

Pollutant/ Strategy	DEQ Comments / Questions 7-3-2020	City Response 7-31-2020
1.1 Temperature/ Solar Radiation Input	- The 2018 annual report references aerial photos obtained for assessing riparian vegetation. Was that part of the strategy completed yet? - What projects did the WSC implement within the city during the reporting period? How did the city support or help facilitate these efforts?	Yes, the 2018 aerial photos were acquired. WSC did not implement any projects within the City during the reporting period.
1.1 Temperature/ Solar Radiation Input	- The city requested postponing completion of the riparian project strategy to 2025, which is almost half way through the next five year cycle. 2018-2025 is a significant amount of time to meet and discuss potential project ideas with the watershed council. This element of the strategy should be completed by 2023. Funding and implementing a project presents different challenges, so extending the timeline on implementation may make sense, but this decision should be dependent on the progress related to the interim milestones. - The following interim milestones should be completed by 2023 to maintain compliance with plan implementation. - By 2023 complete the following interim steps: § Meet with and develop a priority list of potential riparian projects § Identify whether other partners or stakeholder support is needed in order to complete at least one project on the priority list. § Identify the city's resources available to support implementation of at least one priority project § Identify funding any gaps if exist § Identify options for addressing funding gaps	This timeline sounds reasonable when taken alone, however we must take it together with all of our strategies in the Implementation Plan, and our anticipated increase in staff capacity fell through. The schedules in our Implementation Plan were written when we were about to hire an additional FTE to be shared by Public Works and CEDD. That additional FTE would have been a great boon to staff capacity. But it was struck from the budget in 2019 due to unfavorable budget forecasts, which have only been exacerbated by COVID-19 impacts. Without the funding to get more staff, our capacity is extremely limited so we had to adjust some timelines to what we believe we can manage. Currently effectively zero as staff capacity is maxed out by the volume of permits and land use applications, and we do not have the funding to hire more staff. We need funding to provide staff. Given the current pressures on the City's budget, seeking grant funding is the only option for addressing funding gaps at this time.
2.2 Bacteria/ Stormwater	- The city has requested to postpone the strategy related to gauging public interest/ response to outreach and education until 2023. This is the last year in the current five year cycle, so to ensure progress on this item DEQ recommends achieving the following interim milestones to maintain compliance with the implementation plan. - Write down a list of what you want to measure by gauging public interest/ response by 2021, i.e. a list of questions you'd like to ask the public. § For example, do your community members know where to access water quality information, do they know who to call when there is a water quality concern, are they aware of pet waste stations, etc. - Identify your preferred method for getting feedback from community members by 2022, e.g. survey people when they come into the city office, survey people recreating at a park, etc. - Implement the chosen method in 2023	Ok Ok Ok

2.2 Bacteria/ Stormwater	The city has opted to replace establishment of a leaf pick-up route with a call-in approach, as the call-in approach has resulted in an increase in participation. However, the city also crossed out the language specific to educating the public about the availability of leaf pick-up. Is the city no longer going to advertise the leaf pick-up program?	We will continue to advertise the leaf pickup program using local news, city website, and city social media pages. Advertising includes seasonal start and end dates, call in methods, and instructions on acceptable materials/where to put piles. We crossed out "educate public on collection schedule" because when we wrote that we imagined scheduled pickup routes from certain streets on certain days very much like garbage service. There is no pickup schedule, hence there's no pickup schedule to educate the public on.
3.1 Mercury/ Stormwater	- City Council did not approve a SW fee increase. - How will the city fund a SWMP and capital improvement projects without this fee increase? - Will staff revisit a fee with Council in the future? If so, when? - Outreach and education is key to gaining public and Council support for program sustainability. What type of outreach and education will the city do in order to garner public and Council support for SW resources? - The SW fee increase that Council denied was supposed to help support other SW strategies.	With the existing stormwater rate of \$1/month our stormwater projects are extremely constrained. Most of the stormwater fund pays for a partial FTE in the maintenance crew. Capital projects must be budgeted across multiple fiscal years to save up enough funds. We are currently updating our SDCs with a consulting firm, and anticipate collecting stormwater SDC funds late 2020. SDC funds can be put toward select capital projects and may also partially pay for the SWMP update, although additional funding will still be needed. Staff will request additional stormwater funding in the 21-22 FY Budget process. We originally planned to try again in 2020 but with COVID this is not the right time. We are a federally recognized distressed community with median household income far below the state average. Existing debt service on water and sewer funds has already resulted in a higher than average utility bill compared to neighboring cities. Council is loath to impose additional costs on the ratepayers in a normal year, let alone now. We do not believe this request would gain Council support until the local economy improves. Discussion with our Communications Specialist has identified key topics for public education: - what stormwater services the City provides (ie where the existing stormwater fee goes) - connecting the dots between runoff in town and the ability to recreate in a clean river - how the lack of sufficient stormwater funds limits our ability to provide desired stormwater services and impacts other funds (streets fund, etc) The City will begin posting information about these key topics at least quarterly on the City's social media pages.

	- o What will city staff do differently in order to successfully communicate and gain Council support for a SDC? - o Stormwater Master Plans are used to guide stormwater priorities and capital improvement projects. The city does not yet have a SW plan in place; what tool is the city currently using to identify and implement SW capital improvement projects? - o Please identify the city's proposed timeline for completing a SWMP or alternative approach/ timeline.	We have updated our CIP list to more clearly inform decisionmakers about our stormwater capital needs and will use this more detailed information to support our next rate increase request. We will also include informaion on the same key education topics identified above, particularly how the lack of sufficient stormwater funds impacts other funds. Council will discuss SDCs in Council Work Session in July 2020. The City has a SWMP, but it is very old (1980) and does not adequately provide for modern development issues. The SWMP update is included in our 5-year CIP and is tentatively scheduled for FY 22-23. New SDC revenues anticipated to start in 2020 may partially fund the update but are unlikely to fully pay for the update. Staff will recommend to Council an increase to the Stormwater fund in 21/22 FY Budget process.
4.0 Strategies for all pollutants	· Did Council provide any feedback regarding the 2019 draft annual report that was presented on 5/26/2020? · Are there any updates regarding IDDE code adoption?	No. One councilor asked a clarifying question, and Council thanked staff for presenting the report. This measure is incorporated with the strategy in section 3.1, "Update development standards to protect water quality," which includes measures to update the SWMP and codes. In discussions with our Engineer of Record consultant about engineering project prioritization, it was determined that the SDC fee update is more urgently needed than the stormwater code or master plan update, to increase revenue for stormwater projects. Our SDC fees were last updated in 2005 and do not currently include a stormwater SDC. The SDC update project is in progress and includes a new stormwater SDC. Completion is anticipated in 2020.