

# City of Bend Utilities

## Public Advisory Group

### Summer Subcommittee



CITY OF BEND

**Location:** [Microsoft Teams Meeting Link](#)

**Date:** August 7, 2024

**Time:** 11am-12:30pm

**Speakers:**

- Lori Faha, City of Bend Environmental Resources Manager
- Elisabeth O'Keefe, City of Bend Stormwater Program Manager
- Austin Somhegyi, City of Bend Stormwater Master Plan Project Manager
- Trista Kobluskie, Stormwater Master Plan Project Manager
- Aubrie Koenig, Facilitator

#### Meeting Agenda

**Purpose:** Collect input from the subcommittee on various stormwater management topics.

**1. Introduction**

**2. UIC Specifications and Groundwater Protectiveness**

- a. Share information about upcoming changes on UIC specifications and groundwater protectiveness.
- b. Discussion questions:
  - i. *How can regulatory differences between privately owned and City-owned UICs be best communicated to developers?*
  - ii. *What is your experience with obtaining individual UIC permits for development projects?*
  - iii. *What recommendations do you have to make the specifications easier to understand?*
  - iv. *What challenges may the proposed edits lead to for developers?*

**3. Drywell Siting Criteria**

- a. Review and discuss suggested drywell siting criteria (see attached memo).
- b. Discussion questions:
  - i. *Do the modified drywell siting criteria provide enough flexibility to add modified drywells to the stormwater toolbox in a variety of development scenarios?*



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**4. Drillhole Decommissioning Priorities**

- a. Review and discuss process for ranking drillholes for decommissioning or replacement (see attached memo).

**b. Discussion questions:**

- i. How quickly do you think the City should attempt to work through the 17 priority locations (5, 10, 15, 20 years)?*

**5. Stormwater Master Plan Prioritization Criteria**

- a. Review and discuss draft Stormwater Master Plan capital improvement program prioritization criteria (see attached matrix).

**b. Discussion questions:**

- i. Do you support the general approach to scoring? What about the relative total score available in each category? And the relative maximum score of each criterion within a category?*

**6. Summary and Closing**



## FINAL TECHNICAL MEMORANDUM

# Modified Drywell Siting Criteria and Drillhole Decommissioning Framework, City of Bend, Oregon

**To:** Trista Kobluskie, PE / Otak, Inc.

**From:** Matt Kohlbecker, RG / GSI Water Solutions, Inc.  
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**CC:** Elisabeth O'Keefe / City of Bend  
Lori Faha, PE / City of Bend

**Date:** July 12, 2024

## 1. Introduction

This technical memorandum (TM), prepared by GSI Water Solutions, Inc. (GSI) for Otak, Inc. (Otak), presents an evaluation of modified drywell suitability and a drillhole replacement prioritization to inform the City of Bend's (City) updated Stormwater Master Plan. The following sections provide an overview of Underground Injection Control (UIC) configurations, the purpose and objectives of this TM (Section 1.2), and the organization of this TM (Section 1.3).

### 1.1 Underground Injection Control Types and Configuration

The City uses about 6,500 UICs to manage stormwater runoff from public rights-of-way (GSI, 2023). According to the Oregon Administrative Rules, a UIC is a well, improved sinkhole, or other subsurface fluid distribution system that is used for the subsurface emplacement or discharge of fluids<sup>1</sup>. About 5,500 of the City's UICs are drywells, and about 1,000 of the City's UICs are drillholes. Drywells are typically 10 to 20 feet deep cylindrical structures constructed of 4-foot diameter concrete rings with weep holes. Drillholes are typically 6-inch diameter open boreholes completed with a steel surface casing (generally 10 to 20 feet) (GSI, 2023) that may be up to 100 feet deep (the maximum UIC depth allowable by state law for rule authorized UICs<sup>2</sup>). Recently, new construction techniques have been introduced in Oregon that allow for installation of drywells to up to 100 feet deep (modified drywells).

Drillholes are more common west of the Deschutes River where low-permeability volcanic ash layers are prevalent, and in older parts of the City. New drillholes have not been permitted in the City standards for several years due to maintenance issues, the lack of pretreatment, and due to the difficulty and expense of retrofitting.

<sup>1</sup> OAR 340-044-0005(24)

<sup>2</sup> OAR 340-044-0018(3)(a)(G)

## 1.2 Purpose and Objectives

The purpose of this TM is to provide the City with information about new-to-Oregon stormwater infiltration devices (i.e., modified drywells) and a prioritization framework for decommissioning of old stormwater infiltration devices (i.e., drillholes) to inform the City's 2024 Stormwater Master Plan update. The objectives of the TM are:

- Provide an overview of modified drywells, including advantages and disadvantages.
- Develop criteria for minimizing the risk of environmental contamination from modified drywells.
- Develop a prioritization framework for decommissioning drillholes.

