

July 9, 2024

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**Subject: City of Lafayette Mercury TMDL Plan
2023 Annual Report – updated for DEQ comments**

This letter report is provided in accordance with the City of Lafayette TMDL Implementation Plan to report on the City’s TMDL related activities for 2023, and for 2022 from September through December. The report is based upon the City TMDL implementation plan which was completed in 2022 and which covers mercury. The items listed below cover the matrix in the implementation plan. Management strategies, required actions and the activity monitoring results are identified below:

Strategy & Action	Description of 2023 Activities and Results Monitoring
<p><u>Strategy</u> - Solicit public input on TMDL implementation plan every 5 years.</p> <p><u>Action</u> – Present the TMDL Plan to City Council and the public.</p>	<p>Information was provided at the community Resources Fair in May of 2023; see attached flyer. The implementation plan was discussed at the November 10, 2022 City Council meeting. The implementation plan is posted on the City web site. https://www.ci.lafayette.or.us/public_works</p>
<p><u>Strategy</u> - Require erosion control for construction sites over 1 acre.</p> <p><u>Action</u> – require DEQ 1200-C erosion control permit for more than 1 acre of soil disturbance; City enforced code requirements for erosion control for smaller projects.</p>	<p>There was a development called Meadowbrook and a 1200-C erosion control permit was required (attached). The City observed the erosion control facilities in place including erosion control fencing and catch basin bags.</p>
<p><u>Strategy</u> - Require erosion control for construction sites under 1 acre.</p> <p><u>Action</u> – Educate city staff about erosion control.</p>	<p>Two city staff members have performed training online. No documentation is currently accessible. Staff will be attending upcoming training and will document attendance.</p> <p>There were no construction projects under 1 acre in the last year.</p>

<p><u>Strategy</u> - Receive and respond to complaints regarding water quality problems (erosion; illicit discharge).</p> <p><u>Action</u> – Enforce nuisance control ordinance; coordinate complaint with code enforcement.</p>	<p>The City has an enforcement officer. When complaints are made, the public works staff respond and work orders are developed. No complaints were received in the last four months of 2022 or in 2023.</p> <p>The process for citizens to make complaints is as follows: contact the City in one of three ways, call city hall, use the GoGOV app, or use the City website and “Contact Us” form. Once the complaint or concern is received, the information is passed to the public works staff via work order.</p>
<p><u>Strategy</u> - Maintain maps of City stormwater and sanitary sewer systems.</p> <p><u>Action</u> – Update existing maps periodically.</p>	<p>The City is working with MWVCOG to update the city maps on a GIS system. It is intended to be updated by the end of 2024.</p>
<p><u>Strategy</u> – Encourage annual public cleanup day.</p> <p><u>Action</u> – Plan and publicize the cleanup day.</p>	<p>The annual clean-up day was in June 2023 at Terry Park. It was publicized on the City web site, on the City leader board, City app., and sent it to the local newspaper (the newspaper did not publish it). City staff (4) assisted during the day as well as volunteers.</p>
<p><u>Strategy</u> – Continue regular sweeping and cleaning of catch basins.</p> <p><u>Action</u> – Street sweeping and catch basin cleaning.</p>	<p>Street sweeping is done every other month by City Sweepers. Invoices for street sweeping are attached.</p> <p>No catch basin cleaning was done in 2023. The City is formulating a plan to perform catch basin cleaning yearly going forward. This includes purchase of a vacuum trailer which was just approved by the City budget committee. The equipment is scheduled to be purchased by the end of July 2024. The plan will require work orders to be developed for weekly cleaning during the fall.</p>
<p><u>Strategy</u> – Keep the citizens posted on steps the City is taking.</p> <p><u>Action</u> – Post the implementation plan, annual and five-year reports on the City web site.</p>	<p>The implementation plan is posted on the City web site. The City will post the annual plan on the web site at the same location once it is approved by the DEQ. https://www.ci.lafayette.or.us/public_works</p> <p>This has not been done yet, but the City plans doing this periodically going forward.</p>

<p><u>Strategy</u> – Provide information concerning sediment and mercury to the citizens.</p> <p><u>Action</u> – Periodically include articles in the City newsletter concerning sediment and mercury.</p>	<p>The City has not done this yet. However, City staff have identified this as an item that will be addressed and have assigned a staff member responsibility for this.</p>
<p><u>Strategy</u> – Research escalating enforcement strategies for construction site run-off.</p> <p><u>Action</u> – Contact other agencies to determine potential procedures.</p>	<p>The City has not done this yet. However, City staff have identified this as an item that will be addressed and have assigned a staff member responsibility for this.</p>
<p><u>Strategy</u> – Research post construction code and design standard implementation.</p> <p><u>Action</u> – Contact other agencies to determine potential procedures.</p>	<p>The City has reviewed design standards for detention and treatment including low impact development methods from Clean Water Services and the City of Portland. The City has also reviewed development codes in Gervais which already has a requirement for detention and treatment, and in Carlton, which is in the process of updating their code to include detention and treatment. The next steps are to review the codes and design standards in depth. At the appropriate time, this will be discussed with the City Council. Eventually, development code and design standard updates will be addressed through the standard public process.</p> <p>Before the standards are developed and implemented, the City will continue to enforce erosion control to address construction site runoff.</p>

Should you have any questions or comments regarding this report, please give either Kyle Jentzsch or myself a call.

Sincerely,
City of Lafayette



Branden Dross
City Administrator