

Water Quality Protection
Surface Water Management
Wastewater Collection & Treatment

MEMORANDUM

TO: WES Advisory Committee

FROM: Ron Wierenga, Assistant Director

Erin Blue, Finance Manager

DATE: August 26, 2022

SUBJECT: Storm System Master Plan – Financial Analysis and Rates Forecast

1. Introduction

WES is in the process of finalizing a Storm System Master Plan that projects surface water capital investments of \$36.9 million over a ten (10) year planning horizon. In addition to these anticipated capital demands, over the same 10-year timeframe, the Plan calls for additional program staffing and enhanced operations and maintenance expenses of \$1.7 million.

To assess the financial implications of the Plan, WES staff completed a revenue requirement analysis and rate forecast for fiscal year (FY) 2023/24 through FY 2032/33 incorporating the Plan's recommendations. This analysis indicated rate increases to WES' monthly surface water service charge of approximately 6.5% per year will be needed to fully fund the capital investments as proposed in the Plan.

2. Background

WES provides surface water services and sets rates in WES' Rates Zone 2 and 3 service areas. Surface water management services in Rate Zone 1 are provided by the Cities of Gladstone, Oregon City, and West Linn; surface water management services in Rate Zone 2A are provided by the Cities of Milwaukie and Johnson City. Each of those cities set their own rates for the services they provide.

The majority of WES' surface water work is centered in Rate Zone 2. The work in Rate Zone 3, which is more rural in nature, is largely programmatic (i.e. education, pollution prevention, water quality monitoring, and permitting) and less focused on infrastructure maintenance and improvement. In terms of scale, for the current FY, total budgeted rate revenues in Rate Zone 2 are \$5.4 million. By comparison, the corresponding budgeted rate revenues for Rate Zone 3 are \$222 thousand. As both the majority of WES' surface water program costs and the Plan's capital costs are for Rate Zone 2, for the purposes of this analysis, only Rate Zone 2's surface water rate was considered.



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3. Revenue Requirements Analysis

A. Approach and Assumptions

The revenue requirements analysis forecasted the total amount of annual rate revenue needed to meet all financial obligations of providing surface water services.

Revenue requirements include operations and maintenance (O&M) costs, capital costs, and debt service, as further defined below.

Operations and Maintenance Costs

WES' surface water operations and maintenance activities are performed to ensure the publicly-owned and operated storm system functions properly and in accordance with regulatory requirements. WES operates under permits and orders of the State of Oregon to comply with state and federal requirements, primarily municipal stormwater and underground injection control permits, and Total Maximum Daily Load water cleanup plans. These requirements are the drivers of the majority of WES' services.

For the WES surface water program, examples of O&M costs include:

- Labor
- Repairs and maintenance
- Supplies
- Other County services
- Professional services

O&M costs were projected for the revenue requirements analysis from current FY budgeted expenses and adjusted based on historical cost trends. The analysis assumed a 6% annual growth in labor costs and annual growth rates from 3 to 4.5% in other O&M cost categories for a combined annual increase in surface water O&M costs of approximately 5%. These adjustment factors are consistent with the projections used in WES' sanitary sewer rate forecasting and long-range financial planning. Increasing O&M costs also reflect ongoing expansion of surface water management services driven by both the continual growth of the storm system with new development, as well as increasing regulatory requirements.

Labor costs account for more than 50% of WES' annual surface water operating expenses. The Plan anticipates additional staffing of 2.5 Full Time Equivalent (FTE) will be needed to deliver the projects and programs over the 10-year planning horizon. The majority of the costs for those new FTE will be capitalized and are included in the Plan's Capital Costs. The remainder of those costs, approximately \$170 thousand per year or 1 FTE, is incorporated into the analysis as an additional O&M cost to provide for administrative and operations staff to implement the Plan. Other than the additional staffing recommended by the Plan, the analysis did not include an increase in employee count.



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Capital Costs

Capital costs, as defined for WES' surface water rates structure, are the resources used to acquire or construct capital assets. Total capital costs, including capitalized labor as detailed in the previous section, are projected at \$36.9 million over the 10-year planning period and comprised of capital improvement project costs of \$21.9 million and programmatic capital costs (e.g., small drainage program, water quality retrofit program, etc.) of approximately \$15 million. Annual capital expenditures are projected to be relatively level over the planning horizon. Programmatic capital costs in the Plan are consistent on an annual basis; year-to-year fluctuations in capital improvement project costs drive overall fluctuations in the Plan's costs, which range from an annual minimum of \$3 million in FY 2023/24 to an annual maximum of approximately \$5.2 million in FY 2032/33.

Debt Service

Debt service includes principal and interest payments on long-term debt used to finance capital projects. The WES surface water program has historically followed a pay-as-you-go funding strategy relative to capital improvements and as a result has no current debt outstanding.

Due to the size of the Plan's recommended 10-year capital improvement plan, this strategy will have to be revisited if the capital plan is to be fully implemented. Financial modeling indicates the Plan's capital costs can be cash-financed for the first five (5) fiscal years. Beginning in FY 2027/28, current resources will not be sufficient to fund the projected capital costs and the shortfalls would then be supplemented with new long term debt proceeds. Between FY 2027/28 and FY 2032/33, borrowing of \$24 million would be needed to fully fund the Plan. Debt financing is conservatively assumed to be at an interest rate of 3.5% and a 25-year term.

Other Assumptions

Other financial planning assumptions incorporated into the analysis included:

Use of Existing Reserves

WES has intentionally built surface water capital reserves over the last several years through annual transfers to the construction fund. Total surface water reserves at the end of FY 2022/23 are projected at \$16.4 million, including: \$3.3 million in the operating fund, \$2.8 million in the System Development Charge (SDC) fund, and \$10.3 million in the construction fund. The majority of these reserves will be used to cash-finance the Plan for the first five years as noted above. This strategy delays the need to issue debt for financing and ensures level, predictable rate increases for the duration of the Plan.

Target Reserve Levels

Consistent with WES' Operating Reserve Policy, as recommended by the WES Advisory Committee, a minimum of 60 days' annual budgeted operating expenses are maintained as a reserve throughout the planning horizon.



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System Development Charges and Contributions

WES manages a separate Surface Water SDC fund in compliance with ORS 223. The resources that are available in this fund are used to pay for scheduled capital improvements that expand the capacity or level of service of the stormwater infrastructure. Under statute, these resources can also be used to support the payment of debt service.

WES' surface water SDC methodology and fee was last reviewed in 1998. As the Plan's 10-year capital improvement plan calls for investment in facilities to serve future growth, a separate analysis of WES' surface water SDC methodology and fee will be needed after the Storm System Master Plan is adopted and the final list of projects is known. For the purpose of the analysis, it was assumed that the current surface water SDC fee of \$233 per Equivalent Service Unit (ESU) will increase by an inflationary adjustment of approximately 2% annually. The analysis also assumed that the existing SDC fund reserves of approximately \$2.8 million will be used to fund a portion of the Plan's projected capital expenditures, as discussed above.

Debt Coverage Requirements

WES' bond covenants require that WES maintain an annual minimum debt service coverage ratio of 1.2:1; this coverage requirement is incorporated into the financial model as a revenue requirement beginning in FY 2027/28 when debt financing is needed to fund the Plan. In practice, WES' coverage requirement is tested against all WES revenues, including sanitary sewer and surface water revenues. Coverage sufficiency for forecasting surface water rates was tested separately from WES' sanitary sewer program to ensure that each program provides sufficient coverage for the debt specific to that program.

Non-Rate Revenues

Non-rate revenues reduce the total revenue requirements that must be collected through rates. Non-rate revenue sources for WES' surface water program include interest earnings, miscellaneous charges such as permit fees, and surface water maintenance contract revenues. For the purposes of this analysis of Rate Zone 2's surface water rates, Rate Zone 3 service charges were also treated as a non-rate revenue.

Other Funding Sources

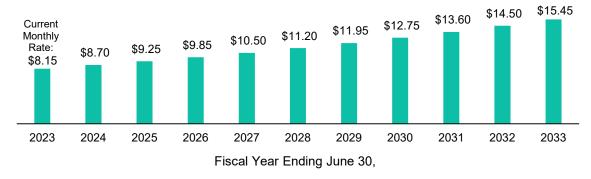
Potential revenue from grants, cost-sharing partnerships, and capital project participation was not considered in the analysis due to the uncertainty of obtaining these sources of funding. WES staff are pursuing these opportunities and any alternate funding received will impact rate projections.

4. Forecasted Rates

Figure 1 on the following page presents a 10-year forecast of the Rate Zone 2 projected monthly rates per equivalent single-family residential customer.

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Figure 1. Projected Rate Zone 2 Monthly Service Charge

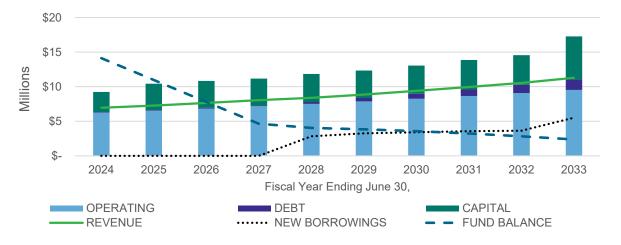


5. Findings and Recommendations

Previous WES Advisory Committee action approved a target range for annual rate increases between a floor determined by an annually-updated inflation index and a ceiling of 10%. Under current planning assumptions, to fully implement the Plan and meet continuing surface water program O&M obligations would require annual rate increases of approximately 6.5% beginning in FY 2023/24. This increase is currently within the target range previously approved by the Committee. Over the 10-year planning horizon, the Rate Zone 2 monthly service charge would increase to \$15.45 per month from the current rate of \$8.15 per month.

Figure 2 below presents the 10-year financial forecast for WES' Surface Water program to fully fund the Plan. Projected FY 2022/23 ending fund balance reserves of approximately \$16.4 million are used to finance the Plan for the first five years with new borrowings beginning in FY 2027/28. Steady annual rate increases of 6.5% are needed to meet revenue requirements.

Figure 2. Surface Water Program Financial Forecast





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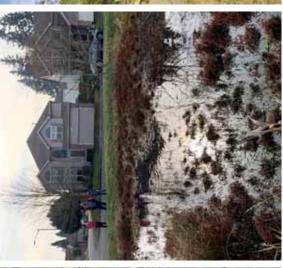
Alternative 20-Year Implementation

Implementing the Plan over a 20-year time frame would reduce the annual rate increases to 5% and delay the need to issue debt until FY 2033/34 as the first 10 years of the Plan could be entirely funded with current construction and SDC fund balances and planned annual rate-funded transfers to the construction fund. Under this alternative, the Rate Zone 2 monthly service charge rate would increase to \$13.25 per month by FY 2032/33, \$2.20 less per month than the increases required to fund the Plan over a 10-year implementation period. It is important to note that minimum 5% annual rate increases are anticipated to keep pace with projected 5% annual increases in operating costs, as detailed above.

Recommendation

WES staff recommends the WES Advisory Committee approve the proposed 6.5% annual rate increases in Rate Zone 2's monthly surface water service charge rate to implement the Plan over 10 years.







WES Storm System Master Plan Update

Ron Wierenga, Assistant Director September 8, 2022



Plan Goals

- Document widespread or urgent system deficiencies
- issues and reduce backlog of system rehab/repair Create operational programs to address existing needs
- Develop a 10-year Capital Improvement Plan for larger more complex projects
- Pleasant Valley/North Carver Comprehensive Plan Identify regional projects to serve growth in the
- Advance policies to guide decision-making



Master Plan Process

Discovery

- Review existing studies, reports, and databases
- Document drainage and maintenance issues known by WES, City of Happy Valley, & Clackamas County staff

Visioning

- Values, priorities & rating system
- Policy recommendations

Solutions

- Group systemic or frequent issues to be addressed through programs
- Rate and rank capital projects
- Develop a CIP, concepts, and costs for capital projects



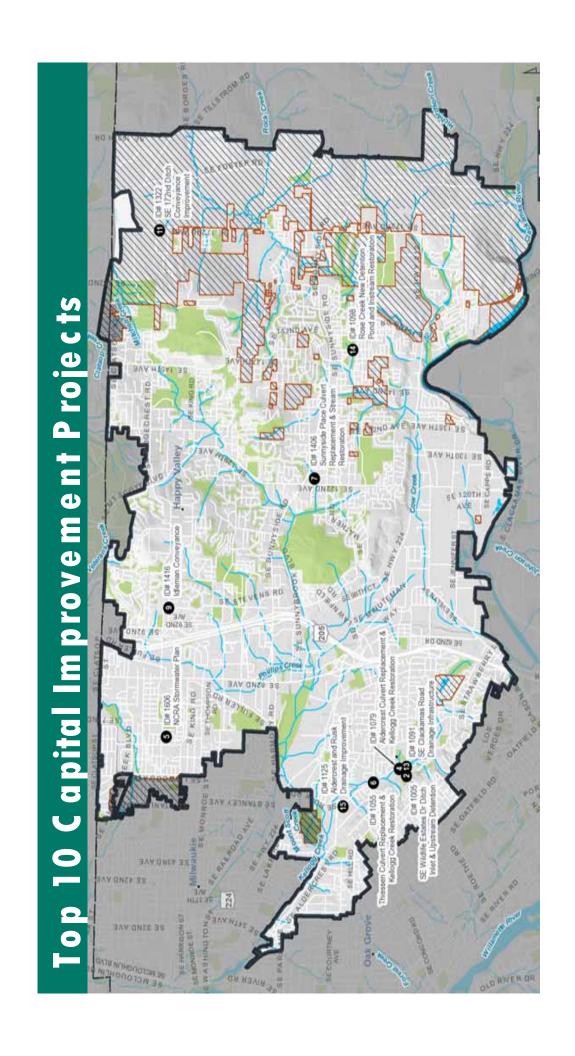
P rograms

- Detention Pond Repair and Rehabilitation
- Water Quality Retrofits
- Small Drainage Projects
- Restoration and Property Acquisition
- **UIC Decommissioning and Retrofits**
- **Priority CIP**

Happy Valley Heights/Highland View Conveyance Project,

Completed 2021





Priority Capital Improvement Projects (CIP)	ts (C	P
Project Name	Score	Cost
3-Creeks Water Quality Project (In Progress)	75	\$3,600,000
SE Wildlife Estates Dr Ditch Inlet & Upstream Detention	57.5	\$1,679,470
Valley View Road Drainage (Storm Costs Only)	22	\$3,277,958
Aldercrest Culvert Replacement & Kellogg Creek Restoration	99	\$1,865,013
NCRA Stormwater Plan (Storm Costs & Storm Implementation Only)	99	\$5,144,850
Thiessen Culvert Replacement & Kellogg Creek Restoration	22	\$801,635
Sunnyside Place Culvert Replacement & Stream Restoration	53	\$573,623
Idleman Conveyance System	51.5	\$1,394,900
SE 172nd Ditch Conveyance Improvement	50.5	\$88,800
SE Clackamas Road Drainage Infrastructure	47.5	\$508,400
Rose Creek New Detention Pond and Instream Restoration	47	\$2,589,010
Aldercrest & Rusk Conveyance System	45.5	\$440,100
Total CIP Cost		\$21,963,759

Annual Program Cost Summary

Program	10-Year Annual Average Cost	15-Year Annual Average Cost
S mall Drainage Projects	\$97,100	\$65,000
Detention Pond Repair/Rehab	\$411,000	\$411,000
Water Quality Retrofits	\$172,000	\$115,000
Restoration & Property Acquisition	\$823,000	\$823,000
UIC Decommissioning and Retrofits	\$53,000	\$35,000
Priority Capital Projects	\$2,196,000	\$1,464,000
Emergency Repairs	\$100,000	\$100,000
Total Annual Program Costs	\$3,852,000	\$3,013,000
Estimated Staff Needs (FTE)	4.6	2.8



Financial Analysis

Surface Water Program Revenue Requirements Analysis

- Rate revenue needed to meet all operating, capital and debt service needs
- Forecast over 10-year planning horizon

Objectives

- Stable, predictable rates
- Fair and equitable full cost recovery
- Revenue stability



Financial Analysis - Projections

Surface Water Operations and Maintenance Costs

- Assumptions consistent with projections used in sanitary sewer longrange financial planning
- 6% annual growth in labor costs; ~54.4% of the Operating Budget in FY 2022/23
- 3 4.5% annual growth in other O&M cost categories
- Combined annual O&M increase of 5%
- Costs include 1 additional FTE for administrative/operations staff



Financial Analysis — Projections, cont.

Capital Costs

- \$36.9 million over 10-year planning period
- Relatively level annual spending
- Programmatic capital costs level on an annual basis, some fluctuation in capital improvement cost spending

Debt Service

- No debt currently outstanding for WES' Surface Water program
- \$24 million in debt financing needed beginning in FY 2027/28



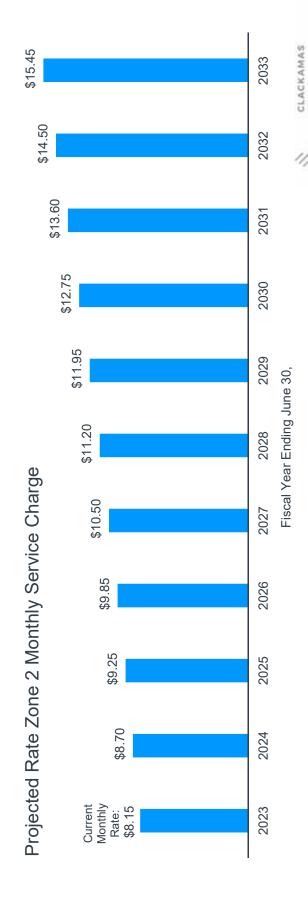
Financial Analysis — Projections, cont.

- Use of existing reserves
- Intentionally built reserves over last several years
- Projected at \$16.4 million at the end of the current FY
- Target operating reserve level
- System Development Charges (SDCs)
- Inflationary adjustment only; separate methodology and fee analysis needed
- Debt coverage requirements
- Required coverage ratio of 1.2:1; tested separately from sewer program coverage
- Non-rate revenues
- Other funding sources



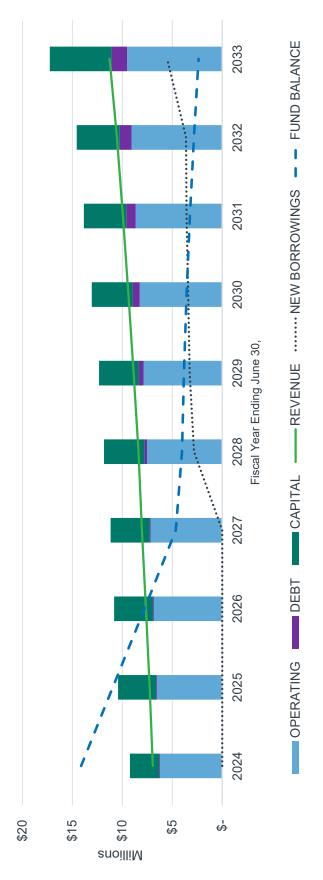
Forecasted Rates

6.5% annual rate increases needed to fund Plan in 10 years



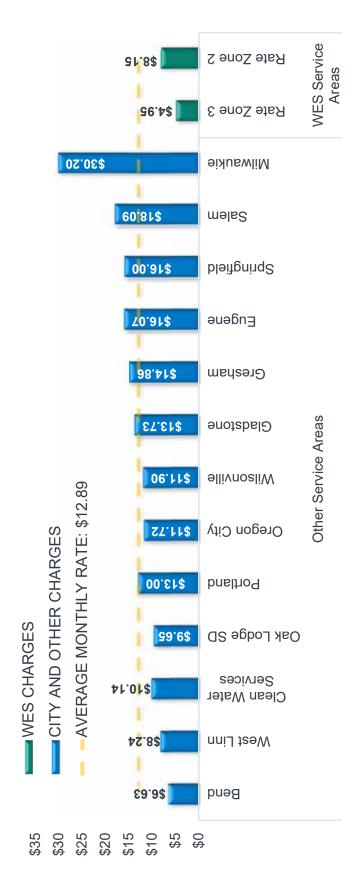
WATER ENVIRONMENT SERVICES 12

Long-range Financial Forecast





Monthly Surface Water Rate Survey, FY 2022-23

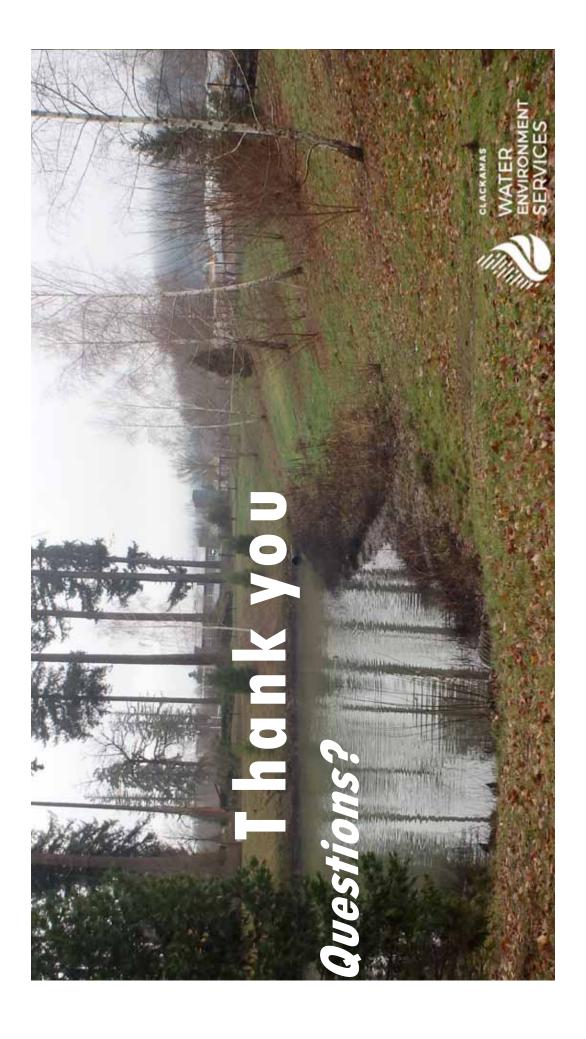




Recommendation

Commissioners, acting as the governing body of Water Environment The WES Advisory Committee recommends to the Board of County Services, approval of the storm system master plan and financial strategy, as presented.









