



Oregon

Kate Brown, Governor

Department of Environmental Quality

Western Region Eugene Office

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TTY 711

April 30, 2018

Janelle Booth
4222 NE Old Salem Road
Albany, OR 97321

Re: Review and Acceptance of the 2018 TMDL Implementation Plan Annual Report for City of Millersburg

Dear Janelle Booth,

Thank you for submitting the Millersburg 2018 TMDL Implementation Plan Annual Report. The Department has reviewed your report and finds that the report complies with the annual reporting requirement. The city has met its obligation in implementing years one through four of the second five year TMDL cycle.

Please note that DEQ will closely track and enforce annual report and five year review dates. I would like to reaffirm that I am available as a resource to assist you as you move forward with TMDL implementation. Please feel free to contact me at (541) 687-7347 for assistance.

Best regards,

Priscilla Woolverton
Willamette TMDL Basin Coordinator

cc: Zach Loboy, Watershed Manager, DEQ
Kevin Kreitman, City of Millersburg

DEQ Western Region Eugene Office
165 E. 7th Ave.
Suite 100
Eugene, OR 97448
Attention: Priscilla Woolverton
Basin Coordinator
Watersheds and Stormwater
Woolverton.priscilla@deq.state.or.us
541-687-7347

May 12, 2017

Subject: Warning Letter with Opportunity to Correct
City of Millersburg-TMDL Implementation Annual Report
CEM.INT.12948
2017-WLOTC-2521

Dear Ms. Woolverton,

In accordance with the requirements of being a "Designated Management Agency" identified in Chapter 14: Water Quality Management Plan of the September 2006 Willamette Basin Total Maximum Daily Load, the City of Millersburg hereby submits its TMDL Implementation Plan Annual Report for February 1, 2016 through January 31, 2017.

For any questions, please contact Steven Hasson or Janelle Booth.

Regards,

Steven Hasson
City Manager, City of Millersburg

c.c.
Janelle Booth, PE
CH2M

TMDL Implementation Tracking Matrix: Millersburg, Oregon STATUS UPDATED FOR 2016-2017

Millersburg has legal authority over land use on 2,850 acres within the City Limits. The Willamette River forms the western boundary of the City between river-mile 15.5 and 17.75 for approximately 2.25 miles.

POLLUTANT <i>Pollutants Addressed by the TMDL.</i>	POLLUTANT SOURCES	STRATEGY <i>What Millersburg is doing and will do to reduce pollution from this source.</i>	ACTIONS <i>Specific Implementation Measures.</i>	BENCHMARKS <i>Intermediate indicators of progress.</i>	TIMELINE <i>Beginning and completion dates.</i>	MEASURE <i>Demonstrate implementation or completion of the strategy.</i>	STATUS
1.0 TEMPERATURE	A. Solar Radiation	Maintain existing riparian plantings and shading vegetation.	Code Enforcement of riparian and vegetative protections. http://cityofmillersburg.org/millersburg-land-use-development-code/	Compare aerial photographs at periodic intervals to determine the state of and changes to riparian areas.	Began with City's first Development Code in 1984 & 2006 and will be on-going.	Yearly review of standards compliance.	All activities within Millersburg have complied with standards regarding protection of existing riparian plantings and vegetation. In the summer of 2016, grass and shrub vegetation along Crooks Creek was cut to facilitate stormwater conveyance. This is a regular maintenance activity and was performed by the City of Millersburg. The City provided oversight of the contractor doing the work to insure no trees were removed and protect shading to the extent possible while maintaining the City's stormwater conveyance system.
		Encourage riparian plantings and shading vegetation on private property.	Contact property owners with un-vegetated drainage ways. Provide guidance to owners when requested.	Monitor new growth in riparian areas by visiting planting sites annually.	Seek public information documents for distribution immediately. An on-going project	Yearly review of private participation.	Millersburg has not identified any un-vegetated drainage ways on private properties. The main drainage ways through the city are currently vegetated (including those on private property). Guidance is regularly provided to property owners when they contact the City regarding what can be done on in riparian areas and wetlands. This guidance has been provided verbally or via email and has not been specifically tracked. City staff/consultants also performed periodic inspection of riparian areas to check for disturbance of riparian vegetation on private property. In 2016-2017, none was found. There are many maps showing the drainage ways within Millersburg, but Millersburg does not currently have an overall map of drainage ways for the City or a Stormwater Master Plan. The City is in the process of developing an RFQ for a Stormwater Master Plan and expects to begin working on the plan in 2017.
	B. Impervious Surface Runoff	Reduce paving and roof areas where applicable to reduce stormwater temperature increases.	Enforce maximum ground coverage standards.	Monitor subdivision and building plans.	In progress as part of the City's approval and permitting process.	Yearly review of compliance.	Subdivision plans are reviewed as a part of the City's approval and permitting process. During that review, street widths and paving areas are reviewed to insure they do not exceed the minimum required per the LUDC. The City is currently working with Linn County to confirm that individual building plans are being reviewed on a lot scale and amount of impervious surfacing is being addressed.
	C. Industrial Process Water Discharges	Enforce regulations for industrial process water cooling.	Enforce permitting requirements and continue to work with industries to reduce discharges.	Monitor compliance with permitting standards.	In progress as part of the City's approval and permitting process	Yearly review of compliance.	Millersburg is not in the line of approval and enforcement for industrial process water discharges. In the next update of the TMDL matrix, Millersburg proposes changing language to reflect that the city informs applicants of 1200-Z and 1200-C permit requirements and direct them to contact DEQ.
2.0 BACTERIA	A. Septic Systems (approximately 15% of	Enforce septic system maintenance and conversion to municipal sewer system.	Continue septic system inspections and expansion of municipal sewer system.	Monitor septic system compliance & document sewer system extensions	Ongoing Monitoring and Incremental expansion of municipal sewer by 2020.	Immediate goal will be the elimination of septic systems. On-going	Linn County Environmental Health is responsible for overseeing the onsite (septic system) program in Linn County.

