handwritten signature in black ink, appearing to read 'Sarah Frøst', is written over a horizontal line. The signature is stylized and cursive.

Sarah Frøst
Interim Willamina City Manager
NE C Street
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ACRONYMS

BMPs	Best Management Practices
CS	Construction Site Runoff
CWA	Clean Water Act
City	City of Willamina
DEQ	(Oregon) Department of Environmental Quality
DMA	Designated Management Agency
ESCP	Erosion and Sediment Control Plan
EPA	United States Environmental Protection Agency
GYWC	Greater Yamhill Watershed Council
IDDE	Illicit Discharge Detection and Elimination
LID	Low Impact Development
LUCS	Land Use Compatibility Statement
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
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
SWCD	Soil and Water Conservation District
TMDL	Total Maximum Daily Load
TSS	Total Suspended Solids
USGS	United States Geological Survey
WQMP	Water Quality Management Plan

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The City of Willamina is submitting this TMDL Implementation Plan in response to the **2019 Final Revised Willamette Basin Mercury TMDL and WQMP**

Load Allocation. The load allocation goal for the Willamette Basin calls for a 75% reduction of mercury. The City of Willamina anticipates that their obligations for contributions will be met with full implementation of the management strategies listed in this plan.

1.0 INTRODUCTION

1.1 Background

A Willamette Basin Mercury TMDL was first issued in 2006. On November 22, 2019 DEQ issued the *Final Revised Willamette Basin Mercury Total Maximum Daily Load and Water Quality Management Plan* that was submitted to the EPA. The final TMDL and Water Quality Management Plan (WQMP) states mercury reductions which can be achieved through planned implementation of permits, best management practices, conservation practices, and other management strategies help reduce mercury entering waterways. The ultimate goal of this process is to provide full restoration of the beneficial use of fish consumption, including protection of aquatic species and wildlife throughout the Willamette Basin.

According to DEQ the goals, objectives and approaches of this TMDL are consistent with the requirements of the federal Clean Water Act (CWA) and Oregon water quality laws and implementing regulations.

On March 3, 2021 the City of Willamina was notified that DEQ had included Willamina as a designated management (DMA) agency in the Willamette Basin Mercury TMDL and WQMP. According to Oregon Administrative Rules (OAR 340-042-0030(2)) *means a federal, state or local governmental agency that has legal authority over a sector or source contributing pollutants, and is identified as such by the Department of Environmental Quality in a TMDL.* DMAs are responsible for implementing strategies and DMA specific TMDL Implementation Plans.

1.2 Summary of TMDL Plan Development

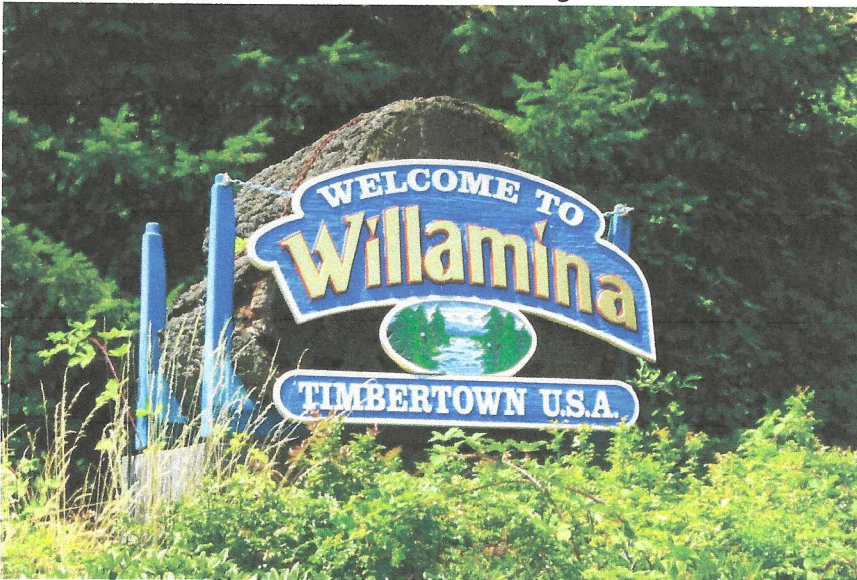
The TMDL Implementation Plan was developed to meet the conditions of the WQMP and the requirements listed in Table 13.11 of that document. Timelines are consistent with Table 13.14. The TMDL Implementation Plan includes a narrative which is captured in Sections 1 through 4 of this document, and a list of BMPs in Appendix A. A comprehensive, 'at-a-glance' matrix is included in Appendix B.