Clackamas Water Environment Services (WES)

Storm System Master Plan (SSMP)

Final

Submitted to:

Clackamas WES 150 Beavercreek Road, Suite 430 Oregon City, OR 97045 Prepared by:

Otak, Inc. 700 Washington Street, Suite 500 Vancouver, WA 98660

August 2022 Project No. 19109

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APPENDICES

Appendices provided in a separate document.

Appendix A	Technical Memorandum: Preliminary Soil Infiltration Characterization – Clackamas County WES Storm System Master Plan
Appendix B	Study Area Detail Maps
Appendix C	WES Stormwater Master Plan Model Review
Appendix D	WES and Happy Valley Storm System Master Plan Review of Existing Data
Appendix E	Known Issues Atlas
Appendix F	CIP Rating Criteria
Appendix G	CIP Project Fact Sheet
Appendix H	Stormwater Tool Kit Factsheets
Appendix I	Program Factsheets

Appendix J Appendix K

Policy and Planning White Papers Pleasant Valley/North Carver Stormwater Infrastructure Plan

Section 1. Introduction

Clackamas Water Environment Services (WES) provides sanitary sewer and stormwater sewer services for more than 190,000 people living and working in Clackamas County. WES treats wastewater to release clean water into the region's waterways and manages and protects surface water runoff to protect water quality in those same waterways. WES is an intergovernmental partnership between Clackamas County Service District No. 1 (CCSD1), the Surface Water Management Agency of Clackamas County (SWMACC), and Tri-City Service District (TCSD). The Clackamas County Board of Commissioners serves as the governing body. WES provides services in three service areas, which are described in the WES Service Area Overview.

WES identified developing a master plan as a strategic initiative supporting Clackamas County's Performance Clackamas goals. The purpose of the SSMP is to create a framework for infrastructure maintenance and expansion to improve the quality of surface water in the WES service areas. The SSMP goals are to address system deficiencies, accommodate new growth, extend the service lives of existing assets, and improve water quality protection. The SSMP provides short- and medium-term recommendations for capital improvements and long-term guidance in evaluating the storm system.

The planning area included in this SSMP consists of 23,913 acres of incorporated and unincorporated Clackamas County.

Planning Process Overview

The SSMP planning process encompassed several steps with the goal of identifying system improvement priorities and developing program recommendations and CIP projects to address those priorities.

Section 2 describes the planning area. The planning area is divided into ten study areas to organize the process and recommendations. The study areas were determined using a combination of topography and built features. Section 2 describes the study areas and their primary water bodies, land cover characteristics, and storm systems in detail.

Sections 3 describes the process of identifying and categorizing known issues, then developing solutions and projects to implement those solutions. Known issues were compiled by reviewing project lists and drainage hotspots as well as interviewing staff from WES, Clackamas County Department of Transportation and Development (DTD), and City of Happy Valley. Capital Improvement Program (CIP) projects and five programs of smaller projects were developed to meet WES's goals.

Section 4 presents the CIP project selection process and the recommended projects. Ten projects were selected to develop into CIP projects with concept level designs and cost estimates.

Section 5 presents recommendations for five programs to systematically improve elements of the storm and surface water systems. Each program groups similar types of projects that would be too small or otherwise ineligible to become a standalone CIP project.

The SSMP process also included drafting three white papers to explore potential policy initiatives including regional stormwater facilities, identification of areas not adequately served by the service areas' storm system, and stormwater credit banking. These papers are presented in the policy discussion in Section 6.

Lastly, a ten-year capital budget and implementation plan for capital improvements is presented in Section 7. The implementation plan describes how WES can strategically and realistically overcome major conveyance and flooding challenges, while also addressing smaller but critical upgrades and repairs over the next ten years.

Regulatory Considerations

Generally, stormwater discharges are known to create adverse impacts on streams, rivers, and lakes in a variety of ways including short-term changes in water quality associated with runoff from storms, long-term changes in water quality resulting from cumulative impact of pollutant discharges over time from many sources, and habitat-altering physical changes such as erosion, sedimentation, and scour resulting from changes to the volume, frequency, and duration of stream flows (United States Environmental Protection Agency, 1999). Thus, the WES storm system and stormwater discharges to natural resources are regulated by a variety of federal, state, and local laws, rules, and guidelines designed to mitigate these impacts.

Federal

Clean Water Act

National Pollutant Discharge Elimination System

The Federal Clean Water Act of 1972 (CWA) created the National Pollutant Discharge Elimination System (NPDES) permit program to address sources of pollution in rivers, creeks, and streams. The program required all municipalities with populations greater than 100,000 to apply for and obtain a municipal NPDES permit for storm systems that discharge to rivers, streams, and other surface water bodies. In Oregon, these permits are administered by the Oregon Department of Environmental Quality (DEQ).

WES is a permittee of the Clackamas County Group Phase I Permit. WES is the MS4 permittee for the unincorporated urban area in Clackamas County and provides stormwater services in the City of Happy Valley and the City of Rivergrove. The permitted area ultimately drains to the Willamette River through numerous stream systems, the Clackamas River, and the Tualatin River. WES's permit involves unique challenges because the urbanized area of Clackamas County falls under several local jurisdictions. The current permit became effective in 2021 and will expire in 2025. New permits are issued for five-year periods.

The MS4 permit guides many of WES's stormwater management program's goals, policies, and day-to-day operations, and permit compliance represents a significant investment for WES.

Total Maximum Daily Load (TMDL)

The CWA describes a program of Total Maximum Daily Loads (TMDLs) to protect water quality when other measures have failed. A TMDL establishes the limit of each pollutant that can be discharged to a water body in order for the water body to achieve or maintain water quality standards.

Under the CWA, DEQ is responsible for identifying waters that do not meet water quality standards (known as the 303(d) list). Water quality standards are intended to protect human health, aquatic life, and uses of waters for fishing, swimming, and other activities. DEQ is also responsible for calculating the allowable pollutant loads and developing water quality management plans, which allocate pollutant limits among dischargers and describe how a TMDL will be implemented.

Clackamas WES participates in three established TMDL Implementation Plans as a Designated Management Agency (DMA) for the parameters listed below.

- Willamette River Watershed TMDL Implementation Plan for Clackamas County, CCSD#1, and Happy Valley (Water Environment Services, 2011)
 - E. coli
 - DDT and Dieldrin

- Mercury
- Temperature
- Cold Water Refugia (CWR)
- Tualatin River Watershed TMDL Implementation Plan for SWMACC and the City of Rivergrove (Water Environment Services, 2014)
 - E. coli
 - pH and Chlorophyll A (Total Phosphorus)
 - Mercury
 - Temperature
 - Dissolved Oxygen
- Sandy River Watershed TMDL Implementation Plan for Clackamas County and CCSD#1 (DRAFT) (Brown and Caldwell, 2008)
 - Temperature
 - E. Coli

In addition, the EPA established the Willamette Basin Mercury TMDL in December 2019 and reissued the TMDL in February 2021. EPA's TMDL incorporates the 2019 DEQ TMDL with major revisions to some load and wasteload allocations to meet the mercury water quality standards. Clackamas WES continues to be a DMA in this new TMDL. (Oregon Department of Environmental Quality, 2019)

Safe Drinking Water Act

The federal Safe Drinking Water Act regulates the injection of stormwater into the ground in order to protect the quality of aquifers used for drinking water. In Oregon, DEQ is authorized to regulate stormwater underground injection controls (UICs), which are deep injection wells that discharge stormwater directly to groundwater. WES operates a small number of regulated municipal UICs.

Endangered Species Act

The 1973 federal Endangered Species Act (ESA) protects threatened and endangered species and their habitats. Steelhead were listed as threatened under the ESA in 1998 (in the Lower Columbia River); Chinook Salmon were listed as threatened in 1999 (in the Lower Columbia River), Coho Salmon were listed as threatened in 2005 (in the Lower Columbia River), and Chum Salmon were listed as threatened in 1999 (in the Columbia River).

The West Coast Region of National Oceanic and Atmospheric Administration (NOAA) and the US Fish & Wildlife Service (USFWS) implement the ESA in Oregon by prohibiting the kill, capture, or harm of threatened and endangered aquatic species. Habitat modifications that injure fish by significantly impairing essential behavioral patterns such as feeding, migrating, and spawning are included in the definition of "harm."

Both the discharge of pollutants from the municipal storm sewer and alterations to hydrology, such as addition of impervious surfaces that change the volume and timing of stormwater runoff (hydromodification), can impair fish habitat.

The ESA could influence some of the requirements for WES's stormwater projects as described in this SSMP. A project which discharges to a water of the state below the ordinary high water mark or creates a fill in a jurisdictional wetland or water of the state could be required to meet more stringent stormwater control standards under a program administered by the U.S. Army Corps of Engineers (USACE) called Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Improvement of Stormwater, Transportation, and Utility Actions Authorized or Carried Out by the U.S. Army Corps of Engineers in Oregon (SLOPES). If a project triggers review by the USACE, then SLOPES standards for detaining and treating stormwater runoff will apply to the project. Depending on the size of

the project and the target protection level of the receiving water, the SLOPES requirements could be more rigorous than the analogous WES standard. (United States Army Corps of Engineers, 2014).

State

Statewide Planning Goals

Oregon Administrative Rules 660 Division 15 establishes several Statewide Land Use Planning Goals. Goal 5 describes the protection of natural resources, including wetlands and riparian corridors. Statewide Planning Goal 6 describes the protection of air, water quality, and land resources quality, and Goal 7 describes protection of areas subject to natural disasters and hazards. Goal 11 describes the steps needed to plan utility infrastructure along with the growth of development (Oregon Department of Land Conservation and Development, 2019).

Local

Comprehensive Plans

Clackamas County Comprehensive Plan

The Clackamas County Comprehensive Plan includes goals and policies to manage growth in urban areas and protect landscapes, rivers, and other natural attractions. The plan's natural resources and energy chapter adopts goals and policies to address rivers and stream corridors in general, five individual river corridors, wetlands, and groundwater. The plan's public facilities and services chapter adopts specific policies for the development of storm drainage infrastructure to address water quality and erosion as well as infrastructure expansion and improvement. (Clackamas County, 2020)

Happy Valley Comprehensive Plan

The Happy Valley Comprehensive Plan includes goals and polices to manage stormwater to protect hydrology and water quality. The plan includes policies that focus on East Happy Valley as the area transitions to an urban area. The plan affirms the high value residents place on the natural qualities of the region and the importance of wise use and management of natural resources. (City of Happy Valley, 2017)

Pleasant Valley/North Carver Comprehensive Plan

The Pleasant Valley/North Carver (PVNC) area was recently brought into Happy Valley's urban growth boundary. By state law, a community Comprehensive Plan for the area must be completed before redevelopment of the area can occur. The PVNC Comprehensive Plan is in progress. As part of the SSMP a stormwater infrastructure plan was developed for the PVNC area. (City of Happy Valley, 2021)

WES Rules and Stormwater Standards

Clackamas WES is in the process of updating its Sanitary and Stormwater Rules and Standards. This project was initiated to review existing rules and standards and recommend updates to reflect new technologies, approaches, and development patterns; address regulatory changes and requirements; and provide uniform and streamlined development review and approval processes across WES's service area. A draft of the revised Rules and Standards was published in December 2021, and the final Rules and Standards are planned for adoption in 2022.

The stormwater related objectives of these Rules and Regulations are:

- To prevent or minimize the introduction of pollutants to waters of the state.
- To meet federal National Pollutant Discharge Elimination System (NPDES) permit requirements.
- To establish policies that prevent future pollution and erosion through implementation of best management practices.
- To provide for the fair distribution of the costs of the surface water management program.
- To better manage and control surface water.

- To protect the health of stream habitats.
- To protect watershed health.

The Stormwater Standards are intended to provide guidance for the reduction of pollutants in stormwater to the maximum extent practicable. These standards also address flow control, water quality, storm drainage system design, erosion prevention and sediment control, source control for pollutant activities, and operations and maintenance. (Water Environment Services, 2021)

Zoning and Development Codes

Each CIP in this plan will need to comply with the local zoning, land development, flood plain and other codes regulating development in the local jurisdictions where it is being constructed. This plan includes the jurisdictions of Clackamas County, Happy Valley and Rivergrove.

Stormwater Planning History

In 1995, DEQ issued the Clackamas County Phase I Municipal Separate Storm Sewer (MS4) permit (Clackamas Group NPDES Permit) to fourteen co-permittees in Clackamas County. Individually, none of these co-permittees met the threshold population of 100,000; however, their combined populations in close proximity did exceed 100,000. The primary goal of the Clackamas Group NPDES Permit is to ensure treatment or removal of pollutants and floatables from stormwater runoff before discharge into a waterway. Five MS4 permit co-permittees have implemented a coordinated Clackamas County MS4 permit program since the 1995: CCSD1, SWMACC, the cities of Rivergrove and Happy Valley, and Clackamas County. WES implemented the permit on behalf of CCSD1 and SWMACC.

The MS4 permit was renewed on several occasions. In 2017, WES published the 2017 *MS4 Permit Shared Stormwater Management Plan for Clackamas County, Clackamas County Service District No. 1, Surface Water Management Agency of Clackamas County, City of Happy Valley, and City of Rivergrove (Shared SWMP) in anticipation of permit renewal later in 2017. However, the permit renewal was delayed until 2021, so WES continued to implement its previous SWMP. When CCSD1 and SWMACC were declared a legal partnership with WES, they no longer needed to be named as separate entities in the list of co-permittees, so the 2021 Clackamas Group NPDES Permit is now issued to: Clackamas County, City of Happy Valley, City of Lake Oswego, City of Oregon City, City of West Linn, Oak Lodge Water Services District, City of Gladstone, City of Johnson City, City of Milwaukie, City of Rivergrove, City of Wilsonville, and Water Environment Services. WES will review and update the SWMP in 2022 as a result of the 2021 Permit.*

In 2005, WES prepared a draft Stormwater Management Program Master Plan covering CCSD1. The plan was not adopted; however, following the draft plan recommendations, watershed action plans were developed for the Kellogg Creek-Mount Scott Creek and Rock Creek basins in 2009. The watershed action planning approach included structural, non-structural, and water resource restorative actions that WES and agencies could take to improve watershed health. (Shaun Pigott Associates, LLC, 2006)

The Pleasant Valley/North Carver (PVNC) area was brought into the Portland Metro Urban Growth Boundary (UGB) for future expansion of Happy Valley city limits. The area is part of the Rock Creek study area directly east of Happy Valley. The PVNC Comprehensive Plan is expected to be adopted in 2022 and will include land use, transportation, and stormwater infrastructure planning. Developing a stormwater infrastructure plan for the area was included in this SSMP process.

WES Service Area Overview

WES is an independent municipal corporation authorized to provide specific services within its boundaries in Clackamas County. WES was created in 2016 as an intergovernmental partnership between CCSD1 and TCSD. In 2017, the SWMACC joined the partnership, and WES began providing surface water management services to the City of Rivergrove and portions of unincorporated Clackamas County

draining to the Tualatin River formerly provided by SWMACC. In 2018, WES began providing surface water management services within the City of Happy Valley and unincorporated Clackamas County previously provided by CCSD1. WES is managed by the County Department of the same name, and the Clackamas County Board of County Commissioners is the governing body of WES. (Water Environment Services, 2019)

WES is organized into three service areas that correspond to the areas of the former service districts.

Service Area #1 is the area formerly served by TCSD. Service Area #2 is the area formerly served by CCSD1. Service Area #3 is the area formerly served by SWMACC. The SSMP planning area includes WES Service Area #2, excluding the areas in Boring, Hoodland, and Fischer's Forest Park, and WES Service Area #3, as well as specified adjacent planned growth areas. Service Area #1 is not included in the SSMP because WES only provides wastewater services in this area. The planning area for the SSMP is non-contiguous and varies in system characteristics. Table 1 shows the services WES provides in each service area. The planning area is covered in more detail in Section 2.

The WES service areas encompass 60 square miles, of which Service Areas #2 and #3 are 40 square miles. This area includes the City of Happy Valley and small portions of other cities as well as 6,500 acres of unincorporated Clackamas County.

Table 1 Service Areas

Service Area	Area (Square Miles)	Agency	Services Provided
Service Area #1	20	Tri-Cities Service District	Wastewater
Service Area #2	25	Clackamas County Service District 1	Wastewater, surface water and stormwater management
Service Area #3	15	Stormwater Management Agency of Clackamas County	Surface water and stormwater management

Storm System Overview

The surface water infrastructure is a separate storm sewer system, meaning stormwater runoff is collected and conveyed separately from sanitary sewerage. Over 10,000 catch basins and inlets collect stormwater from roads and private property. The collected water is conveyed through a network of approximately 308 miles of storm sewer mains (pipes) and nine miles of ditches to discharge to natural water bodies or to the ground. Of the 308 miles of pipe, 90 miles are concrete, 41 miles are polyethylene, 100 miles are polyvinyl chloride, and 68 miles are of unknown material. The remaining eight miles of pipe are variously of cast iron, corrugated metal, ductile iron, reinforced concrete, steel or other materials.

WES manages 893 detention pipes and facilities. Runoff from large precipitation events collects in these facilities and discharges slowly into water bodies. By quickly filling with runoff and slowing the released runoff, these facilities prevent both flooding of nearby neighborhoods and flooding and erosion in the water bodies they drain into. WES also manages 620 vegetated water quality (treatment) facilities although much of the water collected by WES's storm system is conveyed and discharged without treatment.

Collected runoff enters water bodies through 584 outfalls which must be inspected for signs of erosion and illicit discharges of pollutants. Runoff also enters the ground through 370 underground injection

control (UIC) devices. These devices infiltrate surface runoff to the groundwater where it either flows to waterbodies or enters aquifers. These also must be inspected and maintained to prevent contamination and to remove sediment and trash.

WES is responsible for complying with state and federal water quality regulations which require that the public surface water system be adequately inspected, maintained, and repaired.

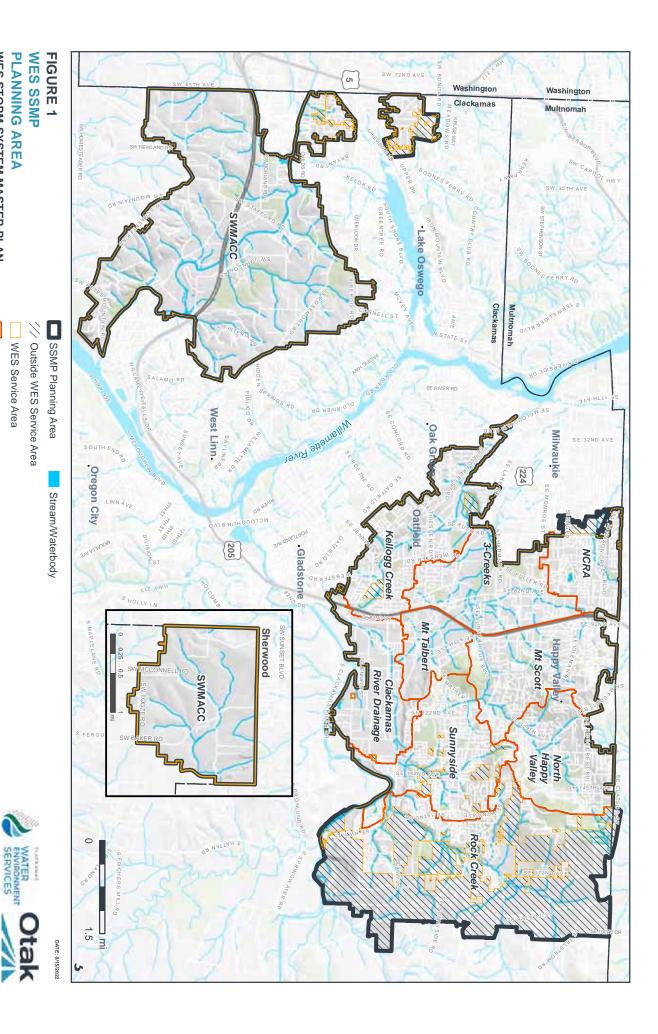
WES Surface Water Program

WES's current Surface Water Program works to protect surface water and groundwater resources from storm runoff and non-point sources and to coordinate compliance with state and federal water pollution laws and cleanup plans. Primary responsibilities of this program includes planning and building stormwater control facilities and capital improvements, monitoring stormwater runoff and streams, implementing public education and outreach campaigns, developing and enforcing water quality regulations, coordinating with municipalities and other agencies, and maintaining the public storm sewer systems within the WES service area.

