

Summary of Activities for Applicable TMDLs

This document provides a summary of the activities completed for compliance with the two (2) Applicable TMDLs listed in Appendix 2 of the Western Washington Phase II permit.

Puyallup Watershed Water Quality Improvement Project (Puyallup River Fecal Coliform TMDL)

Permit-compliance activity:

- *Designate areas discharging via the MS4 to Deer Creek as high priority areas for illicit discharge detection and elimination. Complete IDDE screening for bacteria sources in 100% of these MS4 subbasins by July 31, 2024 and implement the schedules and activities identified in S5. C.5 of the Phase II Permit in response to any illicit discharges found and include all results in annual reports submitted to Ecology*

The 2021 SWMP-outlined activities for TMDL compliance and IDDE Program implementation were carried out as identified throughout this summary and other annual report documents.

The Implementation Plan outlined in the Puyallup River Fecal Coliform TMDL references land near Shaw Road on Deer Creek which was purchased by the City in 2012. After the 2016-determination that the property would be inadequate in size and characteristics to serve a regional stormwater facility, the City continued with efforts on an adjacent parcel to acquire land that would create a larger corridor of continuous city-ownership along Deer Creek. This would support a future stream restoration project to improve wetland function and natural stream channel meandering to reduce localized flooding. As part of that project, the City will monitor fecal coliform counts upstream and downstream of the future project site to determine what water quality improvements the project may provide through the natural stream features intended for the restoration. Acquisition of the property to complete the ownership corridor was completed in 2018. The 30% design for this project is complete. We will be looking for grant funding opportunities in order to fund the remainder of this project.

The City is planning on hiring a consultant to complete the full IDDE screening. This work should start later this year and be completed prior to the date required in the permit condition.

Clarks Creek Fecal Coliform TMDL

Permit-compliance activity:

- *Designate areas discharging via the MS4 to Meeker Creek as high priority areas for illicit discharge detection and elimination. Complete IDDE screening for bacteria sources in 100% of these MS4 subbasins by July 31, 2024 and implement the schedules and activities identified in S5. C.5 of the Phase II Permit in response to any illicit discharges found and include all results in annual reports submitted to Ecology*

The 2021 SWMP-outlined activities for TMDL compliance and IDDE Program implementation were carried out as identified throughout this summary and other annual report documents.

The City has continued previously-initiated activities in addition to those listed above, and outlined in the Clarks Creek TMDL Implementation Plan during 2021 including: pet waste program, riparian plantings and restoration at streamside properties (public and private), management of now-purchased shoreline properties, signage and education and outreach to discourage feeding of waterfowl in DeCoursey Park. We are also working with the Fair to limit the animal waste going to the storm drains by permitting/requiring switch systems that will allow catch basins to drain to the sanitary sewer during fair events.

The City is planning on hiring a consultant to complete the full IDDE screening. This work should start later this year and be completed prior to the date required in the permit condition.

Clarks Creek Sediment and DO TMDL

Permit-compliance activity:

- *The permittee shall operate, inspect and maintain existing water quality improvement projects (WQIPs) that achieve a combined average of 51 tons a year by December 31, 2021. The permittee shall apply the crediting methodologies described in the Retrofit Plan.*
- *The permittee shall operate, inspect and maintain existing water quality improvement projects that all together remove or treat 21.4 MG of stormwater per year based on the October 21, 2003 storm event by December 31, 2021. The permittee shall apply the crediting methodologies described in the Retrofit Plan.*
- *The Permittee shall develop and submit a reporting ledger for the City's Pollutant Load Reduction crediting system by March 31, 2020. This reporting ledger shall quantify annual sediment reduction credits and stormwater volume treated or reduced credits awarded to all operational WQIPs during the first 3 years of implementation.*
- *By April 1, 2021 the Permittee shall submit an update of the Plan that includes the WQIPs proposed for the January 1, 2022 – July 31, 2024 reporting period.*
- *By November 1, 2023 the Permittee shall submit an update of the Plan that includes the WQIPs proposed for the 5 year reporting period beginning August 1, 2024.*
- *The Permittee shall submit a reporting ledger that quantifies annual sediment reduction and stormwater volume treated or reduced credits awarded to all operational projects during the first six years of Plan implementation (2017-2022) by March 2023.*
- *Facilities in need of maintenance that impedes facility function cannot receive credit unless a QAPP and methods for determining % function have been agreed upon.*
- *The Permittee may draft a QAPP that outlines information gathered to calibrate the regenerative air sweeping programs annual calculation of sediment reduction credits. This must be submitted for review and approval prior to July 1, 2020.*
- *The Permittee shall conduct public education and outreach activities that increase awareness among residents of the sources of polluted runoff affecting Clarks Creek and its tributaries.*

The City has created a retrofit plan that identifies WQIPs that achieve the goals mentioned in the permit requirements. This retrofit plan was updated and submitted by March 31, 2021. The City is actively operating and maintaining the facilities in the plan as required in order to receive the credit for the facilities. We are tracking these inspection and maintenance tasks in our asset management software and will be reporting on them yearly as required in a reporting ledger that we have been working with Brown and Caldwell to create. In addition, we have been coordinating with Pierce County to assure that we are presenting the data in a similar format for Ecology's ease of use and review.

As mentioned above in the fecal Coliform Section, along with the identified projects listed in our Retrofit Plan, in coordination with the Pierce Conservation district, we have areas along Clarks Creek, Meeker Creek, and Silver Creek that we have in active habitat restoration. This restoration work, should help shade the creeks once established. These habitat restoration areas provide stewardship opportunities and education and outreach opportunities. For example, in coordination with others, during Pierce County Trails day, we hold a trail walk through these basins that are in or tributary to Clarks Creek basin, as well as hold work parties that allow citizens to learn and actively work to restore the riparian areas.

In 2018 we completed the Upper Clarks Creek Stabilization Project. This project should remove a bulk of the sediment loading from Clarks Creek. We will be inspecting and maintaining this project for years to come to ensure that it is working as designed.

We have been working on a QAPP that outlines information gathered to calibrate the regenerative air sweeping programs annual calculation of sediment reduction credits and this QAPP was submitted to Ecology prior to the July 1, 2020 deadline. The QAPP was approved by Ecology, and we have started sampling in March of 2022.

The Clarks Creek Elodea removal project is still completed annually to help reduce the impacts of Elodea on the creek.

Overall, we are working toward and on our way meet the removal/treatment requirements and deadlines set in the TMDL permit requirements for the Clarks Creek Sediment and DO.