

April 12, 2007

Beth Murray, City Recorder
City of Westfir
P.O. Box 296
Westfir, Oregon 97492

RE: TMDL Implementation Plan

Dear Beth:

The Oregon Department of Environmental Quality (DEQ) has reviewed the draft Total Maximum Daily Load (TMDL) implementation plan submitted by the City of Westfir on February 21, 2007. The DEQ appreciates the significant amount of work put into this plan by the City Of Westfir with the assistance of the Lane Council of Governments. We feel that the plan meets the basic intent and the specific requirements for the development of TMDL implementation plans as specified in Oregon Administrative Rules (OAR) and we would like to approve the plan as submitted at this point in time. We do have some comments, however, that we would like to convey to the City of Westfir to be considered as part of an adaptive management framework.

As mentioned previously, the plan submitted by Westfir meets all the requirements as specified in the TMDL Rule (OAR 340-042-0080(3)). Specifically, the submitted plan:

- a) identifies the management strategies to be used to achieve load allocations and reduce pollutant loading
- b) provides a timeline and a schedule for completing measurable milestones
- c) provides for performance monitoring with a plan for periodic review and revision
- d) provides evidence of compliance with applicable statewide land use requirements
- e) and provides other analyses or information as specified in the Water Quality Management Plan (WQMP).

The TMDL Implementation Tracking Matrix submitted by Westfir captures each of the essential elements and should facilitate the annual review and adaptive management processes. We would like to thank the City of Westfir for your willingness to utilize this matrix in the development of your TMDL implementation plan.

As the City of Westfir proceeds with TMDL implementation, we think it would be helpful to consider the following six categories of storm water control measures which may be applicable to your municipality: pollution prevention in municipal operations; public education and outreach on stormwater impacts; public involvement and participation; illicit discharge detection and elimination; construction site stormwater runoff control; and post-construction stormwater management in new development and redevelopment.



We acknowledge that the matrix addresses a number of these categories and some of them may not be particularly relevant given the size of Westfir and the nature of its municipal operations. We feel, however, that it would be useful to keep these basic six categories in mind to ensure that the potential stormwater impacts are being adequately addressed in the specific actions and measures captured in the City's TMDL implementation plan.

We would also like to encourage Westfir to consider some type of fiscal analysis to determine how the City will be able to fund the various activities contained in the matrix. We understand that the City of Westfir has a limited budget and we recognize that in some cases grants and/or loans would be required to allow for the budgeting of water quality improvement projects.

The DEQ would like to reaffirm that we are available to you as a resource to assist you as you move forward with TMDL implementation. We would like to check in with you on an annual basis to assess the TMDL implementation process and the status of the measures and benchmarks contained in your tracking matrix. The matrix component of your TMDL implementation plan was designed with the annual reporting requirements in mind and we believe that it is well-suited for tracking progress over time. We feel that the annual review process will facilitate adaptive management and will help keep the TMDL implementation effort focused on the appropriate water quality issues.

Please feel free to contact me at 541-687-7437 or via e-mail at rubin.jared@deq.state.or.us should you have any questions or concerns related to TMDL implementation. Thank you once again for your effort on the development of Westfir's TMDL Implementation Plan. We look forward to your continued involvement in TMDL implementation efforts in the Middle Fork Willamette Subbasin and to your ongoing commitment to improving water quality conditions.

Sincerely,

Jared G. Rubin
Willamette Basin Coordinator

Cc: Mike Wolf, DEQ
Scott Shine, LCOG