As the population served by WES continues to increase, WES is committed to responsible stormwater management to keep waterways clean for people, fish, and wildlife. Unfortunately, many past drainage and stormwater management practices and regulations have proven inadequate to prevent stormwater runoff impacts to streams and groundwater, and thousands of developed acres in Clackamas County currently contribute to problems in local water bodies. The SSMP provides short- and medium-term recommendations for system maintenance and capital improvements and long-term guidance in evaluating storm system needs and to achieve WES's vision to be a collaborative partner in building a resilient clean water future where all people benefit and rivers thrive.

Section 2. SSMP Planning Area

The planning area included in this SSMP consists of 23,913 acres of Clackamas County in the Portland metropolitan area south of Portland, Oregon. The planning area includes WES Service Area #2, excluding areas in Boring, Hoodland, and Fischer's Forest Park, WES Service Area #3, and specified adjacent planned growth areas. Service Area #1 is excluded because WES only provides wastewater service in that area. The total planning area is approximately 28,000 acres, and includes 4,500 acres outside the WES service areas in anticipation of their future annexation. The planning area is noncontiguous. The boundaries of the SSMP planning area, service areas and study areas are shown in Figure 1.



CLACKAMAS COUNTY, OR

WES STORM SYSTEM MASTER PLAN

SSMP Study Area

WES Service Area

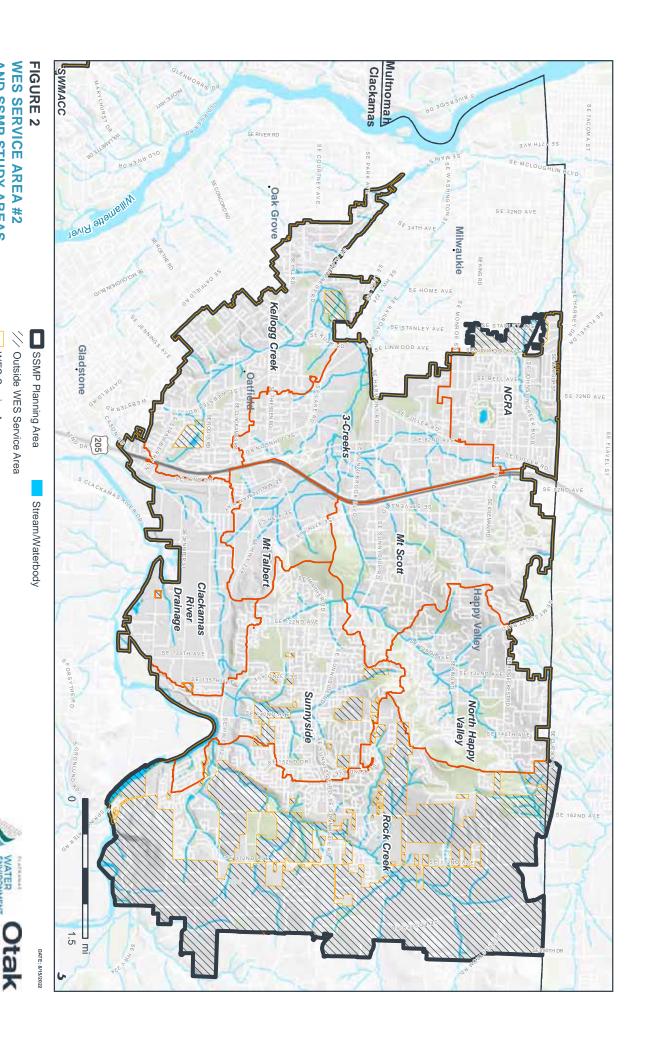
PLANNING AREA

Geography

WES Service Area #2 is located east of the Willamette River and primarily serves the City of Happy Valley and some unincorporated areas of Clackamas County. Adjacent cities include Portland to the north, Milwaukie to the west and Gladstone to the southwest. Adjacent unincorporated communities include Oak Grove to the west and Damascus to the east. Figure 2 WES Service Area #2 and Study Areas shows Service Area #2 and the associated study areas.

WES Service Area #3 comprises three areas west of the Willamette River and serves unincorporated areas of Clackamas County and the City of Rivergrove. Adjacent cities include Lake Oswego to the north, Tualatin and Sherwood to the west, West Linn to the east, and Wilsonville to the south. Sherwood also borders the far west SWMACC area on the north. Figure 3 WES Service Area #3 and Study Areas shows Service Area #3 and the SWMACC study areas.

Clackamas County is one of three counties under the jurisdiction of the Metro regional government (Metro), which manages growth and provides other regional services within the tri-county area. The Urban Growth Boundary (UGB) is established by Metro.



CLACKAMAS COUNTY, OR

AND SSMP STUDY AREAS

WES STORM SYSTEM MASTER PLAN

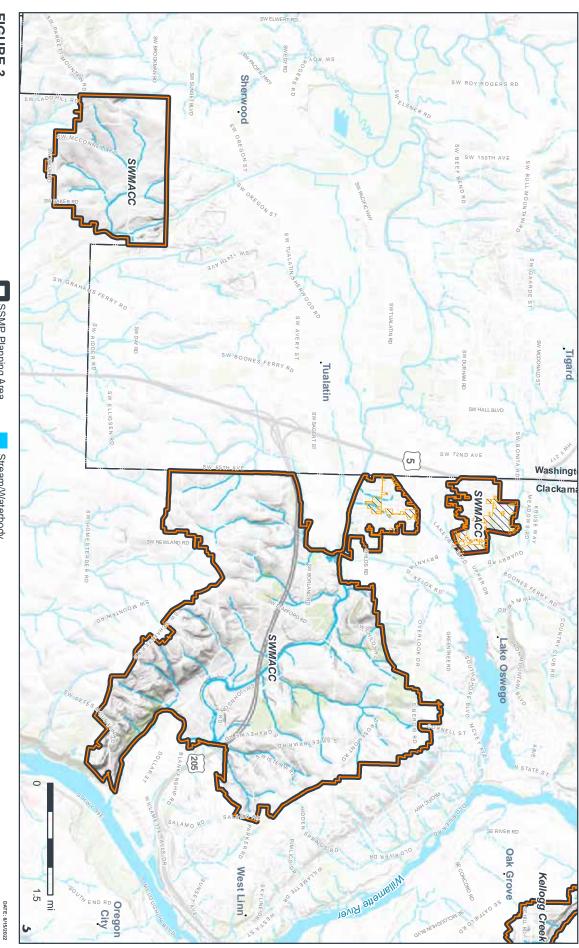
SSMP Study Area

NOTE: THIS DATA IS NOT A SURVEY AND IS MEANT FOR PLANNING PURPOSES ONLY. DATA IS PROVIDED BY ESRI, WES, AND METRO RLIS.

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WATER ENVIRONMENT SERVICES

WES Service Area







Stream/Waterbody

// Outside WES Service Area

SSMP Study Area WES Service Area

WATER ENVIRONMENT SERVICES



Major Watersheds and Topography

Most of Clackamas County and all of the planning area is drained by the Willamette River and its tributaries, including the Clackamas and Tualatin Rivers. The remaining lands are drained by the Sandy River which enters the Columbia River at the City of Troutdale.

Service Area #2 is situated on the east side of the Willamette River, and the area rises eastward from the river toward the Cascade Mountains. The area is cut by the Clackamas River and several creeks including Kellogg Creek, Mount Scott Creek, Phillips Creek, and Rock Creek. These creeks cut into gently rolling, terraced hills creating steep slopes on their flanks. Several extinct volcanos punctuate this terrain, including Mount Scott and Mount Talbert. Elevation in the area ranges from near sea level to nearly 1,100 feet at the top of Mount Scott. (U.S. Department of Agriculture, 1926)

Service Area #3 lies on the west side of the Willamette River. The largest part of the service area consists of the Tualatin River valley. The Tualatin River flows east south of Rivergrove then southeast to the Willamette River with terraced ridges on either side of it. A separate portion of the service area is situated to the north on a flat plain west of Lake Oswego. This area drains to the west to Fanno Creek (outside the service area) which flows south into the Tualatin River. In the southwest, another separate portion of the service area is located on a terrace that slopes gently to the northeast and drains via Coffee Lake Creek (outside of the planning area) to the Willamette River.

The rivers and drainage basins in the WES Service Areas are shown in Figure 4 and Figure 5.

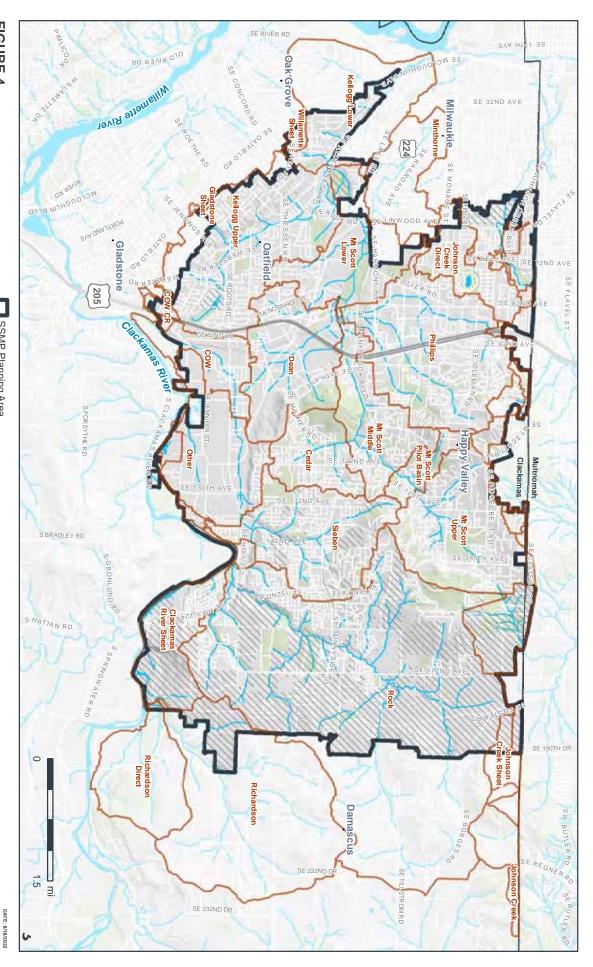


FIGURE 4
WES SERVICE AREA #2
DRAINAGE BASINS
WES STORM SYSTEM MASTER PLAN
CLACKAMAS COUNTY, OR

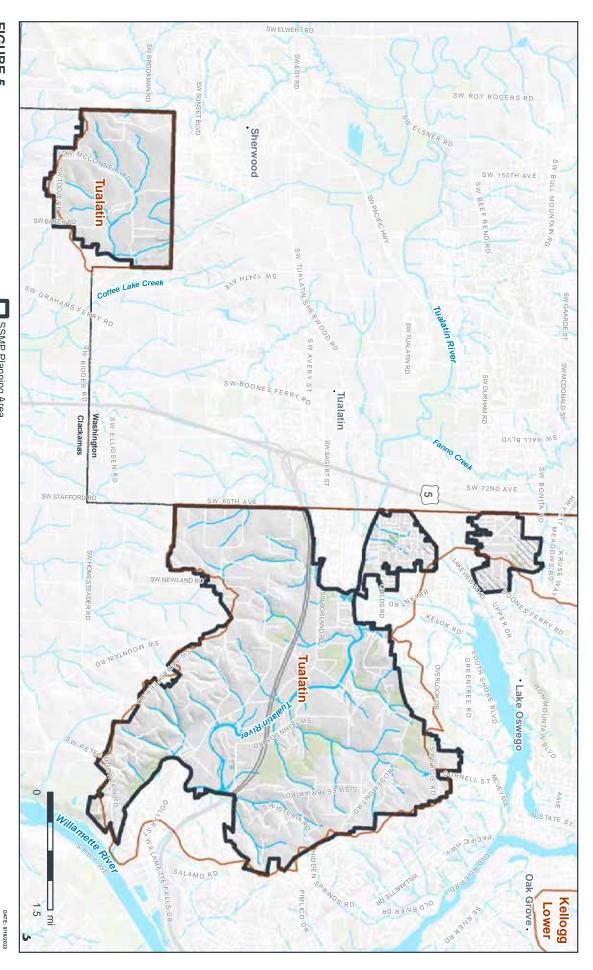
SSMP Planning Area

Outside WES Service Area
Stream/Waterbody

WES Drainage Basins

WATER ENVIRONMENT SERVICES

SERVICES
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Outside WES Service Area

WES Drainage Basins Stream/Waterbody



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Floodplains

Floodplains are frequently inundated lands along streams and rivers. Floodplains naturally store increased flow during storms and are valuable for providing this service. The areas with a 1% chance or greater of flooding in any single year are designated as the Floodway Management District (FMD) by the Federal Emergency Management Agency (FEMA). FEMA refers to these areas as a Special Flood Hazard Area and they are commonly called the 100-year floodplain or the FEMA floodplain (see Figure D). There are approximately 1028 acres of regulated floodway in the planning area, which are described in more detail in the study area descriptions below. (Federal Emergency Management Agency, 2019). Development in these areas is regulated by the Clackamas County Zoning and Development Code and the Happy Valley Buildings and Construction Code.

Climate

Climate data is available from the National Oceanic and Atmospheric Administration website. The planning area is located in the Portland Metro area, and the Portland Weather Service Office is located at Portland International Airport approximately ten miles north-northwest of Happy Valley. According to the 2020 Local Climatological Data Annual Summary with Comparative Data for the Portland Oregon station (KPDX), the region's climate is dominated by the proximity of the Pacific Ocean and the shielding effects of the coast range and the Cascade Mountain range which moderate temperatures and create moderate rainfall. Summers are generally warm and dry while winters are generally cool and wet (National Oceanic and Atmospheric Administration, 2020).

The NOAA, 1991-2020 U.S. Climate Normals for Oregon City state normal mean temperature is 55 degrees F and ranges from an average monthly low temperature of 37 degrees (December) to an average monthly high of 81 degrees (August). Annual total precipitation is 45 inches, and most precipitation falls between October and May (National Oceanic and Atmospheric Administration, 2021).

Soils and Infiltration Capability

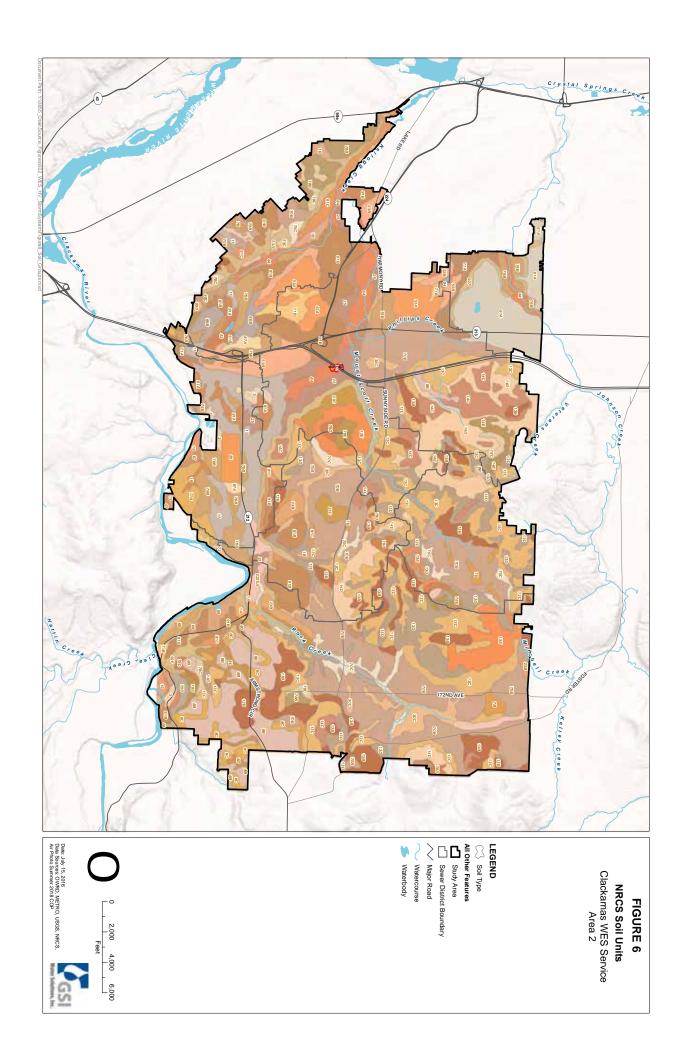
GSI Water Solutions Inc. conducted a preliminary soil infiltration characterization to support this SSMP. GSI assessed surface soil infiltration characteristics for Service Areas #2 and portions of Service Area #3 using data from the Natural Resource Conservation Service (NRCS) online Soil Survey Geographic Database (SSURGO). The results of this survey are included in Appendix A. As Clackamas WES does not have specific criteria for evaluating stormwater infiltration facilities, GSI used the following criteria from the City of Portland's Stormwater Surface Management Manual to develop soil infiltration rankings for the study combined with depth to restrictive layers and depth to groundwater as reported in the NRCS data base. Using these criteria, soil infiltration potential rankings of "good," "moderate," and "poor" were established for the SSMP planning area.

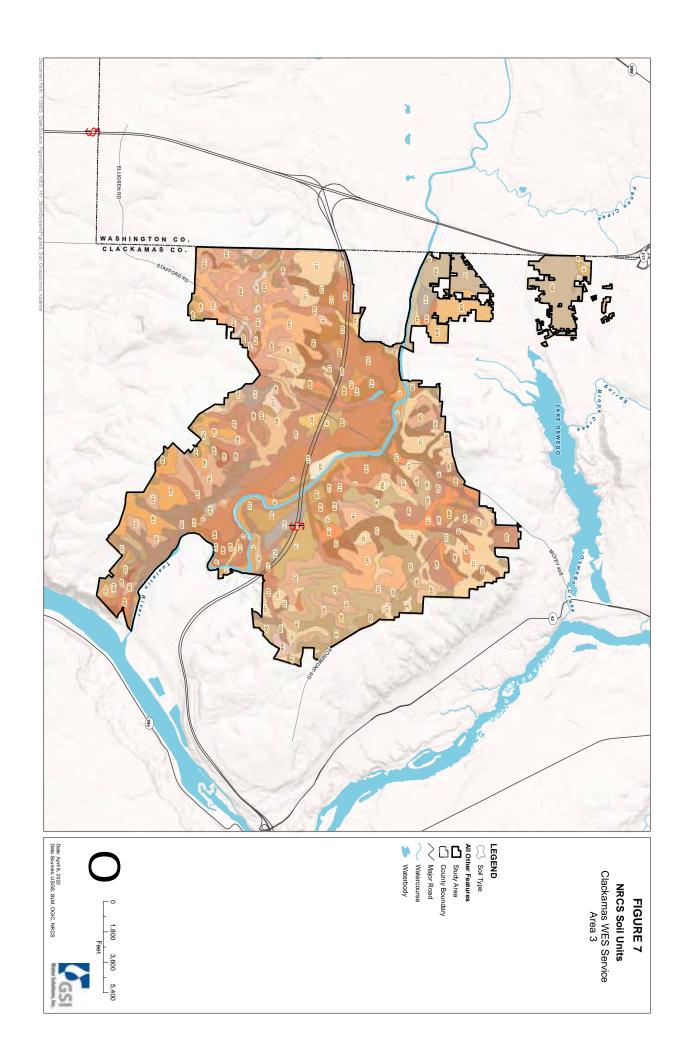
Using these criteria, GSI established rankings for infiltration potential for each soil type and service area. Figure 6 and Figure 7 depict the study areas divided by shallow soil units and corresponding NRCS map symbols. Figure 8 and Figure 9 depict rankings for infiltration potential for each soil type and service area.