The City chose to use a consultant to develop the plan based on factors such as a small staff with limited knowledge of the program and environmental conditions. The consultant was hired in August 2021.

Initial steps for plan development focused on formation of the BMPs to be used by the City as a new TMDL DMA. Emphasis has been placed on foundation building activities and training to allow staff to review existing water quality based actions that could be expanded upon. The consultant has provided basic program training to staff with additional training to the City Manager and Public Works Director.

1.3 The City of Willamina

Willamina incorporated on 2/13/1903. According to the 2020 census, the population is presently 2270. The City is located near the intersection of Oregon State Highway 18 and Oregon State Highway 22. Willamina is located in the southern-most portion of Yamhill County. Willamina lies near the confluence of Willamina Creek and the South Yamhill River near the eastern base of the Oregon portion of the Pacific Coast Range.



The City has a Mayor/Councilor type leadership system with 1 Mayor and 6 City Councilors. The City is in a transition period. While Willamina was once primarily a mill town, it has now reconfigured into a mix of commuters, artists, local workers, and retired residents. It is known within the region as 'Festival City'. It has also become a popular spot for those with 'work from home' employment. The artist community is alive and well and the City is a stop along the annual Art Harvest Studio Tour sponsored by the Arts Alliance of Yamhill County.

2.0 HYDROLOGICAL CONDITIONS / EXISTING CONDITIONS

2.1 Hydrology Yamhill Subbasin / South Yamhill River / Willamina Creek

The Yamhill Subbasin (Hydrologic Unit Code 17090008) is located in the Western portion of the Willamette Basin and drains portions of the Coast Range. The Yamhill River flows into the Willamette River to the east of Dayton. The Subbasin's 772 square miles (493,762 acres) include the following eight watersheds: • Willamina Creek Watershed • Agency Creek-South Yamhill River Watershed • Mill Creek Watershed • Deep Creek-South Yamhill River Watershed • Salt Creek Watershed • North Yamhill River Watershed • and the Yamhill River Watershed. The subbasin is within portions of Yamhill and Polk counties, and includes the Cities of Amity, Carlton, Dayton, Lafayette, McMinnville, Sheridan, Willamina, and Yamhill. The subbasin is primarily owned by private landowners, however federal and state ownership accounts for 14% of the total land use in the subbasin. There are scattered landholdings by the U.S. Forest Service and Bureau of Land Management. The subbasin consists of forestry, agriculture and urban land uses. Timber harvest was the foundation for the development of the City of Willamina.

Waterways include the South Yamhill River, Willamina Creek. Ash Creek lies just outside of the City's boundary.

Willamina Creek originates in the Coast Range, and discharges to the South Yamhill River in Willamina. Willamina Creek passes through agricultural land, but it is well forested in the upper reaches of the watershed.

2.2 City Services

The City's operations and maintenance of public utilities and parks are carried out by Public Works staff which includes 5 personnel including the Public Works Director.

Drinking Water

The City's drinking water source is Willamina Creek. Treatment and distribution are managed by the City of Willamina Public Works personnel. The City is notified of logging activities in the watershed. The City has developed BMP PE-6 and PI-3 to address protection of Willamina Creek.

Wastewater

Willamina's wastewater system is permitted under NPDES # 101070. Prior to treatment and discharge, wastewater is held in 4 lined lagoons. The City utilizes an air diffusing system for odor control. Wastewater is discharged to the South Yamhill River.

Stormwater

The City's stormwater system is maintained and operated by the Public Works Department personnel. Maintenance activities are conducted by all staff members and primarily on a reactive basis. Street sweeping is an ongoing activity. Catchbasin cleaning occurs when time is available, but an attempt is made to clean all catchbasins annually. The City has a master plan that was completed in 6/1999.

2.3 Existing Conditions and Pollutant Sources

Pollutant sources coming from Willamina are similar to those in other northwestern Oregon municipalities of their size, but Willamina does have a long history of discharge from the existing wood mill, Hampton Lumber which was established in 1952. Logging trucks delivering products to the mill may add an additional elevation in pollutants associated with this type of vehicle. The City has a downtown core, residential areas, City parks, and some limited industrial activity. Growth is on the rise in Willamina with new subdivisions being planned for the community. New growth has been notable in the last 2 or 3 years.