	the City's dwellings are on individual septic systems)	Applicable Land Use Development Code Section 5.123				process.	In 2016 the City's sewer collection system was expanded to serve a previously unserved area in the northwest part of the city.
	B. Pet and animal waste	Continue to supply pet waste pickup stations. Enforce farm animal regulations.	City is providing waste collection stations at City Park. Code enforcement of farm animal raising.	Monitor usage of waste collection stations and farm animal compliance with City Code.	On-going. To be continued indefinitely.	Increased public awareness related to animal waste problems and provision of additional collection points for pet waste.	Continued providing waste collection stations (three at Millersburg Park and one at Acorn Park). City maintains and stocks stations. Approximate cost of maintaining the stations is \$500 per year (not including the original cost of the station itself). The City responds to complaints as needed regarding farm animal waste.
	C. Garbage spills	Encourage waste collection companies to cover waste bins during transit	Enforce current traffic code requiring covered loads	Monitor roadside debris accumulations	On-going. To be continued indefinitely.	Demonstrated reduction of roadside debris.	When there is a significant garbage spill or the city notices or is notified of a problem area, city staff often aid in cleanup. Staff time spent picking up roadside debris is not tracked.
3.0 MERCURY	A. Erosion and sedimentation containing mercury from existing background sources and introduced deposits from air and industries.	Eliminate erosion by reducing soil displacements and controlling runoff from excavations by utilizing silt fences, mulching, seeding, avoidance of excavations during wet times	Enforce Code standards for excavations and grading.	Building inspector will monitor compliance with Code standards.	On-going. To be continued indefinitely	All geotechnical evaluations are completed and one hundred percent compliance with Code requirements.	Where required, geotechnical evaluations have been completed. Code standards for excavation and grading have been enforced. Code standards for erosion and sediment BMPs are enforced during land disturbing activities.
			Require & monitor 1200-C permits for developments.	Demonstrate that 100% of new developments over one acre obtain 1200-C permits.	On-going. To be continued indefinitely	Maintain completion records of all issued permits in a Record File.	All permitted development projects over one acre are required to include erosion control, including a 1200-C permit. Erosion control measures are monitored by city staff.
4.0 INTERRELATED FACTORS	A. Stormwater Discharge, a contributing source factor for all three Identified Pollutants.	Provide stormwater detention and treatment.	Enforce existing regulations & maintenance inspections of existing facilities.	Monitor effectiveness of existing regulations and maintenance program.	On-going. To be continued indefinitely	Demonstrated effectiveness of the regulation and enforcement program	All new development is required to limit outflow to preconstruction conditions. This is accomplished through detention. Currently, Millersburg has no water quality treatment requirements for new development. As part of the upcoming MS4, water quality requirements will be implemented in the future.
			Preparation of a Stormwater Master Plan	Seek funding for a Stormwater Master Plan	Begin Research in 2009	Initiation and completion of a Millersburg Stormwater Master Plan.	The City is in the process of developing an RFQ for a Stormwater Master Plan and expects to begin working on the plan in 2017.
	B. Disposal & Recycling	Prevent Hazardous Waste & Illegal Discharges and Encourage Recycling.	Enforce existing disposal regulations and support existing recycling efforts.	Monitor and Record events And maintain a Record File of activities.	On-going. To be continued indefinitely	Review the Record File annually and report the findings to the City Council for implementation of needed adjustments.	There were no recorded hazardous waste or illegal discharges in 2016.
	C. Information Program for Clean Water Act and potential pollutants	Implement outreach and education activities for local industries and the general public	Contact DEQ for information sources and training programs.	Accumulation of available data.	Begin in 2009 and continue as an on-going program.	Council approval of an on-going Clean Water improvement program.	This has not taken place due to lack staff assignment and because it was not budgeted in previous years. Public outreach is a required component of the MS4 and will be addressed in the upcoming MS4 implementation process.
	D. Funding	Provide funding for planning and implementation of needed Programs to address pollution.	Seek funding sources.	Prepare a working list of potential funding sources.	Begin Research in 2009	Achieve funding to implement planning and implementation of needed programs	A list of funding needs and potential funding sources has not yet been developed due to lack of staff assignment. The City needs to develop these lists in order to facilitate implementation of the TMDL plan.
	E. Intergovernmental Cooperation	Achieve economies and expanded informational base through cooperative associations.	Contact local and statewide organizations addressing environmental issues.	Accumulation of contacts.	Begin in 2009 and continue as an on-going program.	Prepare an interrelated file of contacts addressing environmental issues.	The City has begun to establish contacts with other communities and ACWA as a part of the MS4 implementation process.