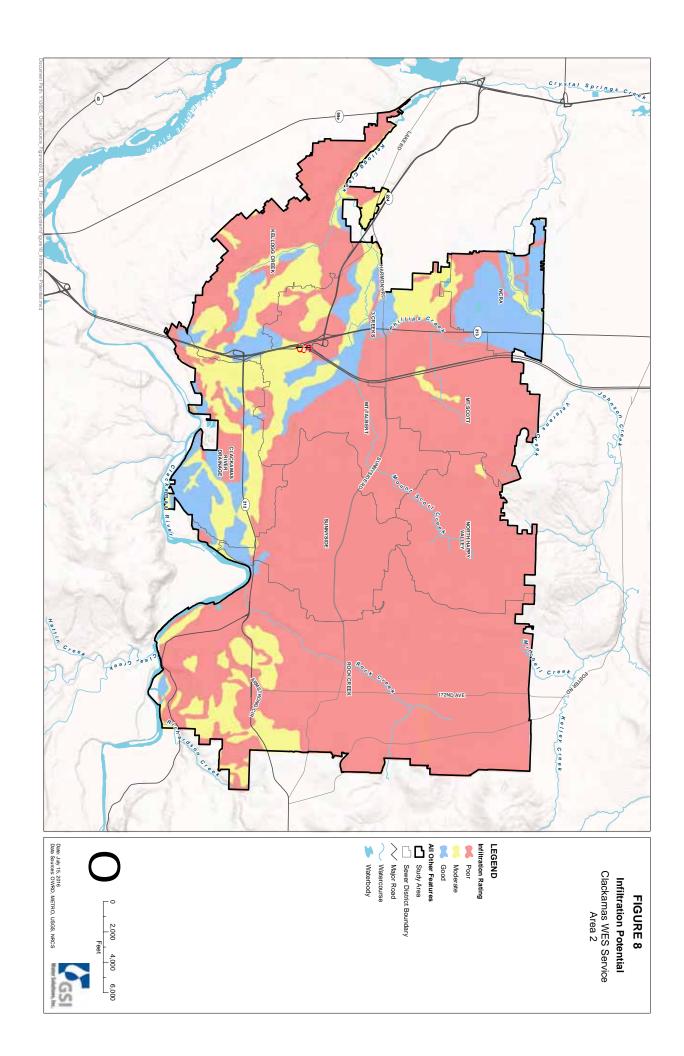
Overall, infiltration potential is poor in most of the planning area except in the northwest portion of Service Area #2, corresponding roughly to the NCRA study area and scattered pockets primarily along the Clackamas and Tualatin Rivers.

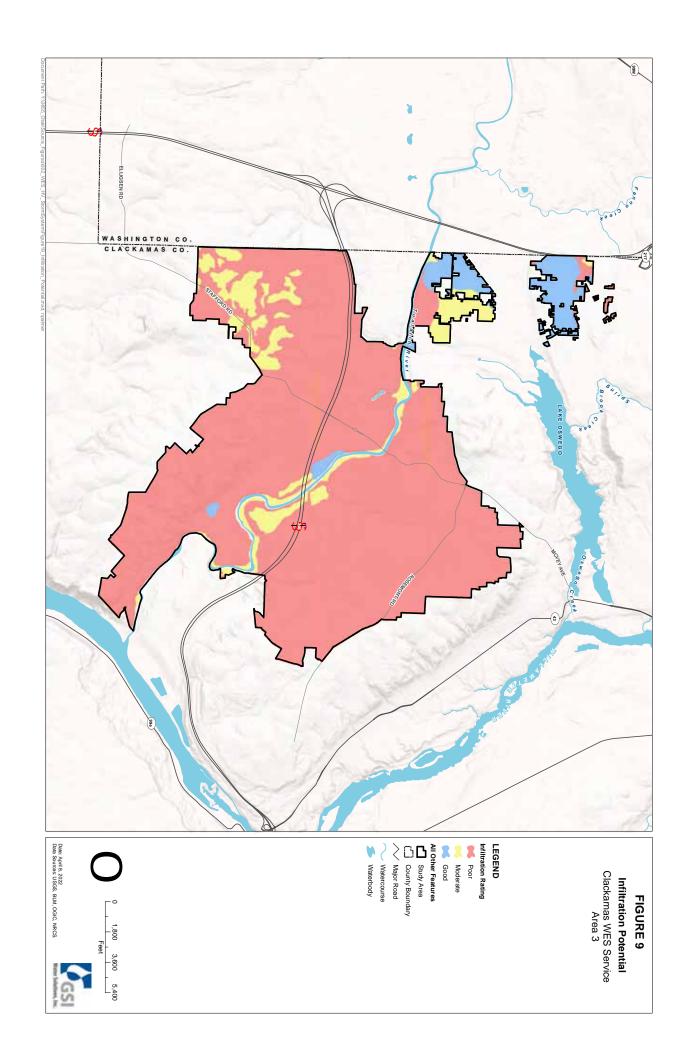
In portions of Service Area #2 where conventional drywells are not an option, it may be possible to infiltrate stormwater into deeper deposits. The low infiltration potential is due to surface level silt deposits, and a potential solution may be to infiltrate stormwater below these layers to gravel or fresh basalt layers. This possibility is illustrated in Figure 10. Geologic conditions in Service Area #3 are not conducive to this approach. In Service Area #3 silt deposits typically overlay basalts with extremely low permeability.

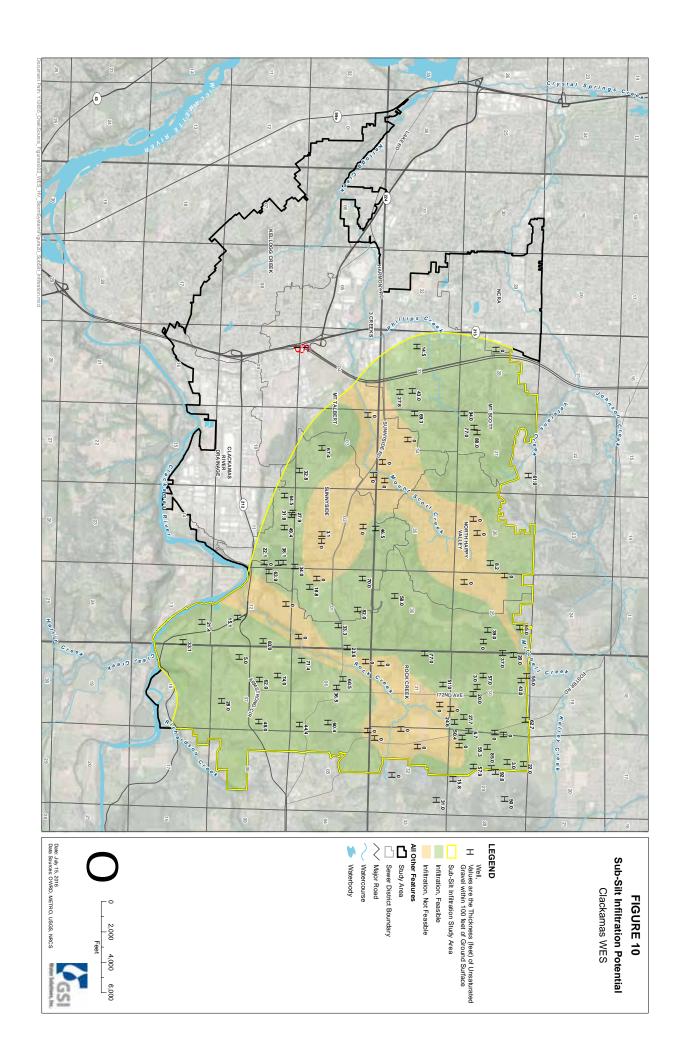
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Study Areas

The planning area is divided into ten study areas. The entirety of WES Service Area #3 is one study area, which corresponds to the historic boundary of SWMACC. WES Service Area #2 contains the other nine study areas. Each study area is described below, and a map of each is provided in Appendix B. Land use information in these maps dates from 2020 when the study began.

North Clackamas Revitalization Area

The North Clackamas Revitalization Area (NCRA) is an urban renewal district located between the City of Milwaukie and Interstate 205 just south of the Multnomah County boundary. It is within WES Service Area #2. The study area is approximately 1,000 acres and is currently developed with low-density residential zoning and a commercial corridor along Interstate 205. The northern portion drains to Johnson Creek and the southern portion to Phillips Creek, both of which eventually flow to the Willamette River.

The NCRA contains approximately 12 miles of stormwater main pipes and 70 mechanical stormwater flow control and treatment facilities, including oil/water separators, hydrodynamic separators, and flow control manholes. There are also 23 vegetated stormwater facilities. Stormwater discharges to 89 drywells. Of these 57 are privately owned. Stormwater discharges to natural waterbodies at 12 outfalls.

NCRA is known to lack public storm sewer conveyances on some residential streets (see Section 6) and experiences minor localized flooding.

3-Creeks

The 3-Creeks study area is located immediately south of the NCRA and consists of unincorporated Clackamas County between the City of Milwaukie and Interstate 205. It is within WES Service Area #2. The area is fully developed with a combination of low-density residential neighborhoods as well as commercial and industrial corridors along the highways. It is named after three creeks (Mount Scott Creek, Dean Creek and Phillips Creek) which combine to form Mount Scott Creek. The study area is approximately 1,700 acres.

The 3-Creeks study area contains approximately 34 miles of stormwater main pipes and 163 mechanical stormwater flow control and treatment facilities, including oil/water separators, hydrodynamic separators, and flow control manholes. There are also 54 vegetated stormwater facilities. Stormwater discharges to 58 drywells. Of these ten are privately owned. Stormwater discharges to natural waterbodies at 60 outfalls.

The study area is known to experience flooding along the lower reaches of Mount Scott Creek. WES is in the process of developing a project to reduce flooding and improve environmental functions at the 3-Creeks Natural Area. The project will enhance the floodplain, improve detention capacity to decrease downstream flooding, and increase habitat. The project is in preliminary design as of summer 2022.

Kellogg Creek

The Kellogg Creek study area consists of unincorporated Clackamas County between SE McLoughlin Boulevard and approximately I-205. It is within WES Service Area #2. The area drains to Kellogg Creek, which eventually flows into the Willamette River. The study area is approximately 2,100 acres and is fully developed almost entirely with low-density residential neighborhoods (Brown and Caldwell, 2009). The 45-acre incorporated city of Johnson City along SE Roots Road, which is not within the WES Service Area, is fully enclosed within this study area.

The Kellogg Creek study area contains approximately 31 miles of stormwater main pipes and 70 mechanical stormwater flow control and treatment facilities, including oil/water separators, hydrodynamic separators, and flow control manholes. There are also 49 vegetated stormwater facilities in this area. Stormwater discharges to 104 drywells. Of these 28 are privately owned. Stormwater discharges to natural waterbodies at 73 outfalls.

In 2009, WES published the *Kellogg-Mt. Scott Watershed Action Plan* by Brown and Caldwell, including the Upper Kellogg basin, which is generally equivalent to this plan's Kellogg Creek study area. Upper Kellogg creek is known to experience significant flooding along creeks, and the action plan documents structure flooding in and around Southeast Aldercrest Road, west of Southeast Clackamas Road as it crosses Upper Kellogg Creek, northwest of Southeast Mabel Avenue as it crosses Upper Kellogg Creek, and Southeast Lillian Avenue. The data collection for this plan corroborates the existence of flooding problems in the Kellogg Creek study area. The action plan also documents concern for erosion of the stream banks in Upper Kellogg Creek.

The action plan documents changes to water quality and hydrology of streams in the Kellogg Creek, Mount Scott, and Mount Talbert study areas and recommends several actions related to storm system operations and improvements, which have been considered in this SSMP, including:

- Tracking and addressing flooding complaints related to WES infrastructure.
- Evaluating fish passage barrier removal opportunities.
- Developing a stormwater quality structural BMP retrofit program for streets in coordination with DTD.

Mount Scott

The Mount Scott study area consists of portions of the City of Happy Valley east of Interstate 205 and south of the Multnomah County boundary. It is within WES Service Area #2. The area drains to Phillips Creek in the north and Mount Scott Creek in the south. Phillips Creek flows into Mount Scott Creek in the 3-Creeks study area which then flows into the Willamette River. The study area is approximately 2,000 acres and is built out with low-density residential with some mixed-use commercial along Interstate 205 (City of Happy Valley, 2018; Brown and Caldwell, 2009).

The Mount Scott study area contains approximately 49 miles of stormwater main pipes and 182 mechanical stormwater flow control and treatment facilities, including oil/water separators, hydrodynamic separators, and flow control manholes. There are also 48 vegetated stormwater facilities. Stormwater discharges to three drywells. Of these one is privately owned. Stormwater discharges to natural waterbodies at 88 outfalls.

Local flooding of streets and private property from public roads and the storm system have been documented; some of the issues are thought to be related to inadequate storm system design for steep roads. Concurrently with this plan, WES is studying storm system capacity to address flooding in a steep neighborhood south of Mount Scott Nature Park near SE William Otty Road and SE 121st Court.

In 2009, WES published the *Kellogg-Mt. Scott Watershed Action Plan* by Brown and Caldwell, which includes the area encompassed by this plan's Mount Scott study area. Please see the section above on Kellogg Creek for recommendations from the action plan.

Mount Talbert

The Mount Talbert study area consists of portions of unincorporated Clackamas County and the City of Happy Valley between Interstate 205 and the Mount Talbert Nature Park. It is within WES Service Area #2. The area drains to Dean Creek which flows into Mount Scott Creek then to the Willamette River. The study area is approximately 800 acres and is developed with business parks and high-density residential uses (Clackamas County, 2020; City of Happy Valley, 2018).

The Mount Talbert study area contains approximately seven miles of stormwater main pipes. In the area are 43 mechanical stormwater flow control and treatment facilities, including oil/water separators, hydrodynamic separators, and flow control manholes. There are also 36 vegetated stormwater facilities in this area. Stormwater discharges to five private drywells. Stormwater discharges to natural waterbodies at 18 outfalls in this area.

In 2009, WES published the *Kellogg-Mt. Scott Watershed Action Plan* by Brown and Caldwell, which includes the area encompassed by this plan's Mount Talbert study area. Please see the section above on Kellogg Creek for recommendations from the action plan.

North Happy Valley

The North Happy Valley study area consists of portions of the City of Happy Valley generally west of SE 152nd Avenue and immediately south of the Multnomah County boundary. It is within WES Service Area #2. The area drains to the upper reach of Mount Scott Creek which then flows through the Mount Scott study area to Kellogg Creek. The flow from the North Happy Valley study area passes through the Mount Scott, 3-Creeks, and Kellogg Creek study areas on the way to the Willamette River. A small portion near the county border drains northwest toward Portland and Johnson Creek and a small portion at the northeast corner drains east through Mitchell Creek, a tributary of Johnson Creek. The study area is approximately 1,600 acres and is developed with low- to medium-density residential and public uses (City of Happy Valley, 2018).

The North Happy Valley study area contains approximately 38 miles of stormwater main pipes and 140 mechanical stormwater flow control and treatment facilities, including oil/water separators, hydrodynamic separators, and flow control manholes. There are also 52 vegetated stormwater facilities in this area. Stormwater discharges to four private drywells and to natural waterbodies at 89 outfalls.

In 2009, WES published the *Kellogg-Mt. Scott Watershed Action Plan* by Brown and Caldwell, which includes the most of the area encompassed by this plan's North Happy Valley study area. Please see the section above on Kellogg Creek for recommendations from the action plan.

Sunnyside

The Sunnyside study area consists of unincorporated Clackamas County and City of Happy Valley centering on SE Sunnyside Road. It is within WES Service Area #2. The area is an irregular shape bound roughly by SE Aldridge Road to the north, Mt. Talbert Nature Park to the west, the Clackamas River to the south, and SE 152nd Avenue to the east. The study area is approximately 2,000 acres. Most of the area drains southward to the Clackamas River through the Sieben Ditch and unnamed minor streams, although the western portion drains northerly through Mount Scott Creek. The study area is approximately 2,000 acres and is zoned low density residential, with some open space and small commercial sections along Highway 212 (Clackamas County, 2020; City of Happy Valley, 2018).

The Sunnyside study area contains approximately 59 miles of stormwater mains, 239 mechanical stormwater flow control and treatment facilities, including oil/water separators, hydrodynamic separators, and flow control manholes. There are also 65 vegetated stormwater facilities. Stormwater discharges to one private drywell and to natural waterbodies at 87 outfalls.

Clackamas River

The Clackamas River study area is approximately 1,400 acres and consists of unincorporated Clackamas County east of Interstate 205 and north of the Clackamas River. It is within WES Service Area #2. The area sits on a flat plain and drains directly to the Clackamas River and to the river through Cow Creek. The area is zoned for general and light industrial uses and is fully developed with warehouses and business parks.

The Clackamas River Drainage study area contains approximately 24 miles of stormwater main pipes and 133 mechanical stormwater flow control and treatment facilities, including oil/water separators, hydrodynamic separators, and flow control manholes. There are also 50 vegetated stormwater facilities in this study area. Stormwater discharges to 28 drywells. Of these 27 are privately owned. Stormwater discharges to natural waterbodies at 52 outfalls.

Rock Creek

The Rock Creek study area is 5,800 acres and consists of portions of unincorporated Clackamas County east of Happy Valley and the eastern portion of Happy Valley. It is within WES Service Area #2. The study area stretches from the Multnomah County boundary at the north to the Clackamas River at the south. The area is drained by Mitchell Creek, a tributary of Johnson Creek, and by Rock Creek, which flows to the Clackamas River. The area is primarily used for agriculture, private forest land, open space, and rural residences (City of Happy Valley, 2018; Brown and Caldwell, 2009). Approximately 2,700 acres in the easternmost portion of the Rock Creek study area were brought into the Urban Growth Boundary about 20 years ago and are included in Pleasant Valley North Carver (PVNC) Comprehensive Plan (see more below).

The Rock Creek study area contains approximately 35 miles of stormwater main pipes and 140 mechanical stormwater flow control and treatment facilities, including oil/water separators, hydrodynamic separators, and flow control manholes. There are also 175 vegetated stormwater facilities in this area. Stormwater discharges to natural waterbodies at 69 outfalls in this area.

Most of the stormwater management opportunities in the Rock Creek study area are regional facility concepts in PVNC.

Related Planning Processes

Happy Valley is in the process of comprehensive planning for expansion in PVNC. The area is part of the Rock Creek Study area directly east of Happy Valley. The area is transected by many creeks that are tributaries of Rock Creek. The Pleasant Valley/North Carver Comprehensive Plan Area includes a variety of existing and proposed land uses ranging from agriculture and low density rural residential to a range of residential land use densities and some commercial and employment areas. Portions of the area, particularly to the south, have already been developed to proposed densities, other areas are proposed to remain very low density residential, and still others are proposed to become much more densely developed than current conditions. Portions of the area have very steep slopes that have been identified as conservation areas where little to no future development will occur.

In areas of PVNC where development has occurred recently, it is assumed that stormwater infrastructure is already in place and additional stormwater management and conveyance infrastructure would be constructed site by site, on an as needed basis. Regional stormwater ponds have been proposed in the areas where substantial new development is proposed. This SSMP determined preliminary sizes and proposes tentative locations for 14 regional stormwater facilities in the PVNC area described in Section 7, Implementation Plan. Establishing regional stormwater facility locations during planning for the area will facilitate future development of the area. (City of Happy Valley, 2021)

SWMACC

The SWMACC study area is 9,758 acres consisting of three non-contiguous areas that are within WES Service Area #3.

7,816 acres straddle Interstate 205 and the Tualatin River south of the City of Lake Oswego and abut the Washington County boundary to the west. The majority is unincorporated Clackamas County and also encompasses the small city of Rivergrove. This part of the study area drains to the Tualatin River. This area is zoned rural residential and agriculture in the county, and the residential areas are partially built out.

North of this is 231 acres of the study area between the Washington County boundary and I-5 and the City of Lake Oswego. This section drains west to Fanno Creek (outside of the SSMP planning area), which flows into the Tualatin River. This area is within the UGB and is developed with low-density housing.

1,674 acres is located south of Sherwood and bounded on three sides by Washington County. This section primarily drains to Rock Creek which flows north to the Tualatin River. A small portion flows south to Mill Creek which flows to Corral Creek and then to the Willamette River. This area is zoned rural residential and agriculture, and the residential areas are partially built out. (Clackamas County, 2020)

The SWMACC study area is largely rural and has relatively little public storm sewer infrastructure. It contains approximately five miles of stormwater main pipes and 23 mechanical stormwater flow control and treatment facilities, including oil/water separators, hydrodynamic separators, and flow control manholes. There are also 44 vegetated stormwater facilities. Stormwater discharges to 66 drywells. Of these one is privately owned. Stormwater discharges to natural waterbodies at 27 outfalls.