The City is surrounded by some large parcels of land that are linked specifically to agricultural uses. It is also transected by state highway 18 and lies just a few miles north of state highway 22.. This land use provides the potential for a pollutant sources from automobile use, heavy farm equipment, logging trucks, wood processing, and agricultural chemicals.

The City of Willamina would like to make note that according to the WQMP, the Oregon Department of Agriculture (ODA) is DMA under OAR 340-042-080(3). The Agricultural Water Quality Management Act (ORS 568.900 to 933), and ORS 561.191, give ODA the responsibility to adopt and enforce rules that protect water quality on agricultural lands." DEQ works directly with ODA for implementation of these rules. Willamina recognizes that pollutants coming from agricultural sources may need some sort of correction that would be driven by the ODA and DEQ.

2.4 Control Measure Discussion

Management strategies for the implementation plan are directed toward the six control measures listed in Table 13.11 of the WQMP. A list of Willamina's BMPs and details regarding each are included in Appendix B. In addition, more specificity about the 6 control measures are covered in sections 3.1 and 3.2.

3.0 MERCURY REDUCTIONS

3.1 General Approach for Mercury Reduction

The City of Willamina will put the majority of its efforts for this permit term for mercury reduction into public education and preparing for the development that is occurring in other communities in Yamhill County. As was covered previously, there a number of local festivals and community events. Willamina will use these events to provide outreach materials to the residents with the City. These events are well attended and provide an excellent opportunity educate a wide variety of audiences.

Staff has developed the following list of target audiences. These target audiences will have messages and activities designed that pertain specifically to that group through key messages. Audiences such as the general public can receive a wide variety of messages through various means (brochures, articles, social media, etc.), if the target audience is school children for example, messages should be designed in a way that is useful for that group. Field trips or field presentations covering the impacts of mercury might be much more interesting for students.

Target Audiences for the City of Willamina

General Public

Students / School Children

Businesses

Industries

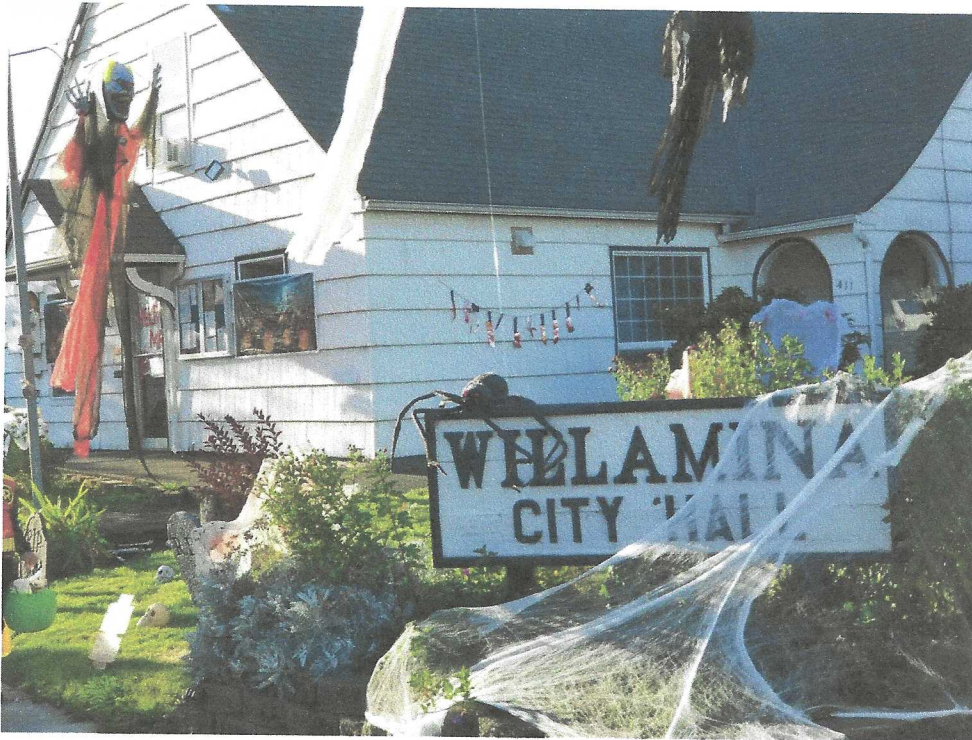
Landscapers

Developers/Builders/Engineers

Elected Officials / City Staff

The City will complete messages in 2022/2023 that can be used for each of the target audiences over the 5 year term and beyond. Records will be maintained in order to make certain all audiences are being reached and what factors indicate success or poor performance to fine-tune efforts over the permit term. It is expected that Willamina will continue to focus on Public Education as a core control measure. The City recognizes that activities presented to an educated public will provide for long term success.

