

Waterbody Name	Kellogg Creek
Sub Basin Name	LOWER WILLAMETTE
HUC	17090012
LLID	1226466454405
River Mile	0 to 5
Parameter	E Coli
Criteria	126 organisms per 100ml, no single sample > 406
Season	October 1 - May 31
Listing Status	303(d) List
Supporting Data	LASAR 25529 RM 2.6: 6/10 samples > 406; LASAR 25528 RM 3.6: 2/5 samples > 406.
Sample Matrix Description	Water Column
List Date	2002
Beneficial Uses	water contact recreation

The IER requirement for 303(d) Listed Pollutants is¹⁸:

303(d) Listed Pollutants:

The requirements of this section apply to receiving waters without established TMDL wasteload allocations. The co-permittee must qualitatively review the pollutants that are on the 2002 303(d) list that are relevant to the co-permittee's MS4 discharges. This review and corresponding summary of proposed actions must be incorporated into the Permit Renewal Application. The review and summary must accomplish the following:

- i) Determine whether there is a reasonable likelihood for storm water from the MS4 to cause or contribute to water quality degradation of receiving waters through the discharge of pollutants on the 2002 303(d) list. Provide the rationale for the conclusion, including the results of an evaluation.
- ii) If the discharges from the MS4 is a contributor to specific listed pollutants, determine and describe the relationship between the 303(d) listed pollutant and the MS4 discharges.
- iii) Determine whether the BMPs in the existing SWMP are effective to address the 303(d) pollutants. If not, describe how the plan could be adapted to more appropriately address these pollutants. A summary of the rationale for this determination must also be included in the report.

The only parameter listed on the DEQ website for Kellogg Creek is E. coli. Typically, this is expected to be controlled only for anthropogenic (human) sources, not animal. Nonetheless, it can be determined that there is not a reasonable likelihood for stormwater from the Johnson City MS4 to cause or contribute to water quality degradation of Kellogg Creek for E. coli. The reasoning is there are no known cross-connections, seepage, or other discharges of human waste. As for potential animal sources, pet waste is requested to be collected and disposed of properly. The lake is posted with a "Do Not Feed Ducks", which is enforced on all residents. Bacteria is prevalent for all land uses and all areas. MS4 discharges can contribute to elevated bacteria levels in receiving waters. However, the relative contribution of bacteria from different sources is difficult to determine. Multiple studies over the past decade have revealed that only a small

¹⁸ Permit No. 101348, Schedule D(2)(e).

percentage of bacteria in ambient waters are actually associated with human sources¹⁹. It can be reasonably concluded that E. coli is controlled to the Maximum Extent Practicable by the City of Johnson City.

7. EXECUTIVE SUMMARY OF STORMWATER MANAGEMENT PLAN

The IER requirement²⁰ is to provide:

An executive summary of the SWMP, not more than 15 pages in length, that describes the main elements of the SWMP.

The City of Johnson City covers about 42 acres and is entirely residential, made up of manufactured and/or mobile homes and structures. There are approximately 283 households. It has no tax base, and all the property is owned by a single owner who is the landlord of all residents. There are virtually no ditches (brick-curbed streets drain to 3 catch basins), no sumps, no flood hazards, no construction. These unique features to this small community means the “maximum extent practicable” standard for reducing pollutants carried in stormwater discharge should be a very low bar. In fact, the City is able to conduct many Best Management Practices (BMPs) to ensure source control and structural control sufficient for a Stormwater Management Plan (SWMP).

Table 7.1, below, pages 13-15, is the Executive Summary/SWMP according to Permit requirements set out in Schedule D(2)(c): SWMP Elements for Permit Renewal Application.

8. MAPS

The IER requirement is to provide²¹:

Maps providing updated information as described in 40 CFR Section 122.26(d)(1)(iii)(B), where applicable.

A USGS 7.5 minute topographic map (or equivalent topographic map with a scale between 1:10,000 and 1:24,000 if cost effective) extending one mile beyond the service boundaries of the municipal storm sewer system covered by the permit application. The following information shall be provided:

- 1. The location of known municipal storm sewer system outfalls discharging to waters of the United States;*
- 2. A description of the land use activities (undeveloped, residential, commercial, agricultural, and industrial uses) accompanied with estimates of population densities and projected growth for a 10-year period within the drainage area served by the separate storm sewer. For each land use type, an estimate of average runoff coefficient shall be provided.*
- 3. The location and description of the activities of the facility of each currently operating or closed municipal landfill or other treatment, storage, or disposal (TSD) facility for municipal waste.*

¹⁹ See more detailed analysis in other Clackamas County co-permittee IER's, e.g. Gladstone, 2006.