Section 3. Planning Process

In 2019, WES retained Otak to coordinate development of the SSMP. The primary outcomes of the SSMP are a recommended set of programs to address systemic problems and a stormwater CIP to address capital construction needs for conveyance and water quality. The planning methodology selected for this SSMP relies primarily on identifying problems through an analysis of existing conditions. Future conditions are addressed in areas where significant growth or infill are expected.

Existing conditions for flow and water quality concerns were characterized using existing studies and institutional knowledge collected from the staff of WES, DTD, and the City of Happy Valley. Otak examined previous planning documents, storm sewer maintenance records, requests for service, and interviewed staff to identify the backlog of existing problems. The information collected from these sources was compiled, mapped, and used for analysis and as a basis for field visits.

The majority of known issues were documented from three sources. About 54% of the known issues were identified by WES staff during a 2017 CIP review which was revisited and updated in 2019 for this plan. Another 26% were identified by talking to staff, relying on their familiarity with the system and its function, and 16% were identified by reviewing maintenance records and other documentation. The remainder were documented from various sources.

To support the known issue identification and solutions analysis, Otak collected and mapped supporting data, including hydrologic basin delineation and storm system convenance.

Initial System Review

Identifying known issues was the first step in the process of studying the storm system and developing solutions. Otak compiled a list of storm system issues already known to WES, DTD, and the City of Happy Valley for evaluation and consideration for inclusion in the SSMP. Sources of information reviewed included previous storm drainage master plans, watershed action plans, existing Capital Improvement Programs (CIPs), the Happy Valley Comprehensive Plan, Clackamas County Comprehensive Plan, and Pleasant Valley / North Carver (PVNC) Comprehensive Plan, and interviews with WES and City of Happy Valley staff.

Identified storm system issues were compiled along with geographic data in an ESRI geodatabase. Each site was designated a "known issue" and given a unique identification number in the geodatabase and conditions at each site described in detail. The known issues were then classified into four categories: water quality, water quantity, erosion, and maintenance. Sites with known issues could be classified into multiple categories if appropriate.

Water quality issues consist of discharges of untreated runoff to natural water resources. These include stormwater detention ponds without treatment, and underground injection controls (UICs) that discharge

untreated stormwater to shallow groundwater. Water quality issues were identified through the system inventory.

Water quantity issues consisted of pipes, outfalls, and culverts that lack sufficient conveyance capacity during storms. Lack of capacity can result in slow drainage, local flooding, and backwatering the upstream system. Most capacity issues were identified through observation of current flooding and backwater conditions without reliance on assumptions about future conditions.

Erosion issues are areas where stormwater discharge volume or intensity cause erosion in the receiving water, requiring restoration or stabilization.

Maintenance issues include a wide variety of issues. These include detention ponds with poor maintenance history or that are difficult to maintain, inlets which clog or have collapsed, and pipes and culverts that have cracked or broken or are clogged by roots or have collapsed.

To further describe some of the known issues, 60 sites were selected for field visits to document site conditions and collect information to develop potential solutions. Otak staff were often accompanied by WES staff on these visits. Staff recorded information about the primary observed problem, underlying issues, solution alternatives, project feasibility, and potential impacts of alternative solutions.

Modeling Review

A review was conducted of existing hydrologic and hydraulic models used in the WES Service Areas to assess their value for identifying problem areas for inclusion in the "known issues" list. After review, none of the models were used to identify problems or develop CIP projects. In each case, the models had limitations that made them unhelpful for this planning process. Models were obsolete or the data available was out of date or insufficiently detailed for the study area.

WES has developed a simplified Best Management Practice (BMP) sizing tool based on the HSPF Hydrologic Model that is capable of sizing facilities to meet post-construction stormwater management requirements. This tool is sufficient for the concept level design of the CIP projects developed for the SSMP, and it was used for some CIPs. Implementing the recommended CIP projects would require detailed design. Data collection and modeling should be included in the project design costs, and the project cost estimates included in this plan reflect the cost of these efforts where required.

The details of this model review are included with this plan in Appendix C.

Identified Known Issues

Through the initial system analysis, a total of 217 known issue locations were mapped where storm system issues were identified. Counts and percentages of known issues by type are presented in Table 2 and Figure 11. Some issues fall into multiple categories.

Table 2 Known Issues by Type

Type of Issue	Count ¹	Category Description
Quality	81	Quality of runoff discharges
Quantity	134	Water quantity, typically flooding
Erosion	26	Erosion in a natural resource
Maintenance	54	Maintenance of stormwater facilities

¹ Many issues fall into multiple categories, so the total count of these categories does not add up to 217, which is the total number of sites with known issues.

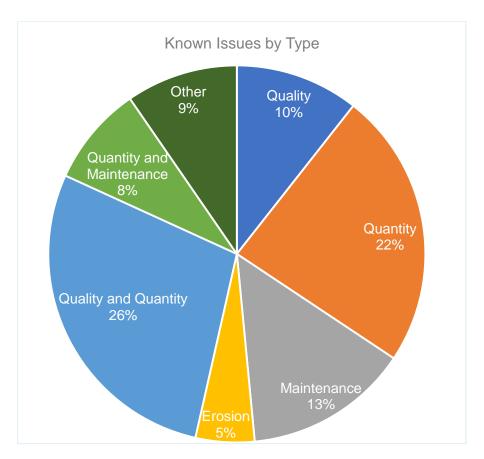


Figure 11 Known Issues by Type

A memo summarizing this process and listing all issues is presented in Appendix D.

The project atlas in Appendix E also maps the location of identified issues, including those eventually determined to be private concerns.

Potential Solutions

For most known issues, a potential solution was proposed. A solution to a known issue could either be a large capital project or a programmatic solution. For each known issue that would be best solved with a capital improvement project a solution idea (potential project) was generated. Section 4 describes the further development and selection of potential projects.

Programs are groups of similar small and medium projects that are addressed gradually over time with fixed yearly funding. Most of the known issues can be grouped into programs that will enable the WES staff to address stormwater needs that require attention but do not rise to the scale or priority level of a capital project. Some programs have already been defined in the WES 2018-2023 Capital Improvement Plan. In addition to these, this SSMP proposes to develop new programs to address common problems among the known issues. Program candidates were also identified in the Known Issues Geodatabase.

A few known issues were designated as "no action" because the site visit or additional information determined that no additional action is recommended. This could include issues or locations on private property or not within WES jurisdiction or authority to resolve.

Section 4. Stormwater CIP

Screening Methodology

The system analysis and planning process outlined in Section 3 was used to develop a comprehensive potential project list. Known issues that can be resolved with programs are described in Section 5.

Screening and Capital Project Selection

The project selection consisted of two steps: screening out program candidates and identifying potential stormwater capital projects.

Identify Program Candidates

Some types of issues are widespread and/or similar in nature and may be important to address but are not urgent. In a typical CIP, these important but non-urgent issues may be passed over for several reasons. Any one issue might be too small to consider individually. Alternately, a large issue may not be urgent enough to compete for available funds against critical repairs or storm sewer capital investments that are driven by the priorities of other county departments. When these non-urgent but important improvements are not addressed, they can eventually become urgent or get in the way of meeting long-term goals such as water quality improvement.

When issues similar to each other were, as a group, important but not urgent, Otak screened them out of consideration for the Stormwater CIP and grouped them into five programs: Small Drainage Projects; Stormwater Pond Repair and Rehabilitation; Water Quality Retrofit; Restoration and Property Acquisition; and UIC Decommissioning and Retrofits. For example, the numerous detention ponds that discharge untreated stormwater were grouped into the Water Quality Retrofits Program. Otak calculated a cost estimate and proposed an annual budget for each program, which would allow WES to proactively address individual issues systematically over time. Of the initial issues, 60% were grouped into one of these programs. See Section 5 for additional information on these programs.

Identify Potential Stormwater Capital Projects

For each remaining issue after grouping some issues into programs, the Otak team identified an initial concept for a potential Stormwater CIP project that could correct the issue. In some cases, adjacent issues could be solved simultaneously and with a single effort, so they were combined into a single potential project. Otak identified a total of 33 potential CIP projects for further consideration. These 33 were then evaluated to determine feasibility and priority for selection as CIP projects. Table 3 contains the list of potential projects evaluated for inclusion in the CIP.

Table 3 Potential CIP Projects

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1145 129th Ave Culvert south of King Rd 1146 SE 129th & King Rd Storm Pipe Repair 1307 Sunburst Ln Hillside Culvert 1508 SE Shady Meadow Ct Backyard Conveyance	1415	Greenspace Pipe at SE Dundee Dr Near Carnaby Way
1145 129th Ave Culvert south of King Rd 1146 SE 129th & King Rd Storm Pipe Repair 1307 Sunburst Ln Hillside Culvert 1508 SE Shady Meadow Ct Backyard Conveyance	1411	SE Parmenter Dr Backyard Drainfield Replacement
1307 Sunburst Ln Hillside Culvert 1508 SE Shady Meadow Ct Backyard Conveyance	1145	
1508 SE Shady Meadow Ct Backyard Conveyance	1146	SE 129th & King Rd Storm Pipe Repair
	1307	Sunburst Ln Hillside Culvert
1405 Sunnycreek Outfall Rehabs and Stream Restoration	1508	SE Shady Meadow Ct Backyard Conveyance
	1405	Sunnycreek Outfall Rehabs and Stream Restoration

Project Rating and Ranking Process

The number of potential projects was too large for the WES to consider in a ten-year Stormwater CIP. To reduce the list into a manageable size for creating conceptual designs and cost estimates, a set of rating criteria to score and rank the potential projects were developed. Only the highest-scoring projects were then further developed and presented as the Stormwater CIP.

Develop Rating Criteria

During a series of workshops and meetings throughout 2020, Otak worked with WES, Clackamas County DTD, and City of Happy Valley stakeholders to explore the drivers and goals of the SSMP. Those meetings also resulted in the criteria used to rate and rank potential projects. The basis of developing the rating criteria were the values of the Clackamas County and the City of Happy Valley and the practical needs of operating the storm system. During the earliest workshop with staff, a brainstorm about the values of the County and City and the values of the staffs yielded many areas of significance. Some of the key items included:

- Public and worker safety
- Environmental stewardship
- Providing infrastructure for growth
- Resiliency and adaptability
- Partnership between organizations and with residents
- Care for underserved communities

The rating criteria also incorporated project assessment criteria used by WES in 2017. During the visioning discussion, the assessment criteria were reviewed and adjusted. The following criteria were included in the 2017 CIP assessment and continued into the current assessment:

- Magnitude and frequency of the problem
- Watershed priority and health
- Regulatory requirements (MS4/TMDL/UIC)
- Site ownership and constraints

Ultimately, 17 rating criteria were developed and grouped into six categories as presented in Table 4.

Table 4 CIP Project Rating Criteria

Categories	Criteria	Scoring Concept Project scores higher when:	
Watershed	Ecosystem Health	It provides direct improvement to riparian habitat or aquatic biological communities	
Health Improvements	Stream Channel	It directly or indirectly improves stream channel stability, reduces erosion, or reduces the quantity or rate of stormwater discharges to a water body	
Water Quality	Pollutant Reduction	It is more effective in removing pollutants from runoff	
Improvements	Treated Land Use	The runoff directed to the stormwater facility is dirtier	
	Acres Treated	The facility treats a greater number of acres	
Conveyance and	Frequency	The project site floods more frequently in the existing (pre- project) condition	
Flooding	Extent	The extent of flooding on the project site is greater	
	Flood Risk	Flooding threatens lives, buildings, or important infrastructure	
	Underserved Areas	The project site is located in an area with insufficient public storm sewer service	
Multiple Benefits	Project Coordination	Project can be easily coordinated with other entities to either share costs or achieve multiple objectives while reducing disruptions to the community	

Categories	Criteria	Scoring Concept Project scores higher when:	
	Community Amenities	Project can be expanded to include educational or recreational amenities to the community	
	Streamline Maintenance	It reduces frequency that maintenance is required	
Maintenance	Safety/Access	It improves maintenance access to a less accessible location or improves safety for workers	
	Useful Life	Extends the useful life of an existing asset or, if a new asset is constructed, is a permanent solution	
	Site Constraints	The site has fewer constraints on construction (e.g. steep slopes)	
Implementation	Type of Permitting	The project requires fewer and/or less complex permits prior to construction	
	Property Acquisition	Does not require property acquisition	

Scoring

After the initial scoring criteria were established, a trial run was used to evaluate whether the scoring criteria aligned with the adopted goals and performance priorities. Otak scored the potential projects and asked the WES and City staffs to comment on the resultant project scores.

During the review process, a number of changes were made to the criteria and weighting. Service Area #3 was re-examined because no CIPs were originally identified in Service Area #3. A new program was established to accomplish most stream restoration and culvert replacement projects. These projects would not fall under WES's Stormwater CIP because they require coordination with other entities. Including this program removed some highly ranked projects from the CIP list.

The top 20 projects from the initial round of scoring were subjected to a second round of review and reranked. The final criteria matrix is presented in Appendix F. WES approved the final scoring criteria and the ranked list. Table 5 presents the final scores and rankings of 33 potential projects. See Figure 12 for a map of these locations.

Table 5 Project Scores and Ranks

Rank	PPID	Name	Score
1	1124	3-Creeks Floodplain Enhancement Project	75.0
2	1005	SE Wildlife Estates Dr Ditch Inlet & Upstream Detention	57.5
3	1413	SE Valley View Terrace New Conveyance	57.0
4	1079	Aldercrest Culvert Replacement & Kellogg Creek Restoration	56.0
5	1606	NCRA Stormwater Plan	56.0
6	1055	Thiessen Culvert Replacement & Kellogg Creek Restoration	55.0
7	1406	Sunnyside Place Culvert Replacement & Stream Restoration	53.0
8	1306	Solomon Court Culvert/Fill Removal & Creek Restoration	
9	1416	Idleman Conveyance	51.5
10	1089	Parmenter Rd Culvert Replacement & Kellogg Creek Restoration	51.0
11	1322	SE 172nd Ditch Conveyance Improvement	50.5
12	1028	130th/135th Ave Outfall/Stormwater Treatment Facility	50.0
13	1091	SE Clackamas Road Drainage Infrastructure	47.5
14	1098	Rose Creek New Detention Pond and Instream Restoration	57.0

Rank	PPID	Name	Score
15	1125	Aldercrest and Rusk Drainage Improvement	45.5
16	1503	Clackamas High School Cattle Field Conveyance	45.0
17	1325	Hamilton Ln Drainage and Pond Rehab	44.0
18	1013	Mabel Ave Swale Sedimentation	42.5
19	1023	Emerald Loop Drainage Swale Rehab	41.0
20	1017	Pipe Rehabs: Spring Mountain, Cavalier, Mystery Springs	40.5
21	1136	Echo Valley Meadows Restoration Phase 2	40.0
22	1021	Mountain Gate Road Conveyance	38.5
23	1003	SE 147th Ave. Conveyance	37.0
24	1320	Regency View & 137th Hillside Inlet Improvements	35.5
25	1505	SE Boyer Dr Parking Lot Pipe Replacement	35.5
26	1321	SE 162nd Culvert Replacement	33.0
27	1608	SE 145th at Mt Scott Creek Conveyance	32.5
28	1411	SE Aldercrest Loop & Willow Lane Conveyance	31.5
29	1507	Safeway Distribution Center ROW Conveyance	30.5
30	1415	Outfall Rehab in Greenspace at SE Dundee Dr Near Carnaby Way	28.5
31	1145	129th Ave at SE Scott Creek Ln Culvert Repair/Replace	27.0
32	1146	SE 129th & King Rd Culvert Repair/Replace	27.0
33	1405	Sunnycreek Outfall Rehabs & Stream Restoration	19.0

Repeatable Methodology

The process described above is a repeatable methodology for rating, ranking and prioritizing capital projects. The methodology uses criteria that reflect WES's values.

Stormwater CIP Project List

After determining the project scores and ranks, ten projects were selected as presented in Table 6 for implementation over the next ten years.

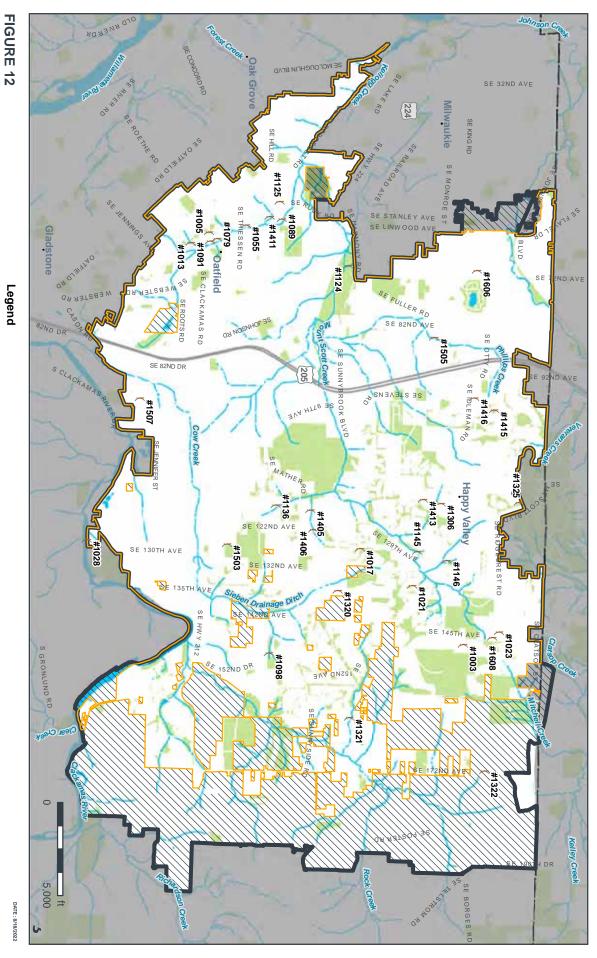
Two ranked projects were already in design and were not included in the new CIP: CIP 1124, 3-Creeks Floodplain Enhancement Project and CIP 1413, SE Valley View Terrace Conveyance. Two high-ranking stream restoration projects were not included because WES requires the CIP to include a balance of project types: CIP 1306, Solomon Court Culvert/Fill Removal & Creek Restoration and CIP 1089, Parmenter Culvert Replacement & Kellogg Creek Restoration.

Table 6 Selected Stormwater CIP

CIP No	Rank	Project Name	Study Area	Primary Project Benefits	Cost
1005	2	SE Wildlife Estates Dr. Ditch Inlet & Upstream Detention	Kellogg Creek	 Reduce erosion and improve habitat in Tributary C of Kellogg Creek Reduce flooding of road and private property Improve water quality in Kellogg Creek Reduce maintenance requirements for WES staff 	\$1,679,470

CIP No	Rank	Project Name	Study Area	Primary Project Benefits	Cost
1055	6	Thiessen Culvert Replacement & Kellogg Creek Restoration	Kellogg Creek	 Prevent flooding of private property Prevent flooding of roadway Improve fish passage 	\$801,635
1079	4	Aldercrest Culvert Replacement & Kellogg Creek Restoration	Kellogg Creek	Reduce floodingImprove fish and wildlife habitat	\$1,865,013
1091	13	SE Clackamas Rd. Drainage Infrastructure	Kellogg Creek	 Reduce flooding on roadway and private property Improve habitat and stream channel stability 	\$508,400
1098	14	Rose Creek New Detention Pond and Instream Restoration	Sunnyside	 Stabilize the stream bank and minimize headcutting Reduce roadway flooding downstream of the site Improve aquatic habitat and water quality 	\$2,589,010
1125	15	Aldercrest and Rusk Drainage Improvement	Kellogg Creek	 Protect private property and roadway from flooding 	\$440,100
1322	11	SE 172 nd Ditch Conveyance Improvement	Rock Creek	Reduce floodingProtect private property and roadway	\$88,800
1406	7	Sunnyside Place Culvert Replacement & Stream Restoration	Sunnyside	 Reduce flooding on roadway and private property Improve habitat and stream channel stability 	\$573,623
1416	9	Idleman Conveyance	Mount Scott	Reduce flooding on roadway and private property	\$1,394,900
1606	5	NCRA Stormwater Plan	NCRA	 Reduce flooding in the Johnson Creek Watershed Improve water quality in Johnson Creek 	\$5,144,850
Total					\$15,085,801

The final project list reflects WES's priorities of ensuring adequate drainage in the storm sewer and creek systems as well as improving the water quality of runoff discharged to natural resources. A map of the Stormwater CIP projects is presented in Figure 13. The CIP project details are included in Appendix G.