Erosion control is another area of emphasis in this strategy. The BMPs listed in matrix indicate that Willamina intends to move forward during the first implementation term in regard to proper management of disturbed soils to the maximum extent practicable given existing conditions. Given current growth patterns, it is prudent that Willamina give proper attention to the construction site runoff control measure.



Section 3.2 Assessment of Stormwater Measures (WQMP Table 13.11)

According to the WQMP, DEQ expects these DMAs [cities with less than 5,000 people] to evaluate the six minimum stormwater control measures and identify the strategies and actions in TMDL implementation plans that they can implement to reduce mercury and sediment. Cities with less than 5,000 people must also provide information to DEQ about specific limitations to implementing strategies that the city does not include in its implementation plan.

An assessment for the stormwater measures follows:

The City does not have a stormwater utility and does not have a stormwater fee in place. There are only 5 Public Works employees, including the Public Works Director, operating and managing Willamina's streets, stormwater, wastewater, drinking water, and parks. There is an obvious lack of staffing to fully implement, and especially enforce, the BMPs listed for several of the control measures. Currently all Public Works employees respond to infrastructure needs regardless of funding allocations. In addition, the City has been subject to transitional management in the last several years. The most recent City Manager left the organization in June 2022 and has been vacant for the bulk of the summer. The position is currently being filled.

The lack of funding for the program will need to be evaluated and amended in subsequent years. Public Education – This control measure will be fully implemented according to the BMPs listed in the matrix, Appendix B, and as discussed in Section 3.1

Public Participation and Involvement – This control measure will be fully implemented and a City Council presentation will be held on October 11, 2022. The BMPs are listed in Appendix A with source, timelines, and milestones listed in Appendix B.

Illicit Discharge Detection and Elimination – Illicit discharge requires a full identification and response program, and the legal means to enforce on violators. Limited staffing prohibits the rapid response that full implementation requires. The City will be moving forward during the first implementation term with building a foundation for this program. Willamina will utilize the consultant for training in report year 1 so that staff fully understands the control measure. Willamina will also develop and publicize a way for citizens to report discharges. Staff will respond and provide clean-up or abatement when possible. This control measure will be partially implemented within the 5 years.

Construction Site Runoff Control - This control measure will be partially implemented within the 5 years. Limited staffing prohibits the full implementation of this control measure. As has been noted, the organization does not have the personnel or training to fully implement the program within a 5 year period. Until the program is fully developed, staff will focus on educational efforts directed at builders and developers. Staff will also familiarize themselves with the conditions of the 1200-C program in order to communicate accurate information and communicate efficiently with DEQ for state held permits. The consultant will provide year 1 training and personnel will be encouraged to attend regional training. In addition, a resource guide will be developed for staff to use in the field and when reviewing plans.

Post-Construction Runoff Control - This control measure will be partially implemented within the 5 year implementation term. The consultant will provide training for staff on this control measure and the City's consulting engineer will be able to determine what needs to be done to amend design standards.

Good Housekeeping – This control measure will be fully implemented within the first 5 years of program implementation.

3.3 Public Involvement

The City of Willamina has been working on development of its TMDL plan since August 2021. The existing City Manager has since left the organization, but staff has succeeded in moving forward with development of the program.

The City Council has scheduled a Work Session for October 11, 2022. The TMDL Implementation Plan and all subsequent materials will be posted to the City website upon submittal of the document to DEQ. Additional BMPs for this measure are listed in the matrix.

3.4 Land Use Compliance

Land use compatibility information is contained in Appendix C



3.5 Fiscal Analysis

The City maintains and funds streets, wastewater, and water budgets. Willamina does not have a stormwater utility. The City's budget documents can be accessed at [Willamina, OR \(willaminaoregon.gov\)](http://Willamina,OR(willaminaoregon.gov)). The City is currently in the process of recruiting a new City Manager. With this position filled, new leadership may be able to prioritize funding goals.

