

Willamette Basin

TMDL Implementation Plan

Review Checklist for Approval



Part I: Geographic and Contact Information

Date Received (MM/DD/YY): **08/25/2022**
 DMA Name: Estacada
 Subbasin (s): Clackamas
 Receiving Waterbody (s): Molalla-Pudding
 Applicable TMDLs to your jurisdiction: temperature, bacteria, mercury
 County(s): Clackamas
 Population: 9,625

Contact Information:

Name: Andy Peters
 Title: Public Works Division Manager
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Part II: TMDL Implementation Plan Checklist to meet requirements in OAR 340-042-0080

	Component	Yes	No	NA	Comments
1	Identifies management strategies to achieve load allocations and reduce pollutant loading				
	All TMDL Pollutants:				
	a. Implementation plan identifies receiving waterbodies and describes NPS load allocations and water quality targets applicable to its jurisdiction (e.g. percent shade targets identified in TMDL).		X		Add in values- Agriculture, forest, shrub, developed, other (runoff and sediment) 88% Non-Permitted Urban Stormwater- 75%
	b. Known causes or suspected sources of pollutants identified	X			Pg. 2-5
	c. Management strategies proposed for TMDL pollutants are applicable for nonpoint source pollutant reductions and based on land use (urban, rural, etc.)	X			

	Component	Yes	No	NA	Comments
	d. Does the plan identify gaps in existing pollution control and strategies to address these gaps?	X			Matrix table
Stormwater Control Measures for Bacteria Reductions:					
	<p>a. DMAS WITH MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PHASE I & II PERMITS: <i>Note: DMAs that have MS4 permits will meet the majority of their bacteria TMDL requirements through implementation of their permit (determined by MS4 staff).</i> Plan contains urban/residential municipal stormwater control measures for bacteria reductions. Details of control measures may be covered in the permit or MS4 SW management plan.</p> <p>Plan is sufficient for addressing NPS strategies to reduce bacteria not addressed by MS4 permit.</p>				
	<p>b. NON-PERMITTED MS4 > 10K POPULATION: Plan contains urban/residential municipal stormwater 6 control measures for bacteria reductions & identifies how strategies will be implemented according to 2006 TMDL.</p>				
	<p>c. NON-PERMITTED MS4 < 10K POPULATION: Plan considered urban/residential municipal stormwater 6 Control Measures for bacteria reductions.</p>				
Stormwater Control Measures for Mercury Reductions: 2019 Mercury TMDL					
	<p>a. DMAS WITH MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PHASE I & II PERMITS: <i>Note: DMAs that have MS4 permits will meet the majority of their mercury TMDL requirements through implementation of their permit (determined by MS4 staff).</i> Plan contains MS4 strategies for mercury reductions. Details of control measures may be covered in the permit or MS4 SW management plan.</p>			X	
	<p>NPS stormwater requirements are described in Table 13-11 (pg. 92) in the WQMP:</p> <p>Plan and reporting matrix include a timeframe (per Table 13-14 on pg. 100) to implement the 6</p>				

	Component	Yes	No	NA	Comments
	SW control measures in jurisdictional areas outside of permit coverage by deadlines below, or includes a description of how the DMA is already meeting one or more of the requirements.				
	1. Pollution Prevention and Good Housekeeping for Municipal Operations (by Sept. 3, 2022)				
	2. Public Education and Outreach (by Sept. 3, 2022)				
	3. Public Involvement and Participation (by Sept. 3, 2022)				
	4. Illicit Discharge Detection and Elimination (by Mar. 3, 2024)				
	5. Construction Site Runoff Control (by Sept. 3, 2025)				
	6. Post-Construction Site Runoff for New Development and Redevelopment (by Sept. 3, 2025)				
	Plan describes some or all of the 6 SW control measures that are currently being implemented or ready to implement and strategies are sufficient for meeting Table 13-11 requirements.				
	b. DMAS WITHOUT MS4 PERMITS NPS stormwater requirements are described in Table 13-11 (pg. 92) in the WQMP. Plan and reporting matrix includes a timeframe (Table 13-14 on pg. 100) to implement the 6 SW control measures by deadlines below based on DMA population size.				
	b.1. CITIES > 10K				
	1. Pollution Prevention and Good Housekeeping for Municipal Operations (by Sept. 3, 2022)				
	2. Public Education and Outreach (by Sept. 3, 2022)				
	3. Public Involvement and Participation (by Sept. 3, 2022)				
	4. Illicit Discharge Detection and Elimination (by Mar. 3, 2024)				
	5. Construction Site Runoff Control (by Sept. 3, 2025)				
	6. Post-Construction Site Runoff for New Development and Redevelopment (by Sept. 3, 2025)				