PROJECTS CLACKAMAS COUNTY, OR WES STORM SYSTEM MASTER PLAN

POTENTIAL CIP

Legend

SSMP Planning Area (Potential CIP Project

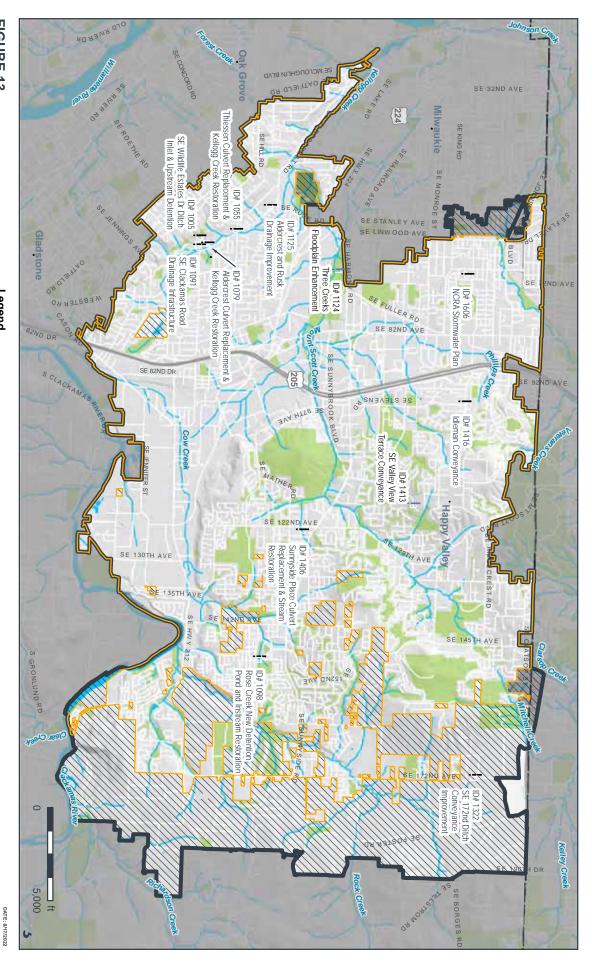
// Outside WES Service Area

WES Service Area

Outdoor Recreation and Conservation Areas

WATER ENVIRONMENT SERVICES





CLACKAMAS COUNTY, OR WES STORM SYSTEM MASTER PLAN **PROGRAM PROJECTS CAPITAL IMPROVEMENT** FIGURE 13

Legend

CIP, Existing (Rank)

CIP, Planned (Rank)

SSMP Planning Area

Outside WES Service Area

WES Service Area

Outdoor Recreation and Conservation Areas





Cost Estimating Procedure

Based on the scoping-level design of each selected project, a cost estimate was prepared using the methods further detailed below. Costs were estimated for design, permitting and mitigation, land acquisition and easements, and construction and materials. Costs are presented in 2020 dollars.

In the future, when WES establishes a budget for each CIP, or when the CIP program is considered in a rate setting study or similar financial study, costs should be escalated using an established index to the then-current year. The Engineering News Record Construction Cost Index is one example.

Stormwater Tool Kit

Project costs were developed based on a simplified Stormwater Tool Kit. A single price was established for the construction of each tool kit component. This component price list was then used to establish the base construction cost for each project. CIP projects which required components that are not included in the Stormwater Tool Kit used a hybrid approach where prices for tool kit components were combined with a more traditional cost estimating procedure. The construction costs were then combined with standardized design, permitting, and mobilization costs based on project size and complexity to come up with a total planning level cost estimate for each project.

Detailed descriptions of the stormwater tool kit tools containing uses, benefits, and cost assumptions are included with this plan in Appendix H.

Construction Costs

Unit costs for construction and materials were drawn from a variety of sources, including bid tabulations from recent water quality facility rehabilitation projects within the City of Hillsboro and City of Beaverton and average bid tabulations from 2018 from the Oregon Department of Transportation (ODOT). Bid tabulations from 2018 were the latest available at the time the cost estimates were developed. From the available data, Otak's engineers used professional judgement to estimate unit prices for each project. The following are descriptions of how project costs were estimated. Table 7 shows how construction costs influence other project costs.

Table 7 Construction Costs by Line Item

Project Unit Costs	How Calculated
Construction Mobilization	10% of total Construction Costs
Erosion and Sediment Control	2% of total Construction Costs
Traffic Control (where needed)	6% of total Construction Costs

Construction Contingency

A contingency based on total construction cost is included in each estimate. Two tiers were established using an inverse correlation. A 30% contingency was applied when total construction costs exceeded \$1 million and 40% was applied when it was less. In some cases, engineering judgement was used to apply an additional 10% contingency.

Utility Conflict Resolution

Costs for Utility Conflict Resolution were included when the proposed improvements were likely to necessitate the relocation of some existing utilities. The costs for this item were estimated using professional judgement based on Otak's design and construction support experience.

Temporary Water Management

Temporary water management is required when working in streams. The estimated cost is based on the extent and duration of in-stream work presented in Table 8.

Table 8 Temporary Water Management

Cost	Description
\$50,000	Project requires a larger or longer bypass system and the duration of in stream construction is longer.
\$25,000	Project requires a small bypass system and the duration of in stream construction is short.
\$10,000	Project requires minimal isolation (i.e., turbidity curtain) and only partial stream isolation.

Additional cost factors include easements or land acquisition, permitting, environmental mitigation, final design, project administration, and construction management.

Easement Acquisition

Acquisition of permanent easements was estimated at \$6.00 per square foot. The administrative costs for easements, including property appraisals, were estimated at \$10,000 per impacted property.

Permitting

Permitting costs depended on both complexity of the permitting requirements and construction costs. All projects were assumed to require a basic level of permitting, which was estimated based on construction cost. Projects which include any portion of the project being located in a natural resource area, such as a wetland, stream corridor, county-designated Water Quality Resource Area (WQRA), or city-designated Natural Resources Overlay Zone (NROZ), were assumed to require additional permitting from state and federal agencies as well as from the City of Happy Valley or Clackamas County. These costs were estimated based on the level of expected impacts to the resource area and the complexity of expected permitting. Assumptions for permitting costs are presented in Table 9.

Table 9 Assumptions for Permitting Costs

Type of Permitting	Project Construction Cost	Estimated Permitting
	Over \$500,000	\$15,000
Basic Permitting	\$100,000 to \$500,000	\$10,000
	Less than \$100,000	\$5,000
	No water quality sensitive permitting	\$0
Permitting in	Major impact to natural resource area	\$50,000
Jurisdictional Waters	Significant impact	\$30,000
	Minor impact	\$15,000

The cost of design effort to bring the project design from conceptual design to final design was calculated as a percentage of total construction costs. Three tiers were established where the design proportion of the total project cost decreases for larger projects as presented in Table 10. In some cases, engineering judgement was used to apply a different percentage.

Table 10 Assumptions for Final Design Costs

Project Construction Cost	Design Percentage
Over \$1.5 million	15%
\$500,000 to \$1.5 million	20%
Less than \$500,000	25%

Project administration incorporates staff time for project management, financial management, and grant management into the estimate. Project administration is assumed to be a percentage of total construction costs, including contingency. Three tiers were established using an inverse correlation as presented in Table 11.

Table 11 Assumptions for Project Administration Costs

Project Construction Cost	Project Administration Percentage
Over \$1.5 million	10%
\$500,000 to \$1.5 million	12%
Less than \$500,000	15%

Section 5. Programs

Program Summaries

Known issues that were similar in scope and approach were grouped in a program approach for resolution. Each of the programs is summarized below and the programs are described in detail in Appendix I.

WES previously included many of the types of activities grouped into programs in its capital project types and was completing some of these efforts. Table 12 below links the previous project types with the recommended programs.

Table 12 SSMP Program Crosswalk

WES Project Types – Prior Capital Improvement Programs	Proposed Change	Recommended Programs
Capital Repairs	Name change and expanded project list	Priority CIP Program
Water Quality Retrofits	Updated and expanded project list, updated costs	Water Quality Retrofits Program
Hydrology Improvement Facilities	Change includes reassessing and redistributing these projects into the new programs, likely into the Priority CIP or the Stormwater Pond Repair/Rehabilitation Program.	N/A
Underground Injection Control Retrofits	Name change and expanded project list	Underground Injection Control Decommissioning/Retrofit Program

WES Project Types – Prior Capital Improvement Programs	Proposed Change	Recommended Programs
Restoration	Expanded project list	Restoration Program
Property Acquisition for Stormwater Benefit	No change	Property Acquisition for Stormwater Benefit Program
n/a	Add new program	Stormwater Pond Repair/Rehabilitation Program
n/a	Add new program	Small Drainage Project Program

Small Drainage Projects

Providing regular maintenance to existing stormwater infrastructure is important to proper asset management. In reviewing the known issues and creating the programs, a subset of nuisance issues of similar nature became clear and were grouped together. Projects correcting nuisance issues are estimated to cost less than \$100,000 each and include small pipe conveyance, upgrading manholes and inlets, and small pipe lining and root removal.

The Small Drainage Projects Program improves drainage issues when flooding is caused by WES-owned stormwater infrastructure. These projects would support WES's goal of proactively addressing performance deficiencies or enhancements and decrease the number of customer service requests.

The known issues analysis identified 32 instances where a new inlet or manhole is needed, three instances of root removal in small pipe, and assumed 3,000 linear feet of 18" (or smaller) pipe that could be installed to address some flooding and ponding issues through a given year. The 32 inlet/manhole replacement locations are shown on Figure 14. Pipe locations are expected to be identified as problems arise and are not shown on the map.

The Small Drainage Project Program is intended to provide steady annual funding so that WES can both reactively and proactively address small flooding and drainage issues in a timely manner. Without this program, damage to roadways or public and private property could result, and public complaints could rise.

The Small Drainage Project Program is expected to be carried out by WES field staff or contractors as the issues arise or once staff sees that a problem area needs addressing to avoid a flooding issue or complaint. Associated costs include project management, mobilization, traffic control, erosion controls, and surface restoration. The completion of current inventory of these projects is expected to cost approximately \$970,000.

Stormwater Pond Repair and Rehabilitation

WES owns or operates 621 stormwater facilities that reduce pollutants in stormwater runoff and/or control flows prior to discharge to a natural wetland, stream, or river. These facilities also help reduce erosive runoff, or drainage hydromodification, in stream channels.

Of those facilities, 58 are currently in need of repair or rehabilitation based on information provided by WES and the City of Happy Valley, and in some cases verified by Otak inspections. The 58 sites are shown on Figure 15. WES currently has allocated \$250,000 per year through FY 2023 for Detention Facility Repair/Rehab to return detention facilities to their original design function. This typically funds five or six facility rehabilitations per year, which are bid to contractors. Generally, these facilities need routine

inspection and maintenance, as well as eventual rehabilitation, to ensure functionality and maximize their useful life.

The Stormwater Pond Repair and Rehabilitation Program would provide a clear budget line for these assets that are critical to meeting water quality goals and to protecting conveyance infrastructure downstream. In order to repair and rehabilitate 63 stormwater facilities and stay ahead of asset management needs, WES could elect to complete this work over five years. The SSMP assumes one additional facility per year will need rehabilitation or repair in addition to the 58 facilities already identified.

Associated costs include project management, mobilization, traffic control, erosion controls, and surface restoration. The repair and rehabilitation of 63 facilities (58 identified plus one/year for five years) is expected to cost approximately \$4.1 million. To keep up with maintenance needs, WES should provide funding for repair and rehabilitation of 10% of all facilities every five years.

Water Quality Retrofits

Water quality retrofits generally include new facilities in unserved areas or enhancements which add or increase water quality treatment within existing stormwater infrastructure. New facilities serving existing impervious surfaces may be placed in the right-of-way or on public property. Enhancements of existing facilities could include installation of cartridge filter systems, conversion of swales to rain gardens or wet ponds, and other improvements to stormwater facilities or conveyance systems where water quality treatment is either inadequate or can be significantly improved. The Water Quality Retrofit Program would add a new water quality retrofit where a clear benefit to a nearby stream has been identified and there is sufficient space for installation. The existing known issues list identified eight potential areas for water quality retrofits. The program recommendations include implementation of three types of retrofits: large stormwater ponds, stormwater planters in the right of way, and vegetated swales.

To complete the retrofits identified in the known issues plus an additional retrofit at a location to be identified in the future, WES should plan to complete one large stormwater pond (20-acres treatment capacity), five right-of-way stormwater planters (3,000 square feet treatment capacity), and three vegetated swales (one-acre treatment capacity). The sites are shown on Figure 16. The completion of these water quality retrofits is expected to cost approximately \$1.7 million.

Restoration and Property Acquisition

WES puts a high value on stream restoration, habitat improvement, and floodplain management and sees these actions as part of its mission to protect and improve water quality. These projects maximize the ecological and stormwater benefits of properties and support numerous local and regional environmental goals. For the purposes of this program summary, restoration and property acquisition can include instream restoration, riparian revegetation, culvert replacement or repair for fish passage, and property acquisition.

According to watershed action plans for Rock Creek and Kellogg/Mount Scott Creeks, the main challenges for these waterbodies include poor fish passage, changes to aquatic habitat conditions, flooding risks, lack of riparian vegetation, in-stream erosion and down cutting, and water quality concerns. The known issues list includes 13 locations where restoration and property acquisition projects would address these challenges. The SSMP recommends an annual baseline funding allocation to put toward restoration, revegetation, and culvert replacement efforts, as well as an allocation of funding spread across a five-year period for property acquisition that would support restoration efforts. The restoration and property acquisition program would fund the following types of activities:

- In-stream habitat improvement such as channel enhancements or stabilization, or floodplain reconnections.
- Streamside property acquisition to protect existing valuable habitat from alteration.

- Culvert replacement or repair to re-introduce habitat to fish that had been previously cut off due to culverts that prevented passage.
- Revegetation of streamside properties to improve habitat for fish and aquatic invertebrates.
- Streamside property acquisition to protect existing valuable habitat from alteration.

The restoration and property acquisition program is expected to cost approximately \$825,000 a year or \$8.2 million over ten years.

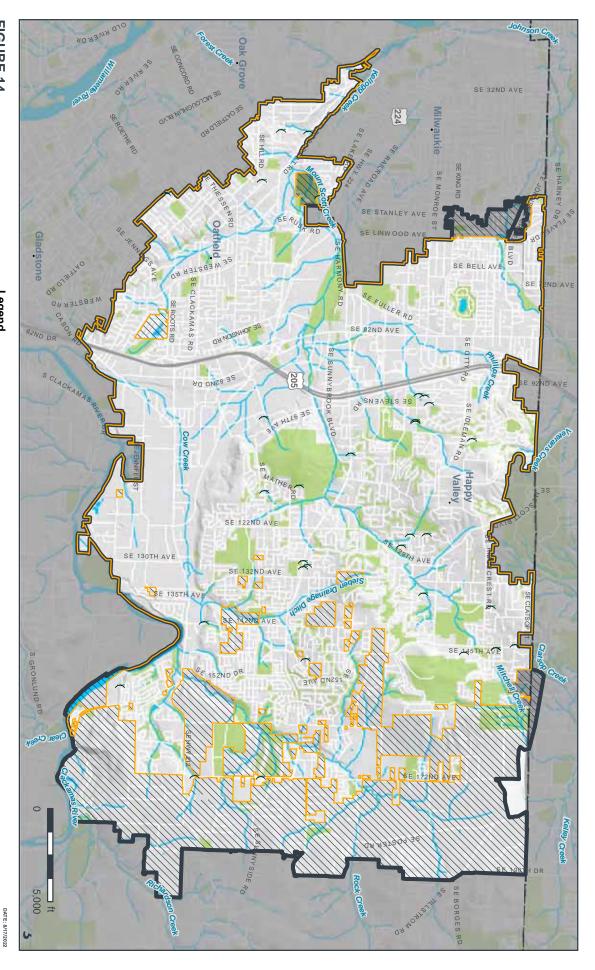
Underground Injection Control Decommissioning and Retrofits

Underground Injection Controls (UICs) are systems that place fluids below the ground. UICs for stormwater are most commonly used where connections to piped storm system infrastructure are not available and where drainage can accommodate infiltration. Common types of UICs include drywells or sumps that receive stormwater runoff from roofs, parking lots, or street surfaces. UIC's are regulated under the Safe Drinking Water Act and must be registered with DEQ. In 2018, WES developed cost estimates for decommissioning or retrofitting ten UIC locations that do not adequately protect drinking water quality. Since that time, one location has been decommissioned. WES has prioritized addressing UIC compliance requirements through a risk-based approach. The known issues list includes nine UICs that intersect with high seasonal groundwater at least one day a year. Each UIC would need to be either decommissioned or retrofitted. To decommission the nine identified UICs will cost approximately \$530,000. Priority locations are mapped on Figures 17 and Figure 18.

Program Cost Summary

Planning level cost estimates were prepared for each program and each program total is the cost to complete all currently identified issues. Program costs were estimated using the Stormwater Tool Kit, recent construction costs, and Otak engineering estimates to develop project and unit costs (see Section 4 for additional information on cost estimating methodology and sources). Within the Restoration and Property Acquisition Program, an annual baseline funding is recommended to allow flexibility given the range and scope of potential projects. Each program cost estimate includes construction costs, associated costs, and staff costs. Costs are presented in 2020 dollars.

See Table 13 for a summary of program cost estimates over a ten-year planning horizon, and detailed program cost estimates are included in Appendix I.



SMALL DRAINAGE PROGRAM INLET & MANHOLE REPLACEMENT SITES WES STORM SYSTEM MASTER PLAN CLACKAMAS COUNTY, OR

Legend

(Inlet/Manhole Replacements SSMP Planning Area

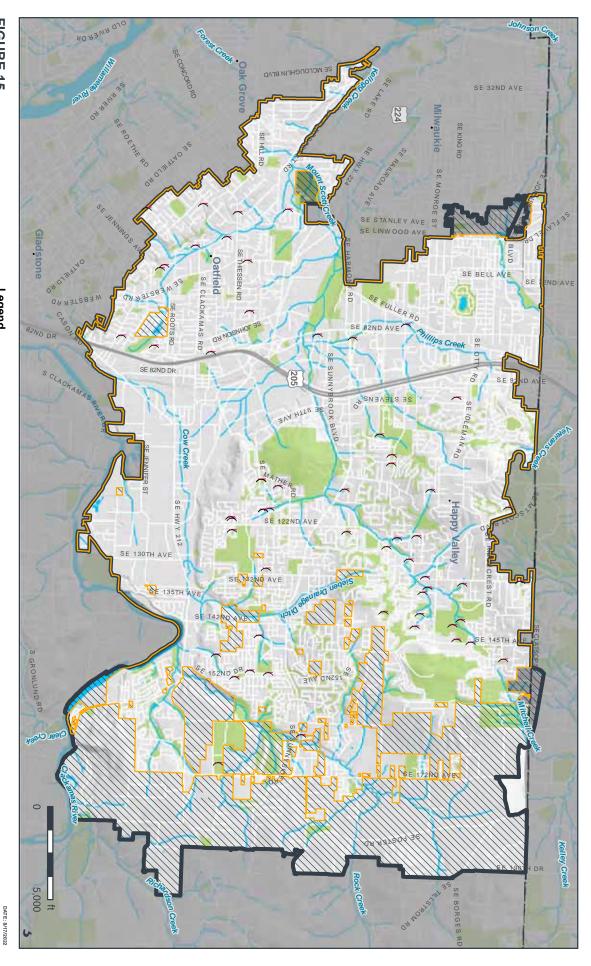
// Outside WES Service Area

WES Service Area

Outdoor Recreation and Conservation Areas

WATER ENVIRONMENT SERVICES





CLACKAMAS COUNTY, OR STORMWATER POND REPAIR WES STORM SYSTEM MASTER PLAN **AND REHABILITATION** FIGURE 15

Legend

SSMP Planning Area (Repair / Rehab Program Sites

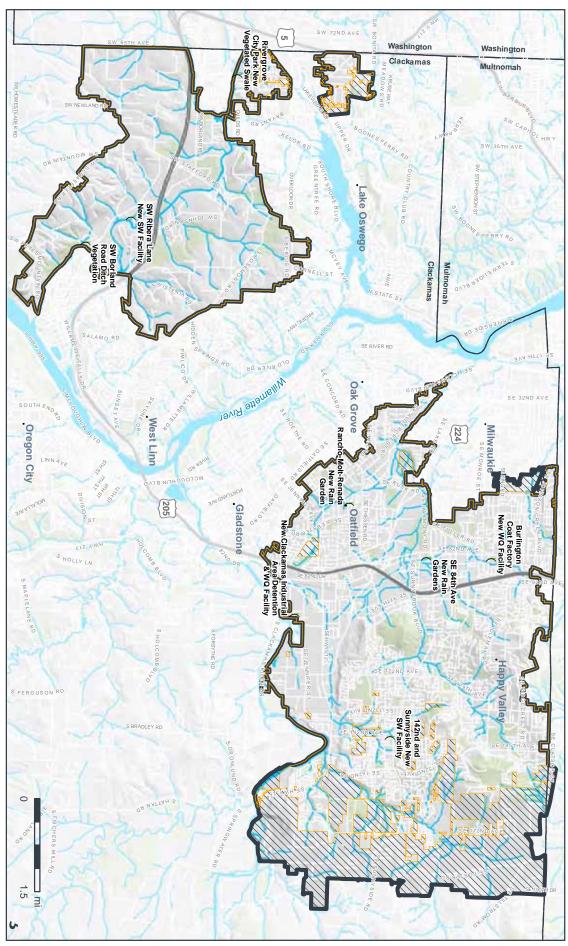
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WES Service Area