The City recognizes that a solution needs to be agreed upon for sustainable funding for the program and will enter into those discussions as part of program implementation. DEQ states there is more flexibility for cities with populations < 5,000. Existing staff is aware of the time it will take to secure funding. This should be a priority for the City in subsequent years.

4.0 IMPLEMENTATION PLAN MANAGEMENT

4.1 Annual Reporting

Willamina will submit yearly reports documenting the progress of the TMDL program for the year. During the 5th year of the implementation period, the City of Willamina will submit a program evaluation and assessment according to guidance provided by DEQ. This portion of the annual progress report will also include the public education evaluation and assessment required in the WQMP as listed in Table 13-11.

The five-year evaluation shall be submitted every 5th year with a deadline to be determined by DEQ.

The City of Willamina requests that their report year start on November 1st of each year and end on October 31st. Yearly reports will be completed and submitted on December 1st of each year with Report 1 being submitted on December 1, 2023.

4.2 Performance Monitoring/Plan Review

The City of Willamina will annually review its TMDL plan and BMPs to determine if the plan is functioning as designed and if Adaptive Management needs to be applied. The annual review will include, but is not limited to a review of BMPs and records kept throughout the report year. An assessment will be developed and submitted to DEQ each year with the annual report.

4.3 Matrix

The matrix, Appendix B, included with this implementation plan includes mercury source, strategy, and timeline for meeting the strategy. The matrix is based on the control measures listed in Table 13.11 of the WQMP but are in the order listed in permitted agencies.

- 1 – Public Education
- 2 – Public Involvement and Participation
- 3 – Illicit Discharge Detection and Elimination
- 4 – Construction Site Runoff Control
- 5 – Post Construction Runoff Control in new and Re-development
- 6 – Good Housekeeping in Municipal Operations

The matrix will be used as the primary tool for the annual report with program progress listed in the status column. Adaptive Management strategies will be noted in the matrix.

BMP LIST

BMP	Description
PE-1	Maintain a website to post the most current TMDL information
PE-2	Develop a resource portfolio of outreach messages for the identified target audiences
PE-3	Provide educational opportunities and material to students
PE-4	Print brochures for City Hall and Library
PE-5	Maintain and stock pet waste stations (voluntary activity)
PE-6	Support the Greater Yamhill Watershed Council
PI-1	Annual presentation to City Council
PI-2	Maintain a website to post the most current environmental educational information
PI-3	Support and help organize a 'friends' group for local waterway
ID-1	Develop a map of the stormwater conveyance system
ID-2	Develop a mechanism to take citizen reports and respond
ID-3	Develop, implement, and enforce a program to detect and eliminate illegal discharges into the stormwater system
ID-4	Evaluate prohibited and allowed discharges to determine what applies to Willamina
ID-5	Develop and enforcement response plan (see CS and PC)
ID-6	Annual employee training
CS-1	Familiarize key staff with the 1200-C program. Provide notice to developers when a 1200-C permit is needed and notice DEQ
CS-2	Develop a guidance manual and resource guide
CS-3	Develop a city erosion control management program including regulatory ordinance
CS-4	Develop an enforcement (see ID and PC) response plan
CS-5	Recordkeeping
CS-6	Staff training
PC-1	Update design standards to require onsite management of stormwater consistent with DEQ requirements
PC-2	Develop and implement a long term maintenance program for Post Construction facilities
PC-3	Staff training
GH-1	Develop a Good Housekeeping Manual
GH-2	Develop or continue to implement a street sweeping program
GH-3	Develop a catchbasin cleaning program and implement
	Complete annual reports
	Evaluate public education activities according to WQMP
	Annually evaluate implementation efforts and program progress (monitoring)
	Complete 5 th Year Assessment and Evaluation