## 1.3 Technical Memorandum Organization

The remainder of this TM is organized as follows:

- Section 2: Provides criteria for siting modified drywells
- Section 3: Outlines drillhole replacement and upgrade prioritization

## 2. Modified Drywell Siting Criteria

Conventional drywells, which comprise the City's approximately 5,500 drywells, are 4-foot diameter structures typically excavated with a hydraulic clam shell that have a maximum depth of approximately 40 feet in Oregon. Modified drywells have a similar diameter as conventional drywells but are excavated with large-diameter augers. Modified drywells are deeper than conventional drywells, generally up to 100 feet deep depending on local geology. Two examples of as-built modified drywells are shown in Figure 1.

Modified drywells have been used in the desert southwest since the 1970s; they have been installed at significant depths to bypass shallow, low-permeability caliche layers and rock. Recently, the City of Gresham, Oregon, constructed a modified drywell to bypass a shallow perched aquifer, and King County has managed stormwater runoff in dense residential neighborhoods by drilling 50 to 100 feet deep drywells to bypass shallow, low permeability glacial till and infiltrate stormwater into the underlying sands (Radford, 2016). The City of Bend has been receiving increased requests from developers to construct modified drywells.

This section summarizes the advantages of modified drywells (Section 2.1), the disadvantages of modified drywells (Section 2.2), criteria for siting modified drywells to minimize the risk of environmental contamination (Section 2.3), and conclusions (Section 2.4).

### 2.1 Advantages of Modified Drywells

Advantages of modified drywells (when compared to drillholes or traditional drywells) include the following:

- **Footprint.** Modified drywells have a small footprint because the pretreatment device is installed within the same borehole as the drywell, making modified drywells a good option in urban areas where space is limited.
- **Bypass shallow, low-permeability soil layers.** Modified drywells can bypass shallow soils characterized by low infiltration rates (e.g., silt, clay, or volcanic ash), targeting deeper soils and sediments have higher infiltration rates.
- **Larger storage volume and improved treatment compared to a drillholes.** Because of their large-diameter, modified drywells can store a larger volume of water than a drillhole, thereby allowing the water to slowly exfiltrate from the drywell in low-permeability soil environments. In addition, unlike drillholes, proprietary modified drywells are equipped with pretreatment devices like a sedimentation

manhole to allow for settling of stormwater solids, hydrocarbon-absorbent pillows, and intake screens/debris shields.

- **More head during infiltration.** Higher infiltration rates can be achieved at modified drywells because the drywell can accommodate additional mounding (i.e., head) during infiltration.

## 2.2 Disadvantages of Modified Drywells

Disadvantages of modified drywells (when compared to drillholes or traditional drywells) include the following:

- **Higher risk of causing groundwater contamination.** The highest risk to groundwater is from contaminants in stormwater that are toxic, common, mobile, and persistent (GSI, 2013). Pollutant fate and transport modeling by GSI (2011) showed that most common stormwater pollutants do not reach groundwater as long as there are five feet of vertical separation between the bottom of the drywell and groundwater. However, recent modeling by GSI (2024) showed that significantly larger vertical separation distances are needed to protect groundwater from emerging pollutants [i.e., per- and polyfluoroalkyl substances (PFAS) and simazine will reach groundwater unless there are about 53 feet and 37 feet of vertical separation, respectively]. Because modified drywells are deeper than conventional UICs, they minimize vertical separation distance and, therefore, increase the risk of groundwater pollution.
- **Difficult and expensive to clean in the case of a spill of hazardous material.** Traditionally, drywells are cleaned via pressure washing, scraping of the interior walls, and/or vacuuming with a vactor truck if a spill occurs. However, because vactor trucks are not effective on drywells that are more than 40 feet deep, removal of a spill of hazardous materials from a modified drywell cannot be performed using traditional techniques. Options are drill or pump rigs and bailers to remove spilled material from deep drywells, which would significantly increase the cost of cleanup. In addition, remediation of spilled material that has infiltrated into soils surrounding the drywell would be significantly more expensive due to the increased depth.
- **Novelty and lack of performance data.** There is limited research on modified drywell performance in Oregon over time due to the relative newness in the Pacific Northwest. Geosyntec (2020) noted data gaps including Infiltration testing guidance prior to UIC citing and drywell lifecycle research, both of which would be beneficial when planning a new UIC. However, it should be noted the City of Gresham's modified drywell has experienced no performance declines since it was constructed in the Spring of 2022.
- **Often more expensive than traditional UICs.**

## 2.3 Criteria to Minimize Risk of Environmental Contamination from Modified Drywells

This section provides criteria to minimize the risk of environmental contamination from modified drywells, including siting criteria (Section 2.2.1), construction practices (Section 2.2.2), spill mitigation (Section 2.2.3), pretreatment (Section 2.2.4), and operations and maintenance (Section 2.2.5).