Outdoor Recreation and Conservation Areas

WATER ENVIRONMENT SERVICES

NOTE: THIS DATA IS NOT A SURVEY AND IS MEANT FOR PLANNING PURPOSES ONLY. DATA IS PROVIDED BY ESRI, WES, AND METRO RLIS. L:\PROJECT\19100\19109\CADD\GIS\MXDS\MASTER PLAN REPORT MAPS\FIG_STOR\MVATERFACILITYREPAIRREHAB.MXD



CLACKAMAS COUNTY, OR **RETROFIT PROGRAM LOCATIONS** WES STORM SYSTEM MASTER PLAN WATER QUALITY

SSMP Planning Area

FIGURE 16

Stream/Waterbody

// Outside WES Service Area

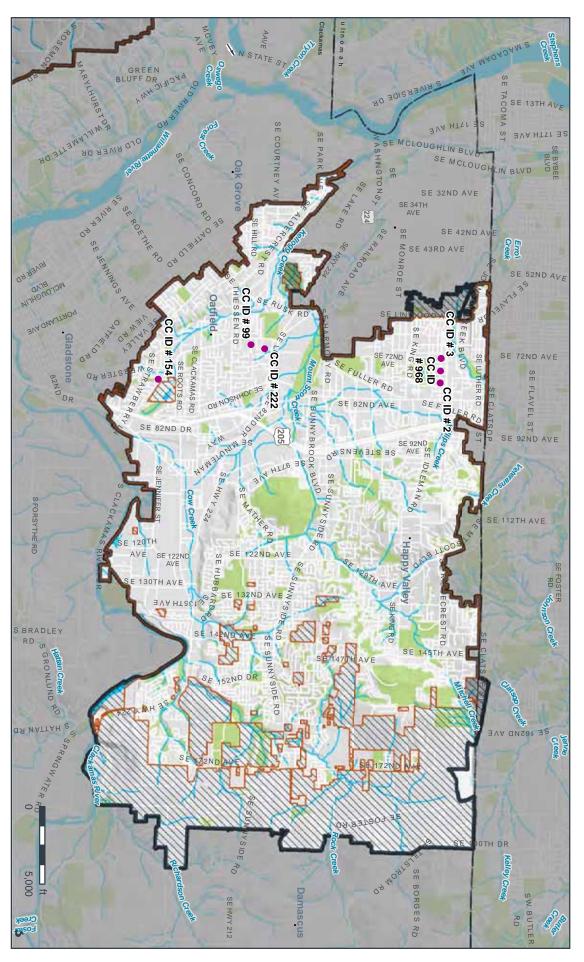
WES Service Area

Water Quality Retrofit

WATER ENVIRONMENT SERVICES

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DATE: 8/17/2022



CLACKAMAS COUNTY, OR WES STORM SYSTEM MASTER PLAN **WES SERVICE AREA 2 UIC DECOMMISSIONING / RETROFIT PROGRAM** FIGURE 17

Legend

WES Planning Area ! Priority UICs

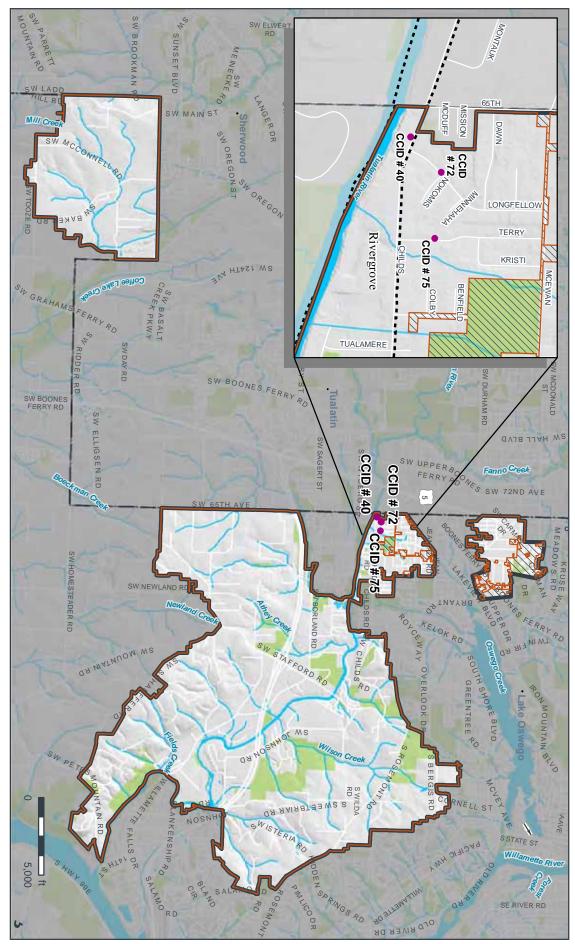
WES Service Area

// Outside WES Service Area

Outdoor Recreation and Conservation Areas







CLACKAMAS COUNTY, OR WES STORM SYSTEM MASTER PLAN **WES SERVICE AREA 3 UIC DECOMMISSIONING / RETROFIT PROGRAM** FIGURE 18

Legend

WES Planning Area ! Priority UICs

WES Service Area

// Outside WES Service Area

Outdoor Recreation and Conservation Areas





DATE: 7/11/2022

Table 13 Summary of Program Cost Over Ten Years, Including CIP (in 2020 \$)

Table 10 Cullinary of Freguent Cost Cycl. For Fours, including on (in £020 y)	9	gala, iliciu	all g	(11 20	(4)										
	Total	Total Program							Annual Cost (Rounded)	ınded)					Program Scope
Program		Cost	Duration		FY1	FY2	FY3	FY4	FY5	FY6	FY7	FY8	FY9	FY10	Quantity Unit
1. Small Drainage Project Program															
New Large Birdcage Inlet or Manhole	₩.	276,480	10	₩.										27,600	34 Structures
Small Conveyance	45	567,000	10	45	56,700 \$							56,700 \$		56,700	3000 Linear Feet
Root Removal/Pipe Lining	s	128.426	10	s	12,800 \$	12,800 \$	12,800 \$	12,800 \$	12,800 \$	12,800 \$	12,800 \$	12,800 \$	12,800 \$	12,800	3 Known Issues
Program Cost	s.	971.906		s	97,100 \$	97,100 \$	97,100 \$	97,100 \$	97,100 \$	97,100 \$	97,100 \$	97,100 \$	97,100 \$	97,100	
	,														
2. Stormwater Facility Repair/Rehabilitation Program	\$	4,114,951	10	\$	411,000 \$	411,000 \$	411,000 \$	411,000 \$	411,000 \$	411,000 \$	411,000 \$	411,000 \$	411,000 \$	411,000	63 Facilities
3. Water Quality Retrofit Program															
Large Stormwater Pond (20 acres treated)	s	1,080,288	10	\$	110,000 \$	110,000 \$	110,000 \$	110,000 \$	110,000 \$	110,000 \$	110,000 \$	110,000 \$	110,000 \$	110,000	1 Pond
Stormwater Planter in the ROW (3000 SF treated)	45	236,250	5	\$					47,300						5 Planters
Vegetated Swale (1 acre treated)	45	407,722	10	\$	41,000 \$	41,000 \$	41,000 \$	41,000 \$	41,000 \$	41,000 \$	41,000 \$	41,000 \$	41,000 \$	41,000	3 Swales
Program Cost	\$	1,724,260		s	198,300 \$	198,300 \$	198,300 \$	198,300 \$	198,300 \$	151,000 \$	151,000 \$	151,000 \$	151,000 \$	151,000	
4. Capital Projects (current estimate)	₩	21,963,759	10	₩.	1,339,000 \$	2,140,000 \$	2,153,000 \$	2,100,000 \$	2,151,000 \$	2,054,000 \$	2,100,000 \$	2,165,000 \$	2,139,000 \$	3,623,000	12 Projects
5. Restoration and Property Acquisition Program															
Box Culvert	⟨\$	1,565,088	10	45										157,000	5 Culverts
Riparian Revegetation	45	162,000	10	\$	16,200 \$							16,200 \$		16,200	2 Known Issues
Instream Restoration (Baseline Funding)	\$	5,000,000	Annual	₩.										500,000	not estimated
Property Acquisition for Habitat (Baseline Funding)	\$	1,500,000 \$	\$750K/5yrs	\$	150,000 \$	150,000 \$	150,000 \$	150,000 \$	150,000 \$	150,000 \$	150,000 \$	150,000 \$	150,000 \$	150,000	not estimated
Program Cost	s	8,227,088		45	823,200 \$	823,200 \$	823,200 \$	823,200 \$	823,200 \$	823,200 \$	823,200 \$	823,200 \$	823,200 \$	823,200	
6. UIC Decommissioning/Retrofit Program															
Tier 1 - < 0' groundwater separation	45	528,412	10	\$	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000	10 Tier 1 UIC Retrofits
Program Cost	45	528,412		45	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000 \$	53,000	
7. Emergency Repairs	\$	1,000,000	Annual	\$	100,000 \$	100,000 \$	100,000 \$	100,000 \$	100,000 \$	100,000 \$	100,000 \$	100,000 \$	100,000 \$	100,000	not estimated
TOTAL PROCESSA COCTO	>	20 220		>						200	2		2		
CONTRACTOR COSTS	4	30,330,370		4	J,022,000 7	2,022,000	7	2,104,000	2,000,000	2,002,200	4 000,000	2,000,000	٧ ٥٥٥ ټارو	3,20,300	

Section 6. Policy Discussion

As part of the WES SSMP, Otak developed white papers to advance policy development or strategic planning around issues and challenges facing WES. the following topics were selected during the visioning workshops:

- Regional Stormwater Facility Implementation Strategy and Toolbox.
- Identifying Public Storm System Extension Opportunities.
- Stormwater Banking.

Each paper is summarized below, and the full text is of each is provided in Appendix J.

Each of these papers addresses challenges facing WES's ability to meet its goals.

Regional Stormwater Facility Implementation Strategy and Toolbox

The Pleasant Valley/North Carver (PVNC) area was recently brought into Happy Valley's urban growth boundary. By state law, a community Comprehensive Plan for the area must be completed before redevelopment of the area can occur. The Comprehensive Plan includes planning for infrastructure including stormwater management. The City has many creeks and streams that will be impacted by development if stormwater runoff is not carefully managed.

WES and Happy Valley identified managing stormwater using regional stormwater facilities as efficient and desirable from an overall land availability and long-term operations perspective, and potential locations for regional ponds were identified and sized to provide treatment and detention for the development of the planned land uses.

A regional stormwater facility is typically described as a large stormwater management solution strategically situated and designed to serve multiple properties or subdivisions in order to optimize stormwater management as part of a development project. Regional facilities provide several advantages to jurisdictions and developers:

- Lower design and construction costs. One or two regional stormwater facilities could be much more cost-effective to implement than multiple individual onsite structural controls.
- Reduced operation and maintenance costs. Jurisdictions can more cost-effectively manage operations and maintenance for fewer facilities. Fewer sites also increase the likelihood that maintenance activities are carried out regularly for both public and private operators.
- Visibility. Regional stormwater facilities have high visibility due to their size making them more likely
 to be maintained. This also engages the community to understand the purpose and benefits of the
 regional stormwater facility, and stormwater management in general.
- Higher utilization of developable land. Developers can maximize the developable land by minimizing the land normally set aside for the construction of stormwater controls.
- Community benefits. Well-designed regional stormwater facilities can serve as educational, recreational, ecological, and aesthetic amenities for a community.

While the use of regional facilities provides advantages for managing stormwater, implementation presents challenges including:

• **Size and Siting.** One or several regional stormwater facilities may be difficult to site depending on the size, and particularly in infill development.

- Sequencing and Funding. Coordinating the regional stormwater facility and related conveyance systems can be complicated depending on the number of property owners and developers involved, as well as the topography.
- Time and Schedule. Successfully implemented regional stormwater facilities typically completed rigorous planning, as well as reviewed options for funding, and possible permitting requirements. Additionally, land acquisition or easements must be in place before development can begin.

While these challenges have been overcome in other areas, Clackamas County has previously had mixed results at implementing a regional facility approach. New policies and procedures will be required to allow implementation of this regional approach. Otak prepared the *Regional Stormwater Facilities White Paper* to examine possible tools and strategies for successful implementation of regional stormwater facilities in the PVNC area.

Identifying Public Storm System Extension Opportunities

The purpose of this white paper is to identify portions of the planning area for the WES SSMP that may not have access to storm system infrastructure. A lack of public storm sewer conveyances may present a barrier to development or redevelopment, and areas without sufficient infrastructure may drain poorly or not at all. In order to create plans and budget projections, WES can analyze the service district area and identify areas in need of new or upgraded storm system infrastructure.

As a first step, Otak developed a simple web-based mapping tool and methodology so that WES can locate these areas, assess the extent of the issues, and see adjacent infrastructure, as well as land use, zoning, and other helpful data on one map. The mapping application was created using ArcGIS Online Web App Builder. The map is hosted online and does not require an ArcGIS license to access or view the map. This tool can be replicated and easily maintained for WES's use to drive policy initiatives, assist community development and planning staff, and prioritize capital projects.

The white paper (Appendix J) describes the tool, the methodology, and the result of the initial analysis. It also provides information on how to maintain the map data and further analysis that could be completed in the future. This map encompasses the planning area of the SSMP, including Service Areas #2 and #3 and adjacent planned growth areas. A description of the analysis and key results are below. The white paper contains further information on the maintenance and future use of the web map as well as a map of areas where public storm system extension opportunities may exist.

Results

Tax lots were classified by proximity to a public storm conveyance system as follows:

- Well Served. Directly served by the existing storm system within 100 feet.
- Adequately Served. Within 100 to 200 feet.
- Potential Public Storm System Extension Opportunity. Private residential property with a lot line more than 200 feet away from a public storm system conveyance.

A minimum threshold of 200 feet was selected as distances of under 200 feet can typically be addressed with lateral extensions or minor sewer extensions as a condition of development. Distances beyond 200 feet would require a larger public works improvement to provide sewer within a reasonable distance for a property to be connected by service laterals.

The mapping analysis revealed that the majority of Service Area #2 is well served but revealed distinct clusters of where public storm system extension opportunities may exist. These areas were reviewed, and four were found upon more detailed investigation to have sufficient stormwater controls or service. Two areas are recommended for future study and planning to determine if public storm system extension opportunities may exist or if the analysis indicates future risk.

- 1. The northern area of the Kellogg Creek basin on the edge of the service district. It appears this area is a public storm system extension opportunity due to steep grades and is a densely forested area. This area is approximately 25 acres and includes 24 tax lots that are zoned R10 (residential). Properties may drain via private outfall to creek systems or have onsite drywells. Additional research is recommended to determine how properties are currently managing drainage and stormwater.
- 2. Western and central areas of North Clackamas Revitalization Area (NCRA). This is a known problem area for WES in terms of storm system infrastructure and was an expected result of the analysis. This area is approximately 25 acres and includes 122 tax lots that are zoned R7 (residential). While this result validates the approach and the results, additional research is recommended to determine how properties are currently managing drainage and stormwater.

One of the rating criteria for selecting projects for the Capital Improvement Plan (CIP) is whether the potential project provides new drainage or stormwater management to an underserved area. Based on this analysis, three potential CIP projects were given a score for this criterion, and two listed below were selected for the CIP program:

- PPID #1606, NCRA Stormwater Plan. Clackamas County hopes to encourage development in NCRA by improving and updating infrastructure. This analysis shows that there is a need for new storm water infrastructure (in addition to the planned retrofitting) in NCRA.
- PPID #1322, SE 172nd Ditch Conveyance Improvement. The SE 172nd Ditch Conveyance Improvement project is an under-capacity ditch in the Pleasant Valley/North Carver area. It is currently outside WES jurisdiction, but it is expected to be annexed into WES in the near future.

Stormwater Banking

All development that results in 5,000 square feet or more of new impervious surface and/or a modification of existing impervious surfaces is subject to the stormwater management standards for water quality treatment, infiltration/retention, and quantity/flow control. These requirements apply within Service Areas #2 and #3.

For some transportation projects that exceed the 5,000 square foot threshold, it is often cost prohibitive to design and construct stormwater facilities that meet the standards within the project area. This is most commonly an issue on smaller transportation projects that occur within relatively narrow right-of-way corridors. For these projects, the cost to acquire right-of-way from adjacent landowners, the engineering design and construction costs of a stormwater facility, or creating small, dispersed stormwater facilities through the entire project area would likely make the overall project infeasible to complete. Projects that only involve sidewalk or curb ramp improvements are common project types where it can be difficult to meet the current standards.

WES would like to review approaches for developing a stormwater credit or trading program for DTD and City of Happy Valley transportation projects to provide additional flexibility in meeting stormwater management goals. Stormwater credit or trading can help ensure that no net negative impact occurs from project implementation. The desired outcomes of the stormwater credit program will be to foster development of stormwater management solutions that provide protection to surface waters while reducing the costs of implementation on a specific project basis.

While the terms stormwater credits, banking, or trading are often used interchangeably, each term has a distinct meaning. The overall concept recognizes that stormwater facilities have a quantifiable benefit that can be commodified. Stormwater facility capacity, in this case for water quality treatment, is the good being purchased. A stormwater facility with extra capacity generates a benefit, or "credits," that can be sold, or "credited" to other projects. A project can also purchase stormwater credits prior to a specific

stormwater facility being built. Proactive installation of stormwater facilities creates a "bank" of "stormwater credits" (aka "banking") for future purchase.

The tracking and documentation of this credit transfer (or "trading") ensures that the project and the stormwater facility are both eligible given predetermined standards. For the purposes of this white paper, the term stormwater credit will be used to describe the water quality capacity generated by a stormwater facility. The term stormwater banking will describe existing stormwater facilities that have available credits.

Section 7. Implementation Plan

The WES Storm System Master Plan (SSMP) is the first plan undertaken since WES began providing storm and surface water management services to the former service areas of the Surface Water Management Agency of Clackamas County (SWMACC) in 2017 and Clackamas County Service District No. 1 (CCSD1) in 2018. WES identified the development of a master plan as a strategic initiative to support Clackamas County's Performance Clackamas goals. The purpose of the SSMP is to create a framework for storm system infrastructure operations, maintenance, and expansion to improve the quality of surface water in the WES service areas. The SSMP goals are to address system deficiencies, support redevelopment, accommodate new growth, extend the service lives of existing assets, and improve water quality protection.

The SSMP provides short- and medium-term recommendations for capital improvements, programmatic system improvements, and long-term guidance in evaluating storm system needs to advance that strategic initiative. A ten-year construction plan with cost estimates is a cornerstone of the plan. A series of programs consolidate minor improvements into larger initiatives to address surface water needs. This implementation plan attempts to provide focus and to establish priorities for the near term and the next ten years. All of the recommendations build on areas of practice already engaged in by WES.

The implementation plan may be used as a standalone document, so it repeats some information provided in other sections of the SSMP.

Stormwater Program Priorities

The SSMP recommendations were compared against each other and WES's goals and available funding to determine relative priority. The priority assigned to any given program or project may change over time as partnership opportunities or changes in regulation or community values emerge. A summary comparison of all program recommendations is provided in Table 14. WES could initially focus on the four high priority programs over the next couple of years. Additionally, WES should study existing revenues and potential funding sources to identify the resources needed to fully implement the recommended programs and projects.

Table 14 Summary of Recommended Stormwater Programs

Program	Priority	Driver	Cos	st
1 Togram	THOTILY	Dilvei	Total	Annual*
Small Drainage Project Program	High	Service Driven	\$971,906	\$97,100
Stormwater Pond Repair / Rehabilitation Program	High	Compliance and Service Driven	\$4,114,951	\$411,000
Water Quality Retrofit Program	High	Service Driven	\$1,724,260	\$172,000

Program	Priority	Driver	Cos	st
Frogram	FIIOTILY	Dilvei	Total	Annual*
CIP Projects**	High	Service Driven	\$21,963,759	\$2,196,000
Restoration and Property Acquisition Program	Medium	Service Driven	\$8,227,088	\$823,200
UIC Decommissioning / Retrofit Program	Medium	Compliance Driven	\$528,412	\$53,000
Emergency Repairs	Medium	Service Driven	\$1,000,000	\$100,000
		Total	\$38,530,376	\$3,852,000

^{*} Annual costs are averaged in this table and are based on a ten-year plan.

Policy Initiatives

In addition to funding these recommended programs and projects, WES should continue study and implementation of the recommendations in the policy areas identified by WES as priorities:

- Regional Stormwater Facility Implementation Strategy and Toolbox.
- Identifying Public Storm System Extension Opportunities.
- Stormwater Banking.