²⁰ Permit No. 101348, Schedule B(2)(b)(v).

²¹ Permit No. 101348, Schedule B(2)(b)(vi).

Table 7.1: MS4 NPDES Permit Renewal Application: Johnson City SWMP 2008

Stormwater Management Plan Elements²⁰		
Best Management Practices	Frequency	Performance Indicators
Structural and Source Control BMPs:		
<i>NPDES Permit Requirement - (1) Maintenance activities and a maintenance schedule for structural controls to reduce pollutants (including floatables) in discharges from municipal separate storm sewers.</i>		
BMP JC-1: Inspect and Maintain the Separate Storm Sewer System for Proper Operation	On-going. At least annually.	The City's sewer and stormwater lines, culvert, pipes are maintained by Johnson Mobile Estates. Records are maintained at the City Office.
BMP JC-2: Clean catch basins to prevent pollutants from entering the Storm Sewer System	On-going. At least once/year.	All Catch basins are cleaned at least once/year, including sludge removal, and suctioning of oil/water. Records are kept noting maintenance activities (date cleaned, volume and nature of material removed).
<i>NPDES Permit Requirement - (2) Planning procedures including a comprehensive master plan to develop, implement and enforce controls to reduce the discharge of pollutants from municipal separate storm sewers that receive discharges from areas of new development and significant redevelopment. Such a plan must address controls to reduce pollutants in discharges from municipal separate storm sewers after construction is completed. Controls to reduce pollutants in discharges from municipal separate storm sewers containing construction site runoff are addressed in paragraph Schedule D(2)(c)(iv).</i>		
BMP JC-3: Review New and Redevelopment Plans for Stormwater Components	As needed.	Johnson City does not expect any significant changes in the stormwater system. The city does not expect new or redevelopment to occur under the current land use structure.
<i>NPDES Permit Requirement - (3) Practices for operating and maintaining public streets, roads and highways and procedures for reducing the impact on receiving waters of discharges from municipal storm sewer systems, including pollutants discharged as a result of deicing activities.</i>		
BMP JC-4: Sweep streets on a regular basis to prevent contaminants from entering the Separate Storm Sewer System.	On-going. At least 4 times/year.	Records of days swept as well as weight and volume of materials collected are kept at City

²⁰ From NPDES Permit No. 101348, Schedule D(2)(c); SWMP Elements for Permit Renewal Application.

Table 7.1: MS4 NPDES Permit Renewal Application: Johnson City SWMP 2008

Stormwater Management Plan Elements²⁰		
Best Management Practices	Frequency	Performance Indicators
		Recorder's office.
BMP JC-5: Reduce potential harmful effects on water quality of roadway anti-icing activities and materials by proper sand collection methods and by prohibiting the use of glycol and salt.	JC does not use any anti-icing materials.	Since the City does not use, nor does anyone else apply salt, glycol, or other anti-icing material, this performance is met.
BMP JC-6: Repair streets in a manner that avoids disturbance of the area and schedule repairs during dry periods to minimize runoff.	As needed.	Records of street repairs are kept at City Office.
BMP JC-7: Properly dispose of street waste materials.	As needed.	Street waste materials are disposed in an appropriate off-site manner and location.
NPDES Permit Requirement - (4) <i>Procedures to assure that flood management projects assess the impacts on the water quality of receiving water bodies and that existing structural flood control devices have been evaluated to determine if retrofitting the device to provide additional pollutant removal from storm water is feasible.</i>		
The City of Johnson City is fully developed, does not have any current master plan or proposed capital improvement projects, nor any flood management projects.		
NPDES Permit Requirement - (5) <i>A program to monitor pollutants in runoff from operating or closed municipal landfills or other treatment, storage or disposal facilities for municipal waste. The description must identify priorities and procedures for inspections and establishing and implementing control measures for such discharges (this program can be coordinated with the program developed under Schedule D(2)(c)(iii)).</i>		
The City of Johnson City has no operating or closed municipal landfills within its jurisdiction.		
NPDES Permit Requirement - (6) <i>A program to reduce to the maximum extent practicable, pollutants in discharges from municipal separate storm sewers associated with the application of pesticides, herbicides and fertilizer that will include, as appropriate, controls such as educational activities, permits, certifications and other measures for commercial applicators and distributors, and controls for application in public right-of-ways and at municipal facilities.</i>		
BMP JC-8: Minimize impacts associated with the application of pesticides, herbicides and fertilizers. Avoid waterways and	As needed.	Review amounts purchased/ or private contractor application of fertilizers.