City of Willamina TMDL IMPLEMENTATION PLAN MATRIX 2022 – 2027 Report Year 1 Sept. 3, 2022 to Oct 31, 2023									
POLLUTANT: Mercury									
MCM #1 Public Outreach									
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 to know what progress is being made?	Status This is the annual reporting column. Make certain you draw DEQ here in the annual report ("FY 2023/2024 progress is listed in the status column of the matrix	
PE-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Maintain a website to post the most current TMDL information	Develop such as FAQ sheets, rotating articles, resource lists, etc Content of material shall be update annually	Minimal fiscal impact	Keep material posted to the website in 2022/2023 Provide DEQ a list in annual report	Occurs each year starting in 2021/23	Maintain a list of what is on the website in regard to this BMP including dates	Evaluating website design and how to best locate stormwater education material Text developed for intro to TMDL Implementation Plan	
PE-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	Develop a education portfolio of educational messages	To be used over the 5 yr term for educational activities	Included in budget for consulting services	Keep copies of materials and report to DEQ	2021/2023	Complete the BMP	Material being developed	
PE-3	Runoff from soil disturbance and direct discharge to waterway from riparian area	Provide educational opportunities and material to students	Classroom or field presentations	Small fund for incentive items or fees	Report number of students, speaker, topic and date	Occurs each year starting in 2024/2025	Reach out to teachers and potential speakers. Develop a list to be used on an ongoing basis		
PE-4	Runoff from soil disturbance and direct discharge to waterway from riparian area	Print brochures for City Hall, Library, and local events	Utilize material developed from education portfolio PE-2	Small cost for printing	Report on what material is used annually	Occurs each year starting in 2022/23	Restock and change messages		
PE-5	Bacteria	Maintain and stock pet waste stations (volunteer activity)	Develop a schedule to maintain stations	Existing Budget	Report activity in annual report	Occurs each year starting in 2021/23	Maintain schedule and stock bags	Pet waste stations are maintained	

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 to know what progress is being made?	Status This is the annual reporting column. Make certain you draw DEQ here in the annual report ("FY 2023/2024 progress is listed in the status column of the matrix
PE-6	Discharge from unvegetated riparian area	Support the GYWC or SWCD for use as educated speakers or the lead on restoration activities	Develop a relationship with the group and provide financial support or support in another manner	Unknown	Report activity in annual report	Occurs each year starting in 2022/2023	Maintain records on meetings and coordination with the group	GYWC has indicated a willingness to work with the City of Willamina
MGM #2 Public Involvement								
PI-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Educate City Council	Presentation	Staff time	Track dates, questions, and report to DEQ	Occurs each year starting in 2022/2023	Develop topic list to be reviewed and adjusted as needed	Work Session scheduled with City Council on Oct 11, 2022
PI-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	Maintain a website to post the most current TMDL information	Post TMDL plan to website to allow for public comment.	Staff time	Keep material posted to the website in 2022/2023 Provide DEQ a list in annual report	Occurs each year starting in 2022/2023	Maintain a list of what is on the website in regard to this BMP including dates	
PI-3	Runoff from soil disturbance and direct discharge to waterway from riparian area	Help organize and support a 'friends' group for Willamina Creek or other waterway	The purpose of this citizen's group would be to provide ongoing citizen interest in watershed protection	Staff time	Capture progress in annual report	Occurs each year starting in 2024/2025	Track progress and communication with residents	

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 to know what progress is being made?	Status This is the annual reporting column. Make certain you draw DEQ here in the annual report ("FY 2023/2024 progress is listed in the status column of the matrix
MCM #3 Illicit Discharge and Detection								
ID-1	Discharge to storm system and local waterways	Develop and maintain a current GIS map of the stormwater conveyance system	Utilize an outside agency or consultant	Utilize an outside agency such as a COG	Document annual progress	2025/2026	Work with the COG or other group. Explore possible options.	
ID-2	Discharge to storm system and local waterways	Develop a mechanism to take citizen reports and respond	Post a phone number on the website	Staff time	Document progress and findings from calls in each annual report	To occur each year starting in 2023/2024	Post information online including a phone number	
ID-3	Discharge to storm system and local waterways	Develop, implement, and enforce a program to detect and eliminate illegal discharges into the stormwater system	Develop an ordinance that prohibits illegal discharges	Staff time	Document annual progress	Complete draft ordinance by 2027	1. Explore ordinances from other municipalities 2. Discuss with City Council	
ID-4	Discharge to storm system and local waterways	Evaluate prohibited and allowed discharges to determine what applies to Willamina	For allowed non-stormwater discharges, develop operation activities to reduce potential water quality issues	Staff time	Document annual progress and findings	2023/2024	Evaluate activities to determine if BMPs need to be adjusted	
ID-5	Discharge to storm system and local waterways	Develop and enforcement response plan (see CS and PC)	Develop an integrated response plan	Staff time	Document progress in yearly report to DEQ	Complete by 2028	Develop the escalating enforcement response plan	