Each policy is described further in Appendix J.

Regional Stormwater Facility Implementation Strategy and Toolbox

WES should consider pursuing the key steps identified to successfully implement a regional approach for stormwater management. These steps consist of creating stormwater plans, writing codes that encourage regional facilities, and providing developers with guidelines and minimum standards. The PVNC comprehensive plan area could be the first area in which to focus this policy.

Identifying Public Storm System Extension Opportunities

A lack of public storm sewer conveyances may present a barrier to development or redevelopment, and areas without sufficient infrastructure may drain poorly or not at all. As part of the SSMP, a simple webbased mapping tool and methodology were developed to locate Public Storm System Extension Opportunities, assess the extent of the issues, and view adjacent infrastructure, as well as land use, zoning, and other helpful data.

The tool contributed to the selection of two priority CIP projects included in this implementation plan: CIP ID #1606, NCRA Stormwater Plan and CIP ID #1322, SE 172nd Ditch Conveyance Improvement. WES could continue to proactively plan storm sewer extension or upgrades in these areas if policy direction supports this endeavor.

WES could also use the web map as a tool for other analysis such as to analyze the distribution of detention ponds, to determine the relationship between stormwater infrastructure and indicators of poverty or inequality, or to conduct more detailed tax lot-based analysis.

Stormwater Banking

WES may consider developing a stormwater credit or trading program for Clackamas Department of Transportation and Development (DTD) and City of Happy Valley transportation projects if policy direction supports this endeavor. DTD and the City of Happy Valley would be the primary beneficiaries of a program such as this, and it could strengthen relationships between WES and those agencies

^{**} Includes both existing planned and new CIPs

Implementation Phases

Existing Stormwater Success

WES has been successful operating its storm system and responding to urgent or emergency flooding and system failures, such as collapsed detention pipes. In the 2020-2021 and 2021-2022 fiscal years, WES has budgeted more than \$3 million in its surface water CIP, including the following project types: capital repairs, water quality retrofits, hydrology improvement facilities, UIC retrofits, restoration, and property acquisition for stormwater benefit. Highlights of upcoming projects and projects completed beginning in 2019 include:

- Carli Creek Water Quality project, completed in 2019.
- Small Drainage Repair Projects completed in 2020, including Knee Court, Mt. Sun Detention Pond, and Highland View Estates.
- SE 106th Outfall Conveyance System project, completed in 2020.
- Mt. Scott Trail Stormwater Repair project, construction to be complete in 2022.
- Replace storm sewer inlets to reduce localized flooding on SE 93rd and 95th Courts, SE Solomon Court, and SE 130th and Sunnyside streets, construction in 2022.
- 3-Creeks Floodplain Enhancement project, in design.

High Priority (Near Term) Programs

By allocating increased budgets to the Small Drainage Project Program and the Stormwater Pond Repair / Rehabilitation Program, WES may begin reducing the number of urgent or emergency drainage and stormwater pond repairs and shifting to a more proactive and preventive approach. This type of shift is expected to require focus and may take a number of years to come to fruition. It is not expected that urgent or emergency situations will disappear, and WES should continue to fund the Emergency Repairs program, which is included in the Medium Priority Programs section, below.

Small Drainage Project Program

The Small Drainage Project Program is intended to provide steady annual funding so that WES can both reactively and proactively address small flooding and drainage issues in a timely manner. This program category includes nuisance issues, such as blockages of small pipes by roots, degradation of small pipes, and minor flooding due to clogged or degraded inlets or missing small pipes. This program would manage repairs and upgrades that are too large for routine maintenance and are estimated to cost less than \$100,000 each. The projects will improve drainage issues when flooding is caused by WES's stormwater infrastructure and would support WES's goal of proactively addressing performance deficiencies or enhancements and decreasing the number of customer service requests. The Small Drainage Project Program aligns well with WES's goal to focus limited resources on the most pressing concerns and the most cost-beneficial solutions (Water Environment Services, 2020).

Stormwater Pond Repair / Rehabilitation Program

The Stormwater Pond Repair and Rehabilitation Program will provide a budget line for repairing stormwater quality and flow control facilities. Stormwater facility maintenance is required by the Clackamas Group NPDES Permit (municipal stormwater permit) issued to WES and jurisdictions in Clackamas County. WES owns or operates stormwater facilities that reduce pollutants in stormwater runoff and prevent erosive runoff in stream channels. New development requirements will generate more stormwater facilities needing ongoing maintenance. The existing known issues includes 58 stormwater facilities that currently need repair or rehabilitation. Detention pipes appear to cause a notable proportion of emergency repair needs, so in implementing this program, WES could prioritize detention pipes whenever possible. The Stormwater Pond Repair / Rehabilitation Program aligns well with WES's goal to focus limited resources on the most pressing concerns and the most cost-beneficial solutions (Water Environment Services, 2020).

Water Quality Retrofit Program

The Water Quality Retrofit Program will add water quality retrofits in existing developed areas. Water quality retrofits generally include new facilities in unserved areas or enhancements which add or increase water quality treatment within existing stormwater infrastructure. The existing known issues list identified nine potential areas for water quality retrofits. Water quality retrofits are among the most popular projects among the public. They are well aligned with WES's goals to minimize the degradation of receiving waters from impacts of stormwater runoff in existing developed areas and to prioritize projects with the greatest potential to support multiple programs and goals, including local and regional fish recovery, habitat enhancement, and water cleanup goals (Water Environment Services, 2020).

CIP Projects

An outcome of the SSMP process is a repeatable methodology for rating, ranking and prioritizing capital projects. The methodology uses criteria that reflect the WES's values.

The final Stormwater CIP includes the ten project recommendations as well as two projects already in progress summarized in Table 15. Figure 12 (above) is a map of the new projects. Several factors can influence the actual implementation sequence including financial constraints and partnership opportunities. The priority ranks are a relative guide.

Priority CIP Projects

Table 15 Priority CIP Projects by Rank

Rank*	CIP No	Name	Cost
Existing	CIP		
1	1124	3-Creeks Floodplain Enhancement Project	\$3,600,000
3	1413	SE Valley View Terrace Conveyance (stormwater portion only)	\$3,227,958
Planned	CIP		
2	1005	SE Wildlife Estates Dr Ditch Inlet & Upstream Detention	\$1,679,470
4	1079	Aldercrest Culvert Replacement & Kellogg Creek Restoration	\$1,865,013
5	1606	NCRA Stormwater Plan	\$5,144,850
6	1055	Thiessen Culvert Replacement & Kellogg Creek Restoration	\$801,635
7	1406	Sunnyside Place Culvert Replacement & Stream Restoration	\$573,623
9	1416	Idleman Conveyance	\$1,394,900
11	1322	SE 172 nd Ditch Conveyance Improvement	\$88,800
13	1091	SE Clackamas Road Drainage Infrastructure	\$508,400
14	1098	Rose Creek New Detention Pond and Instream Restoration	\$2,589,010
15	1125	Aldercrest and Rusk Drainage Improvement	\$440,100
Total			\$21,963,759

^{*} The final ranking indicates a relative priority but does not necessarily represent the order of implementation.

Other Potential CIP Projects

Other projects on the potential projects list could be reconsidered at a later date for inclusion in the Stormwater CIP. A list of projects is provided in Table 16 for future consideration.

Table 16 Summary of Stormwater Capital Projects and Capital Programs for Future Consideration

CIP No	Name	Score
1306	Solomon Court Culvert/Fill Removal & Creek Restoration	52.5
1089	Parmenter Culvert Replacement & Kellogg Creek Restoration	51.0
1028	130th/135th Ave Outfall/Stormwater Treatment Facility	50.0
1503	Clackamas High School Cattle Field Conveyance	45.0
1325	Hamilton Ln Drainage and Pond Rehab	44.0
1013	Mabel Ave Swale Sedimentation	42.5
1023	Emerald Loop Drainage Swale Rehab	41.0
1017	Pipe Rehabs: Spring Mountain, Cavalier, Mystery Springs	40.5
1136	Echo Valley Meadows Restoration Phase 2	40.0
1021	Mountain Gate Road Conveyance	38.5
1003	SE 147th Ave. Conveyance	37.0
1320	Regency View & 137th Hillside Inlet Improvements	35.5
1505	SE Boyer Dr Parking Lot Pipe Replacement	35.5
1321	SE 162nd Culvert Replacement	33.0
1608	SE 145th at Mount Scott Creek Conveyance	32.5
1411	SE Aldercrest Loop & Willow Lane Conveyance	31.5
1507	Safeway Distribution Center ROW Conveyance	30.5

Medium Priority Programs

Restoration and Property Acquisition Program

WES puts a high value on restoration, habitat improvement, and floodplain management and sees these types of projects as part of its mission to protect and improve water quality. These projects maximize the ecological and stormwater benefits of the properties, supporting numerous local and regional environmental goals. Many streams and rivers in the planning area are stressed by combinations of increases in impervious area, poor fish passage, increased stormwater runoff and flooding risk, poor riparian vegetation cover, in-stream erosion, and water quality degradation.

To fund restoration and property acquisition which may help alleviate some of these conditions, the SSMP recommends an annual baseline funding allocation to put toward restoration efforts, as well as an allocation of funding every five years for property acquisition that would support restoration efforts. With many project specifics unknown, this was the preferrable way to estimate costs than assigning a cost per project.

UIC Decommissioning / Retrofit Program

WES owns and operates underground injection controls (UICs) and administers the Water Pollution Control Facilities (WPCF) permit issued by DEQ to the former CCSD1, SWMACC, and the TCSD. Under the WPCF permit, stormwater injection devices are required to be operated in a manner which protects groundwater quality. To meet this requirement, WES adheres to the System-Wide Assessment (SWA) and Underground Injection Control System Management Plan (UICSMP) submitted to DEQ in accordance with the WPCF permit.

The SSMP recommends funding the nine projects listed in Table 17 to protect water quality. The recommendation for this Program is to continue the ongoing work WES has already begun. The locations

of these nine projects are illustrated above on Figure 17 and Figure 18 (above). Additionally, there are private property UICs and/or UICs near drinking water wells that WES may want to retrofit with treatment.

Table 17 Priority UICs

Service Area	UIC ID	Groundwater Separation	Action
#2	2	- 1.20	Shallow existing and add new UIC
#2	3	- 6.65	Shallow existing and add new UIC
#2	99	- 0.35	Shallow existing and add new UIC
#2	154	- 1.05	Shallow existing and add new UIC
#2	222	- 0.76	Shallow existing and add new UIC
#2	968	- 7.07	Shallow existing and add new UIC
#3	40	- 12.08	Decommission; replace with perforated pipe
#3	72	- 0.51	Decommission; replace with perforated pipe
#3	75	- 0.57	Shallow existing and add new UIC

Emergency Repairs

WES anticipates a certain level of emergency infrastructure repair will be required annually. These projects are similar to the projects included in the Stormwater Pond Repair / Rehabilitation Program; however, these projects are the result of new damage or unknown issues which require more urgent mitigation due to the immediate threat to safety or property. Currently WES does not budget for emergency repairs, and funds are redirected from other programs when needed. WES should budget \$100,000 annually to perform minor emergency repairs.

Pleasant Valley/North Carver Stormwater Infrastructure Plan

The PVNC area was recently brought into Happy Valley's urban growth boundary, and a Community Plan for the area must be completed before redevelopment of the area can occur.

Preliminary sizes and locations were developed for 14 regional stormwater facilities in the Pleasant Valley/North Carver District using the WES Best Management Practice (BMP) Sizing Tool. The pond sizes range from 0.4 acres to 2.1 acres, including area for maintenance access and freeboard, and they are each less than 2.2% of the area of the basin that drains to them.

A cost estimate was prepared for each of the regional stormwater ponds and the North Carver Waterfront District conveyance system. The total estimated cost for regional stormwater infrastructure included for the PVNC area is summarized in Table 18.

Table 18 PVNC Regional Stormwater Infrastructure Total Cost Summary

Туре	Costs*
Construction	\$15,214,000
Engineering/Permitting	\$6,846,000
Land Acquisition	\$1,901,000
Total	\$23,961,000

^{*} Costs have been rounded.

The PVNC Stormwater Infrastructure Plan is included in this SSMP as found in Appendix K.

Ten-Year Budget/Construction Plan

This plan identifies ten new CIP projects and \$21.9 million in capital improvements to WES's storm and surface water systems, including two existing projects that are in progress.

Table 19 presents one possible ten-year Stormwater CIP implementation plan. The cost of each project is spread over several years, ranging from two to five years. The first year is design, followed typically by one or two years of construction and then one or two years of post-construction monitoring and plant establishment.

The highest priority projects are 3-Creeks Floodplain Enhancement Project, which is in progress, Valley View Terrace Conveyance, which has a concept design and cost estimate that includes both roadway and drainage improvements, and SE Wildlife Estates Drive Ditch Inlet and Upstream Detention, which experienced significant flooding in 2022.

All identified individual CIP projects are within WES Service Area #2.

Table 19 Planning Level Ten-Year Design & Construction Cost Estimate¹

ID Status I	Name	Rank	Total Costs	FY1	FY2	FY3	FY4	FY5	FY6	FY7	FY8	ŋ	FY9
g, Ongoing	3-Creeks Floodplain Enhancement Project (Remaining Costs Only)	1	\$ 3,600,000	\$ 250,000	\$ 250,000	\$ 1,500,000	\$ 1,500,000	\$ 100,000					
1413 Existing, Planned	SE Valley View Terrace Conveyance (Storm Costs Only)2	ω	\$ 3,277,958						\$ 250,000	\$ 750,000	\$ 750,000	\$ 1,000,000	8
1005 New	SE Wildlife Estates Dr Ditch Inlet & Upstream Detention	2	\$ 1,679,470	\$ 500,000	\$ 1,000,000	\$ 179,470							
1079 New /	Aldercrest Culvert Replacement & Kellogg Creek Restoration	4	\$ 1,865,013					\$ 450,000	\$ 850,000	\$ 400,000	\$ 165,013		
1606 New	NCRA Stormwater Plan	σı	\$ 5,144,850	\$ 150,000				\$ 450,000	\$ 450,000		\$ 250,000	\$ 750,000	0
1055 New -	Thiessen Culvert Replacement & Kellogg Creek Restoration	6	\$ 801,635				\$ 200,000	\$ 601,635					
1406 New	Sunnyside Place Culvert Replacement & Stream Restoration	7	\$ 573,623	\$ 250,000	\$ 250,000	\$ 73,623							
1416 New I	Idleman Conveyance	9	\$ 1,394,900		\$ 300,000	\$ 400,000	\$ 400,000	\$ 294,900					
1322 New 9	SE 172 nd Ditch Conveyance Improvement	=	\$ 88,800	\$ 88,800									
1091 New	SE Clackamas Road Drainage Infrastructure	13	\$ 508,400					\$ 254,200	\$ 254,200				
1098 New I	Rose Creek New Detention Pond and Instream Restoration	14	\$ 2,589,010						\$ 250,000	\$ 950,000	\$ 1,000,000	\$ 389,010	
1125 New /	Aldercrest & Rusk Conveyance	15	\$ 440,100	\$ 100,000	\$ 340,100								
Total Program Costs			\$ 21,963,759	\$ 1,338,800	\$ 2,140,100	\$ 2,153,093	\$ 2.100.000	\$ 2,150,735	\$ 2,054,200	\$ 2,100,000	\$ 2,165,013	\$ 2,139,010	
1. The cost basis year is 2020.							* 11000000						

Total Program Costs and Staffing

Together with the CIP, the programs are estimated to require \$38.5 million to complete the identified scopes of work.

Table 20 Summary of Program and CIP Costs

	Total	Prograi	n Scope
Program	Program Cost	Quantity	Unit
1. Small Drainage Project Program			
New Large Birdcage Inlet or Manhole	\$ 276,480	34	Structures
Small Conveyance	\$ 567,000	3,000	Linear Feet
Root Removal/Pipe Lining	\$ 128,426	3	Known Issues
Program Cost	\$ 971,906		
2. Stormwater Pond Repair/Rehabilitation Program	\$ 4,114,951	63	Facilities
3. Water Quality Retrofit Program			
Large Stormwater Pond	\$ 1,080,288	1	Pond
Stormwater Planter in the ROW	\$ 236,250	5	Planters
Vegetated Swale	\$ 407,722	3	Swales
Program Cost	\$ 1,724,260		
4. Capital Projects (current estimate)	\$ 21,963,759	12	Projects
5. Restoration and Property Acquisition Program			
Box Culvert	\$ 1,565,088	5	Culverts
Riparian Revegetation	\$ 162,000	2	Known Issues
Instream Restoration (Baseline Funding)	\$ 5,000,000	\$500,000	Annual Funding
Property Acquisition for Habitat (Baseline Funding)	\$ 1,500,000	\$150,000	Annual Funding
Program Cost	\$ 8,227,088		
6. UIC Decommissioning/Retrofit Program			
Tier 1 - < 0' groundwater separation	\$ 528,412	10	Tier 1 UIC Retrofits
Program Cost	\$ 528,412		
7. Emergency Repairs	\$ 1,000,000	As needed	
TOTAL PROGRAM COSTS	\$ 38,530,376		

Program and CIP costs assume an administration rate of 15% to cover staff needed to manage programs and projects. Using an assumed fully burdened salary rate of \$73.12, the full time equivalent (FTE) has been calculated. If implemented over ten years, the programs and CIP are expected to require an average of 3.4 FTE to manage.

Likely Funding Sources

The stormwater CIP and programs may be funded through several revenue sources. WES maintains three budgeted surface water funds, including Operating, Construction, and System Development Charge Funds. Budgeted surface water fund sources and uses are summarized in Table 21. Generally, surface water service charges (monthly user fees) support routine maintenance, including repair and upgrade of existing stormwater assets. One-time capital projects typically have an ongoing impact on annual operating budgets through ongoing maintenance expenses and commitments. Some portion of service charges may be available to pay for ongoing priority programs.

Table 21 Surface Water Budgeted Funds

Budgeted Fund	Source of Funds	Uses of Funds
Operating Fund	Service Charges (user fees) Interest Other miscellaneous income	Materials and Services Transfers to the Surface Water Construction Fund Transfers to the Debt Service Fund
Construction Fund	Project participation New debt Transfers from the Surface Water Operating Fund Interest	Capital Project Expenditures
System Development Charge Fund	System Development Charges Interest	Capacity-enhancing Capital Project Expenditures Transfers to the Debt Service Fund for SDC-eligible debt

System Development Charges (SDCs) are allowed under Oregon Revised Statute 223.297 through 223.314. These funds may only be used for projects that serve growth or future development. Stormwater capital projects that increase capacity may be eligible to use system development charge funds. SDC potential capital project funding would be limited to the portion of the project that creates new capacity.

Capital projects may use a combination of cash reserves, service charges, SDCs, or debt (typically bonds). The appropriate mix of financing will depend on the capital investment lifecycle for each project. Revenue from other sources may be available when a project benefits or is done in partnership with other agencies or funds, such as transportation or sanitary sewer funds.

Competitive grants, state loans and funding, and federal grants and funding may be available through a variety of agencies and for a variety of targeted priorities. Potential revenue from the State of Oregon Clean Water State Revolving Loan Fund, such as supported the 3-Creeks Floodplain Enhancement Project, is project specific and is managed administratively as debt. Federal recovery dollars (e.g., American Rescue Plan Act (ARPA)) and infrastructure spending (e.g., Infrastructure and Investment Jobs Act) may be available to support construction projects that meet federal guidelines and priorities. For example, the Carli Creek Water Quality Project was supported by stream restoration funding provided by Portland General Electric in addition to surface water service charges. Prior to completion of this plan, WES submitted the following three CIPs for ARPA funding:

- Aldercrest Culvert Replacement & Kellogg Creek Restoration (CIP ID 1079)
- SE Clackamas Road Drainage Infrastructure (CIP ID 1091)
- Thiessen Culvert Replacement & Kellogg Creek Restoration (CIP ID 1055)

Summary

The program implementation plan is designed as a flexible framework rather than a rigid schedule of work. As circumstances change, the order of programs and projects should change to reflect urgent needs and emergent opportunities. WES should continuously evaluate the community's needs and the progress of implementation to ensure resources are being allocated to urgent needs, preventative maintenance, and anticipatory improvements in the correct proportion.

The prioritization methodology and stormwater toolkit are included with the SSMP. When WES identifies new issues and opportunities, staff will be able to rapidly rank projects against existing priorities and develop conceptual plans and estimate costs to implement solutions. These tools will allow WES to adapt the implementation plan to changing circumstances.

Section 8. References

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Clackamas Water Environment Services (WES) Storm System Master Plan (SSMP) 2022 Appendices



Appendix A

Technical Memorandum:
Preliminary Soil Infiltration Characterization Clackamas County WES Storm System Master Plan