	Component	Yes	No	NA	Comments
	Plan describes some or all of the 6 SW control measures that are currently being implemented or ready to implement and are sufficient for meeting Table 13-11 requirements.				
	b.2. CITIES 5K – 10K				
	1. Pollution Prevention and Good Housekeeping for Municipal Operations (by Mar. 3, 2024)	X			Pg. 43
	2. Public Education and Outreach (by Mar. 3, 2024)	X			Pg. 44
	3. Public Involvement and Participation (by Mar. 3, 2024)	X			Pg. 44
	4. Illicit Discharge Detection and Elimination (by Sept. 3, 2025)	X			Pg. 44
	5. Construction Site Runoff Control (by Sept. 3, 2030)	X			Pg. 45
	6. Post-Construction Site Runoff for New Development and Redevelopment (by Sept. 3, 2030)	X			Pg. 45
	Plan describes some or all of the 6 SW control measures that are currently being implemented or ready to implement and are sufficient for meeting Table 13-11 requirements.	X			
	b.3. CITIES < 5K				
	These cities are not required to implement all 6 SW measures, but they must provide specific limitations that prevent them from implementing measures at this time. Implementation timelines determined by DEQ based on info DMA provides.				
	1. Pollution Prevention and Good Housekeeping for Municipal Operations (by determined date)				
	2. Public Education and Outreach (by determined date)				
	3. Public Involvement and Participation (by determined date)				
	4. Illicit Discharge Detection and Elimination (by determined date)				
	5. Construction Site Runoff Control (by determined date)				
	6. Post-Construction Site Runoff for New Development and Redevelopment (by determined date)				
	Plan describes some or all of the 6 SW control measures that are currently being implemented				

	Component	Yes	No	NA	Comments
	or ready to implement and are sufficient for meeting Table 13-11 requirements.				
	c. COUNTY DMAS				
	<i>Note: Counties that have MS4 permits will meet the majority of their TMDL requirements through implementation of their permit (determined by MS4 staff). Counties without MS4 permits must implement the 4 control measures described below throughout the county jurisdiction.</i>				
	NPS requirements described in Table 13-12 (pg. 97) in WQMP: Plan includes a timeframe (Table 13-15 on pg. 101) to implement the 4 control measures by the deadlines specified below in jurisdictional areas outside of permit coverage (or throughout jurisdiction in absence of a MS4 permit), or includes language describing how the DMA is already meeting these requirements.				
	1. Pollution Prevention and Good Housekeeping for County Operations (Sept. 3, 2022)				
	2. Public Education and Outreach (Sept. 3, 2022)				
	3. Enforcement of Prohibited Pollutants (Mar. 3, 2024)				
	4. Construction Site Runoff Control (Sept. 3, 2025)				
	Plan describes some or all of the 4 control measures that are currently being implemented or ready to implement and are sufficient for meeting Table 13-12 requirements.				
	d. ALL DMAS Plan includes strategies to reduce runoff and erosion <u>directly</u> to waterbodies (i.e. not through a stormwater conveyance system). Examples could include riparian ordinances, protective environmental overlays, riparian restoration projects, etc.	X			Pg. 25
Implementation of Temperature TMDL					
	a. Temperature Management Plan is sufficient for reducing heat load over time.				
	b. Cold water refuges (Chapter 14 Willamette TMDL WQMP pg. 14-34)— <u>applies to DMAs</u>				