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 to know what progress is being made?	Status This is the annual reporting column. Make certain you draw DEQ ("FY 2023/2024 progress is listed in the status column of the matrix)
ID-6	Discharge to storm system and local waterways	Annual employee training	Utilize guest speakers, knowledgeable staff, etc	No fiscal impact	Document topics, dates, and attendees	To occur annually starting in 2022/2023	Consultant will conduct Year 1 training	
MCM #4 Construction Site Runoff								
CS-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Familiarize key staff with the 1200-C program. Provide notice to developers when a 1200-C permit is needed and notice DEQ	Utilize material and knowledge from other municipalities, attend regional training, etc.	Small budget for training	Document activities and progress in annual report	2024/2025	Develop a notification process in Year 1. Look at other small agencies covered under the 1200-CN	
CS-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	Develop a guidance manual and resource guide	The manual is to be utilized by staff to provide erosion control basics before full implementation of the control measure	Budget for consulting services	Distribute manual and document progress to DEQ	2022/2023	Complete the manual	
CS-3	Runoff from soil disturbance and direct discharge to waterway from riparian area	Develop a city erosion control management program including regulatory ordinance	Develop an ordinance and program that is consistent with the 1200-CN	Staff time	Document annual progress in yearly report	Complete in 2028	Complete ordinance by 2028	
CS-4	Runoff from soil disturbance and direct discharge to waterway from riparian area	Develop an enforcement (see ID and PC) response plan	Develop an integrated response plan	Staff time	Include findings and progress in annual report	Complete no later than 2029	Develop the escalating enforcement response plan	

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 to know what progress is being made?	Status This is the annual reporting column. Make certain you draw DEQ here in the annual report ("FY 2023/2024 progress is listed in the status column of the matrix)
CS-5	Runoff from soil disturbance and direct discharge to waterway from riparian area	Recordkeeping	Utilize a database for pending, open, and closed projects	Staff time	Include findings and progress in annual report	Commence in 2022/2023	Develop the recordkeeping process and implement	
CS-6	Runoff from soil disturbance and direct discharge to waterway from riparian area	Staff training	CESCL for lead inspector and certification and annual training	Staff time	Document annual activities and provide to DEQ in annual report	2025/2026	Document annual training including date, topic, and # of employees	
MCM #5 Post-Construction Runoff Control in New and Re-development								
PC-1	Runoff from soil disturbance and impervious surfaces	Update design standards to require onsite management of stormwater consistent with DEQ requirements	Use DEQ regulations to set standards. Utilize other agency material	Utilize an engineering consultant	Document annual activities	Complete no later than 2031	Maintain records of activities associated with this BMP	
PC-2	Runoff from soil disturbance and impervious surfaces	Develop and implement a long term maintenance program for Post Construction facilities	Utilize other agencies process if possible, such as CWS	Staff time	Document annual activities	Complete no later than 2030	Develop the maintenance program	
PC-3	Runoff from soil disturbance and impervious surfaces	Staff training	Training will occur annually to allow staff to become familiar with these regulations	Training budget	Document training dates and topics	Annual training	Training to commence in 2023/24	

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 to know what progress is being made?	Status This is the annual reporting column. Make certain you draw DEQ here in the annual report ("FY 2023/2024 progress is listed in the status column of the matrix)
MCM #6 Good Housekeeping in Municipal Operations								
GH-1	Discharge from City managed activities	Develop a Good Housekeeping Manual	Review and revise the manual every 5 years	Staff time	Describe progress in yearly report	2024/2025	Complete manual	
GH-2	Discharge from City managed activities	Develop or continue to implement a street sweeping program	Develop a process and implement	This activity can be contracted	Describe process in yearly report	2024/2025	Assess options that will have the best outcome	Street sweeping is conducted
GH-3	Discharge from City managed activities	Develop a catchbasin cleaning program and implement	Develop a process and implement	This activity can be contracted	Describe process in yearly report	2024/2025	The goal will be to clean 40% of catchbasins annually	Catchbasins are cleaned but as time allows or based on immediate need
		Annual Report	Consultant to develop the first annual report	Consultant	Submit to DEQ by 2023 due date	2022/2023	Complete the plan	
		PE Assessment and Evaluation	Review outreach efforts and collected data	Consultant	Submit to DEQ by 2023 due date	2022/2023	Consultant will work with staff for this BMP	
		Program Evaluation	This is performance monitoring and will be completed through annual review of the program	Consultant	Submit to DEQ by 2023 due date	2022/2023	Consultant will work with staff for this BMP	

