

**MS4 ANNUAL REPORT FOR REPORTING PERIOD
JULY 2018 THROUGH JUNE 2019**

**CITY OF TURNER
(www.cityofturner.org)**

**Prepared by:
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Background

The City of Turner was granted a permit under the State's MS4 program in March 2007. A program of BMP's was approved. The City has worked hard to significantly follow the BMP's and meet its compliance schedule. In 2011, the City submitted a permit renewal plan application. Since then the City has been operating under its existing permit.

Overview

As always, the level of work we were able to complete on our permit BMP's was driven by resources—or the lack there of. In addition, as building has picked up focusing on construction related activity became a larger focus.

The City continues to charge a \$2/month fee on all utility accounts, collecting \$20,000 a year for storm water work. It provides resources to cover part of the City Administrator's work, and resources for street sweeping, catch basin cleaning and some maintenance.

Public Works staff resources have made a comeback as we are now up to 3.25 FTE staff in Public Works, after the years of the downturn where we had only 1.5. This has provided additional resources for storm water maintenance, time to better assess the status of catch basins, and the implementation of BMP's at construction sites.

Permit Activity Narrative

Below is a brief narrative overview of activities categorized under the 6 minimum measures and other general components of the program.

Education & Outreach: We have had some storm water information printed in our utility bill flyers. We continue to have information on our web site. With 2 significant subdivisions in construction and under review we have had direct meetings with both developers and site builders particularly about erosion control. (See activity log.)

IDDE: An illegal hose connection to a catch basin was reported to the city on April 1st. It was from a local food cart and was disconnected immediately. On May 15th, there was a fuel or oil like sheen that had been tracked onto the road. There was no evidence to determine where this started or ended. A quick shower then washed it away. (Note: Attached to this annual report is a series of communications between DEQ, the City of Turner, and the Turner Fire District. This was a result of the discharge initiated by the fire district, reported anonymously, and which never entered the City of Turner's regulated municipal storm sewer system.)

Construction: The City continues to see a large number of building permits, particularly associated with the large development at the former gravel mine in town. This has led to much more monitoring of state issued 1200 C permits, and through this monitoring identifying of violations and tracking of response. Please refer to more detail in the ACTIVITY TRACKING LOG.

Post-Construction: The city does not have post-construction LID standards at this time. However, we do have one LID designed project in place, which is Delaney Road. The city did extensive bio infiltration swale maintenance this year with assistance from Marion County, weeded and replanted where necessary. The newly constructed Westwood subdivision was reviewed and approved with a large bio infiltration basin for detention. There been numerous inspections and replanting efforts to increase the stabilization of the slopes. The discharge into the basin has been redesigned so it does not contribute to erosion issues. Additional plantings are scheduled for this fall.

Municipal Operations: the city did not meet its traditional level of activity with street sweeping and catch basin cleaning. In March of this year our 20 year public works director retired, which created a position shift for every single employee in the department. At the same time due to a complex land trade for commercial development, the city was constructing and moving to its new public works facility, again, as every employee is shifting their job responsibilities. Finally, it's been more and more difficult to use Marion County Public Works Department facilities to sweep our streets. We have recently contracted with a private company from Keizer that can allow supplemental sweeping when, as during the summer construction season, the county is just unavailable to supply services. We hope to catch up on storm water catch basin cleaning this fall, once the public works facility move is complete.

Monitoring/Inspection/Enforcement

Please see the activity tracking log, and color-coded items that relate to enforcement. It's

Schedule B—Annual Report Requirements

A) The status of compliance with permit conditions.....

We don't not meet all of our BMP's. This is largely due to a lack of resources. We focus on core concern activities— with the large subdivisions that have been

approved a lot of that focuses on erosion control—and move forward in other areas as we can.

....an assessment of the appropriateness of the identified BMP's.....

Direct pollution control and elimination activities remain valuable BMP's. General education/ outreach has no real visible impact since the general public has no nexus with sediment generating activity. We focus on conversations with developers. Since almost no IDDE activity ever happens, these BMP's seem a distraction of our resources.

....progress towards achieving the statutory goals of reducing the discharge of pollutants to the MEP and the measurable goals for each of the minimum control measures.

To the degree we can reasonably determine MEP, however, we are doing well. A significant enhancement to our temperature monitoring, is the fact that much of Turner stormwater discharge now goes into a 70 acre lake which certainly acts as a heat sink, before that body empties into Mill Creek, certified salmon habitat.

As I note every year, I remain concerned, as the following pictures show, that any activity that the city does relative to reducing stormwater pollutants, is thoroughly and completely flooded by the brown sludge that enters the city, a result of the large farming area outside the city limits.

Upstream of Permit Area



Downstream of Permit Area



B) Results of information collected and analyzed, if any, during the reporting period, including evaluation criteria used to assess the success of the program at reducing the discharge of pollutants to the MEP.

We now have three years of temperature data recorded on a daily basis at the stream gauge in the center of town. Although this is a blip in terms of climate issues, we have seen steady increases in temperature year after year. This is certainly

concerning, however, it more reflects the problems of a lack of regulation in the agricultural lands upstream of Turner than anything that Turner can have a direct impact on.

C) A summary of the storm water activities the permittee plans to undertake during the next reporting cycle, including a schedule for implementation

With the legal conflict between the city of Turner and DEQ, there is no intention at this time for significant changes in the program.

As the large management staff changes at Marion County finally settles in, we hope to reengage their staff with some clearer documentation regarding responsibilities for stormwater collection and discharge in the city of Turner.

D) A description of changes to the SWMP, including changes to BMP's or measurable goals identified in the SWMP

None identified for this report.

E) Information on all new additions or removals of annexed areas that result in an expansion or contraction of the MS4's boundaries

None for this report.

F) Notice that the permittee is relying on another government entity to satisfy some of the permittee's permit obligations

N/A

G) Number and nature of enforcement actions

Please refer to the tracking activity log for details. The City tracked inspected and found 7 separate BMP violations during the cycle. All were corrected and none required additional enforcement action.

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.

David Sawyer, City Administrator

Date