### 2.3.1 Siting Criteria

Proper drywell siting minimizes the risk that a drywell will contaminate groundwater, and is especially important for modified drywells because groundwater contamination is significantly more expensive to clean up. As long as a 53-foot vertical separation distance between the base of the UIC and the seasonal high of groundwater are adhered to (based on the findings of GSI's 2024 Groundwater Protectiveness Demonstration Update), groundwater contamination from common stormwater pollutants should not be of

concern. Contamination caused by spills of hazardous material poses the highest risk of groundwater contamination.

Drywell siting criteria are covered in Bend's standards (2023). Drywell siting should consider the local factors such as land use (which will affect the quality of the water discharging to the drywell), traffic volume, water well locations, groundwater depth, and geology. See Section 3 prioritization criteria for further information on these topics. There is a low risk that drywells meeting all of the following criteria will be impacted by a spill. Therefore, modified drywells may be sited in drainage basins that meet these criteria (see green-light areas in Figure 2):

- Residential land use
- Streets that experience less than 1,000 vehicle trips per day,
- Outside of two-year time-of-travel zones from municipal supply wells and >500 feet from water wells, and
- Outside of areas with perched groundwater (i.e., the Old Mill District Perched Area and North Bend Perched Area).

Developers may request that modified drywells be used in areas that do not meet all these criteria. The City may consider approving modified drywell use in yellow-light areas identified in Figure 2, such areas as long as additional protective measures are incorporated into the drywell design (e.g., spill control manholes, as shown in Figure 1). In no case should modified drywells be constructed within 500 feet of a water well or within the two-year time-of-travel zone of a municipal supply well.

The City of Gresham does not have formal siting criteria; however, the one modified drywell that has been installed so far was installed to meet the following protectiveness:

- Residential streets (< 1,000 trips per day),
- Outside of two-year time-of-travel zones from municipal supply wells, and
- Must have a shut off valve.

### **2.3.2 Construction**

The following construction methods mitigate groundwater contamination, and should be common practice at a site where a modified drywell is being constructed:

- Drywell inlets should be sealed with two layers of UV protected geotextile material until nearby construction is complete, to prevent sediment ingress (ADEQ, 2018).
- Drywells should be covered by a solid manhole so that flow into the drywell is solely through the interceptor inlet, and the manhole should be bolted and labelled 'stormwater only' to prevent tampering (ADEQ, 2018).
- Manholes installed at modified drywells should be modeled on the "spill control manhole" examples provided in Figure 1 to provide some level of additional spill protection.

### **2.3.3 Spill Mitigation**

To mitigate the effect of spills, GSI recommends that Bend (similarly to what GSI previously recommended to the City of Gresham) have a spill response plan in place and automatic shut-off-valves that close when spills are detected. In addition, if the modified drywell is constructed of an infiltration pipe that runs inside the annular space between the sedimentation manhole and borehole wall, and then curves underneath the

bottom of the sedimentation manhole, GSI recommends a cleanout be installed so that the infiltration pipe below the sedimentation manhole can be accessed by a bailer to clean material out of the drywell, or a brush to clean the drywell.

### 2.3.4 Pretreatment

Pretreatment options for stormwater discharges are described in DEQ's Industrial Stormwater Best Management Practices Manual (Jurries and Ratliff, 2013).

Pretreatment recommendations for drywell type are described in Table , and should be considered for modified drywells. The best pretreatment option for a site will be determined by site characteristics and known potential pollutants at a site.

**Table 1. Pretreatment Recommendations for Drywell Type.**

Drywell Type	Pretreatment Goals	Types of BMPs Recommended	Additional Spill Control and Outreach Recommendations
Conventional	Manage rate of clogging <sup>1</sup> , oil control, metals treatment	From Central Oregon Stormwater Manual (2010): <ul style="list-style-type: none"> <li>▪ Low impact development</li> <li>▪ Infiltration swale</li> <li>▪ Vegetated filter strips</li> <li>▪ Oil/water separator</li> <li>▪ Wetponds</li> <li>▪ Extended detention dry ponds</li> <li>▪ Evaporation ponds</li> <li>▪ Grassy swales</li> <li>▪ Sedimentation manholes</li> <li>▪ Emerging technologies</li> <li>▪ Treatment trains</li> </ul>	N/A
Modified	“Conventional” goals, plus: <ul style="list-style-type: none"> <li>▪ Isolate and contain spills, and</li> <li>▪ Capture trash</li> <li>▪ Provide treatment of particulate-bound pollutants</li> </ul>	From Geosyntec (2020): <ul style="list-style-type: none"> <li>▪ Oil absorbent pillows</li> <li>▪ Debris screen</li> <li>▪ Hydrodynamic separator</li> <li>▪ TAPE Pretreatment GULD<sup>2</sup></li> <li>▪ Bioretention</li> <li>▪ Media filter</li> <li>▪ TAPE Basic GULD<sup>3</sup> (with sump element)</li> <li>▪ Alternative pretreatment BMP selected based on clogging and water quality considerations (Subject to LEA approval)</li> </ul>	From Geosyntec (2020): <ul style="list-style-type: none"> <li>▪ Conduct source control investigation and outreach for potential sources of human waste</li> <li>▪ Closed bottom sump with elevated outlet, documentation of a spill response plan and adequately trained spill response team, or demonstration of low risk of spills in the drainage area</li> <li>▪ Include an automatic shutoff valve</li> </ul>