Table 7.1: MS4 NPDES Permit Renewal Application: Johnson City SWMP 2008

Stormwater Management Plan Elements²⁰		
Best Management Practices	Frequency	Performance Indicators
adjacent areas.		
BMPs to Detect and Remove Illicit Discharges and Improper Disposal:		
<i>NPDES Permit Requirement - (1) A program, including inspections, to implement and enforce an ordinance, orders or similar means to prevent illicit discharges to the municipal separate storm sewer system...</i>		
BMP JC-9: Prevent illicit discharges (non-stormwater) to the storm sewer system.	On-going field screening.	Records are kept of any significant findings of improper disposal or illicit discharges found by daily inspection.
BMP JC-10: Ensure procedures to contain and respond to spills that may discharge into the storm sewer system.	On-going.	Records are maintained of any significant activity relating to emergency events and/or spills.

Table 7.1: MS4 NPDES Permit Renewal Application: Johnson City SWMP 2008

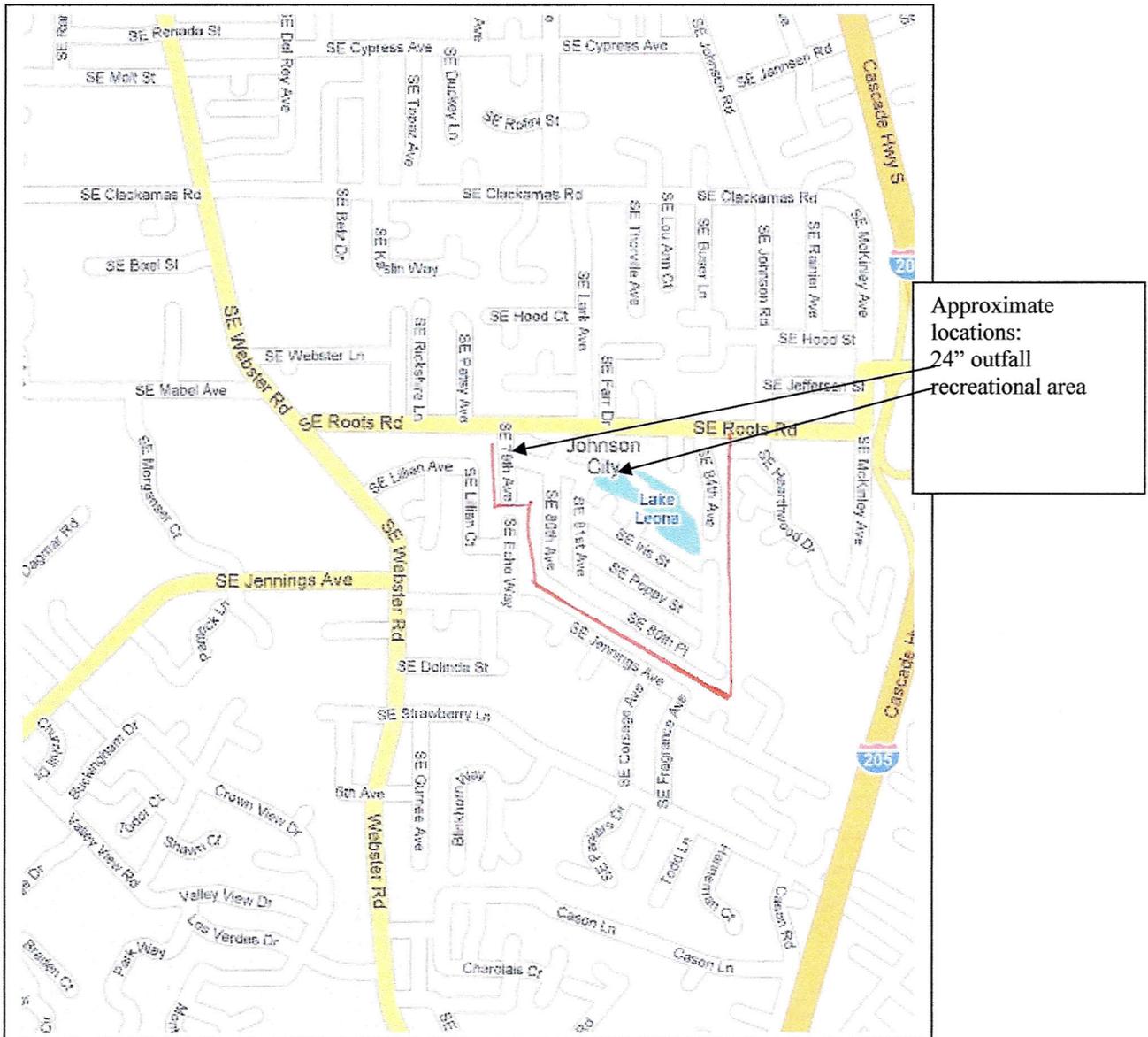
Stormwater Management Plan Elements²⁰		
Best Management Practices	Frequency	Performance Indicators
BMPs to Monitor and Control Discharges from Industrial Facilities:		
<p>NPDES Permit Requirement - (1) <i>A program to monitor and control pollutants in storm water discharges to municipal systems from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA), and industrial facilities that the co-permittee determines are contributing a substantial pollutant loading to the municipal storm sewer system.</i></p>		
The City of Johnson City has no municipal landfills, hazardous waste treatment, disposal and recover facilities, or any other type of industrial activity.		
Construction Site BMPs:		
<p>NPDES Permit Requirement - <i>A program to implement and maintain structural and non-structural best management practices to reduce pollutants in storm water runoff from construction sites to the municipal storm sewer system.</i></p>		
The City of Johnson City has no construction activity. Manufactured structures are placed on top of ground (no basements, etc.) with virtually no disturbance of the land.		
Public Education BMPs:		
<p>NPDES Permit Requirement - (5) <i>- A program to promote, publicize, and facilitate public reporting of the presence of illicit discharges or water quality impacts associated with discharges from municipal separate storm sewers. (6) - Educational activities, public information activities, and other appropriate activities to facilitate the proper management and disposal of used oil and toxic materials.</i></p>		
BMP JC-11: Provide Public Education and Outreach Materials regarding Water Quality and Stormwater Management.	At least once/year.	The monthly City newsletter to all citizens will (at least annually) include appropriate public education elements re: BMPs to protect impacts