	Component	Yes	No	NA	Comments
	along the lower 50 RMs of the mainstem <u>Willamette</u> . Plans shall identify any cold water refuges and provide options for protecting or enhancing such areas.				
Implementation of Other Applicable TMDL Parameters (e.g. DDT, dieldrin, lead, chlorophyll a, pH, total phosphorus, etc.)					
	a. Plan contains sufficient management measures for reductions of TMDL pollutants				Address each TMDL pollutant here
2	Provide a timeline for implementing management strategies and a schedule for completing measurable milestones. These dates should be reflected in the reporting matrix.				
	a. Implementation dates identified	X			Pg. 25
	b. Completion dates identified	X			Consider adding these into mercury table
	c. Steps/milestones between start and completion of strategy implementation identified	X			
3	Performance monitoring with a plan for periodic review and revision				
	a. Monitoring the implementation of strategies As part of annual reporting, DMAs may use the reporting matrix table "status" column to track implementation of strategies.	X			Pg. 43-45
	b. Monitoring the success/effectiveness of the strategies implemented e.g. monitoring data, photo documentation, volume of sediment captured, percent survival of planted vegetation, etc.	X			Pg. 43-45
	c. Acknowledgment of annual report for describing the status of the implementation strategies that were selected for pollutant reductions.	X			Pg. 25
	d. Acknowledgment of the year 5 evaluation report for describing the effectiveness of the strategies implemented during the preceding 4 years and any adaptations to plan if strategies are not effective.	X			Pg. 25
	e. Adaptive management approach acknowledged for DEQ's re-evaluation, year 5 plan updates, or revision of the TMDL.	X			Pg. 25
4	Provides evidence of compliance with land use requirements				

	Component	Yes	No	NA	Comments
	a. Acknowledgement that management strategies determined to significantly affect land use are carried out in a manner that complies with the statewide land use goals and are compatible with acknowledged comprehensive plans				
5	Provides any other analyses or information specified in the WQMP				
	Public involvement plan for implementation of strategy Public involvement plan is sufficient. Annual reports and plans must be posted on a publicly accessible website unless a DMA does not have a website, or work with DEQ to make their plans publicly accessible (e.g. copies made at City Hall).	X			In progress
	Fiscal analysis for resources needed to develop, implement, and maintain plan over the next 5 years DMA conducted a fiscal analysis to determine what additional resources are necessary to develop, implement, and maintain the management strategies, and how these resources will be obtained. Generally, this analysis is based over the 5 years of an implementation plan. See fiscal analysis detail in Mercury WQMP on pg. 128 to meet this requirement.	X			Specific amounts in matrix table
	Implementation plan reporting matrix table included Table should include DMA-specific implementation deadlines for all required strategies. This is also an appropriate place to reflect costs/fiscal analysis associated with each strategy or BMP.	X			Pg. 43-45
6	Optional short background piece DMA is encouraged to include background information in the plan that would be useful for public understanding of DMA responsibilities to protect water quality, plan goals, objectives, DMA jurisdictional boundaries, watershed maps, water quality and waterbody beneficial use concerns, etc.	X			Pg. 10-11

Part III: Review Comments

As referenced in the attached letter the city of Molalla's Mercury TMDL Implementation Plan has been approved. Please review the attached comments in the checklist for outstanding items that need to be addressed. These can be submitted with the 5-year TMDL plan update that is due Nov 1, 2023.

Note: POTW information does not need to be included in the TMDL plan.

Part IV: Year Five Review

(Survey Monkey comments, sufficient progress determination, and other discussion items)