7 | Willamina TMDL Imp Plan – APPENDIX B

	5 th Year Evaluation	Follow instructions from DEQ	Staff time	Submit to DEQ by the required date	2027 or as determined by DEQ	Review and correlate all records from the 5 year term	



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August 25, 2022

Attn. Sarah Frost, Interim City Manager
City of Willamina
411 NE C Street,
Willamina, OR. 97396

RE: City of Willamina TMDL Implementation Plan

Dear Sarah,

The purpose of this letter is to provide acknowledgement of land use compatibility for the City of Willamina Mercury TMDL Implementation Plan. The City is undertaking this work as required by the Final Mercury TMDL for the Willamette Basin issued by the EPA in 2021. As required by the Clean Water Act and the State of Oregon, Willamina's TMDL Implementation Plan was developed to reduce pollutants of concern in the Willamette Basin to "assure beneficial uses of the river and tributaries". Willamina's plan addresses **mercury** which makes fish consumption a potential human health issue.

Regarding land use compatibility, the City of Willamina Comprehensive Plan is acknowledged by the Oregon Department of Land Conservation and Development (DLCD) to be generally consistent with the adopted statewide planning goals. Best Management Practices (BMPs) for water quality are generally consistent with adopted goals and implementing policies in the Willamina Comprehensive Plan and the Willamina Development Code, some of which are detailed below for your reference.

WILLAMINA COMPREHENSIVE PLAN:

The Willamina Comprehensive Plan is dated 2010. The Resource Element contains a "Natural & Cultural Resources, Natural Resource Quality, and Natural Hazards & Limitations" background document from 2000. The detailed background document identified surface and groundwater quality challenges, and provided recommendations for water quality improvement which informed City goals for water quality protection.

The Comprehensive Plan Resource Element contains the following Objectives, each with implementing policies:

1. *To protect and enhance the fisheries potential and associated wildlife habitat of the South Yamhill River, Willamina Creek, and Willamina Pond.*
2. *To preserve the surface water resources of Willamina Creek and to protect Willamina's water quality through compliance with federal, state, and regional water quality standards.*
3. *To support regional efforts to improve the water, health, and habitat in the Willamina Creek Watershed.*

WILLAMINA DEVELOPMENT CODE:

The Development Code serves to implement the goals and policies identified in the Comprehensive Plan. Some specific code sections related to the TMDL Implementation Plan include:

1. *Section 2.115.05 Standards for Stream Corridor Areas.* Applies to areas within fifty (50) feet of the highwater line of the South Yamhill River and/or Willamina Creek. Prohibits development and vegetation removal within a stream corridor area within the stream corridor area. Stream corridor areas shall be protected through 1) dedication to City, HOA common area, or conservation easement.
2. *Section 2.204 Storm Drainage,* "Purpose: To provide for the drainage of surface water from all residential, commercial and industrial development; to minimize erosion; to reduce degradation of water quality due to sediments and pollutants in storm water runoff." This section includes some storm drainage standards for new development reviewed by the City.

In my review of the City's adopted objectives, policies, and standards, and through discussion with the City Engineer, Jesse Fields of Keller Associates, I observed that the City's current storm drainage standards emphasize storm water quantity (flood prevention) more so than quality (contaminants). It is our recommendation that the City pursue code amendments to strengthen Section 2.204 Storm Drainage section of the Willamina Development Code. Upon reviewing the TMDL Implementation Plan's BMP List, I note "Update design standards to require onsite management of stormwater consistent with DEQ requirements." Presumably this is the same goal, and our concern will be addressed through enhanced Storm Drainage quality standards.

In summary, the Willamina TMDL Implementation Plan is not found to be in conflict with City goals, policies, or procedures contained within either the Comprehensive Plan or Development Code. Further, staff supports the stated BMP to strengthen design standards included in either the Willamina Development Code and/or Public Works Design Standards to address storm drainage water quality.

You are welcome to contact me with additional questions.

Thank you,



Holly C. Byram
Contract City Planner, MWVCOG
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(503) 540-1617