²⁰ From NPDES Permit No. 101348, Schedule D(2)(c); SWMP Elements for Permit Renewal Application.

		on the storm sewer system.
<p>BMP JC-12: Promote public involvement activities regarding beneficial impacts to the storm sewer system, including storm drain stenciling, and Clean Up Day.</p>	<p>Once/year.</p>	<p>Records are kept of the participation in Metro's recycling program. The City also sponsors an annual Clean Up Day, with records of volume collected.</p>

4. The location and permit number of any known discharge to the municipal storm sewer that has been issued a NPDES permit.
5. The location of major structural controls for storm sewer discharges (retention basins, detention basins, major infiltration devices, etc.).
6. The identification of publicly owned parks, recreational areas, and other open lands.

Johnson City is of a size that is not easily identified on a topographic map of the required size, thus a street map will provide the required information. If more detailed information is needed, see the Clackamas County NPDES IER.



- 1) One 24" outfall discharges stormwater to Kellogg Creek.
- 2) All land use is residential (exception 2 buildings office-related). Population density at the 2000 census was 4,079.8/km² (11,061.5/mi²). Note: Total population is

approximately 283 households. There is not expected to be any growth in the next ten year period that would impact the storm sewer system.

3) There are no municipal landfill or other treatment, storage, or disposal (TSD) facility for municipal waste.

4) There is no NPDES discharge permit within city boundaries, other than the co-permittee status of the City itself on Permit No. 101348 with Clackamas County and cities within the County.

5) Lake Leona is shown on the above map.

6) There is a very small public park behind the City Office. There is an informal recreational area near the Lake.