#### Notes

<sup>1</sup>Clogging is not a groundwater quality risk, however it affects the necessary maintenance intervals and lifecycle cost of a drywell and needs to be considered in selection of pretreatment BMPs.

<sup>2</sup>TAPE Pretreatment General Use Level Designation (GULD) BMPs are BMPs that meet 50% removal of TSS, when influent is between 100 and 200 mg/L.

<sup>3</sup>TAPE Basic GULD BMPs are BMPs that meet 80% removal of TSS when influent is between 100 and 200 mg/L.

### 2.3.5 Operations and Maintenance

Inspection and maintenance recommendations for modified drywells are outlined below. Records should be kept of all inspections, problems, and actions taken.

## Inspections

Inspections should be conducted according to a schedule, ideally at least annually. The inspection should include but not be limited to the following (ADEQ, 2018):

- Ensure that no hazardous materials are being used or stored in the area.
- Check for staining, discoloration, or residue on the surrounding the area (i.e. oil stains on pavement), or odors, all of which could indicate potentially contaminating materials.
- Check settling chambers and interceptor compartments for debris and sediment (which should be removed under maintenance).
- Check chemical absorbents (where present) and replace if discolored and/or below the water surface.
- Track performance, ranging from documenting failure (e.g., performance) to testing modified drywells and comparing performance over time.

## Maintenance

Maintenance of drywells should include cleaning filters and screens, replacement of chemical absorbents, and removal of sediment, debris, and trash:

- ADEQ (2018) recommends that debris and silt be removed at regularly scheduled times, i.e. at least annually, or at a minimum at the following times:
  - “In paved areas when the sediment level fills 10 percent of the effective settling capacity.
  - In landscaped areas when the sediment level fills 25 percent of the effective settling capacity.
  - When ownership of the property changes.
  - When material not resulting from storm water or urban surface runoff enters the drainage system interceptor or drywell settling chamber.”

Regular street cleaning should also be conducted to reduce debris sources that could be mobilized by runoff to enter the UICs.

## 2.4 Advantages, Disadvantages, and Risk Minimization Conclusions

Table below summarizes the modified drywell disadvantages (i.e., higher risk of causing groundwater contamination, difficult to clean, and lack of performance data) and options for minimizing the risk associated with each disadvantage.

**Table 2. Modified Drywell Disadvantages and Mitigation Options.**

Disadvantage	Risk Minimization Option	Option Details
Groundwater contamination	Siting	Establish siting criteria based on land use, perched groundwater areas, setbacks from water wells, and vehicle trips per day
	Construction	Seal drywell inlets, secure manhole cover, sump
	Spill mitigation	Spill response plan, shut off valve
	Pretreatment	Require enhanced pretreatment (e.g., spill control manholes)

Disadvantage	Risk Minimization Option	Option Details	
Difficult/expensive to clean	Operations and Maintenance	Inspections at least annually, regular cleaning of drywell and street	
	Siting	Setbacks from potential sources of large sediment load associated with construction sites, or implement other best management practices	
	Preventative measures (so cleaning not required)	Construction	Seal drywell inlets, secure manhole cover, sump
	Spill mitigation	Spill response plan, automatic shut off valve, install cleanout to access infiltration pipe	
	Pretreatment	Require enhanced pretreatment (e.g., engineered media filters, vegetated strips, manufactured devices, and detention basins)	
	Operations and Maintenance	Inspections at least annually, regular cleaning of drywell and street	
Novelty and lack of performance data	Operations and Maintenance	Track and compile records of drywell failure and performance testing	

### 3. Prioritization Framework for Drillhole Decommissioning

A drillhole is a 6" diameter open hole, typically completed with 20 feet of surface casing, that varies in depth from 10 feet to over 100 feet deep (City of Bend, 2012). Drillholes have not been allowed in the City's Standards and Specifications for several years, in part because they require frequent maintenance, are characterized by a lack of pretreatment, and they can be difficult and expensive to retrofit. This section provides a framework for prioritizing drillhole retrofits and/or replacements to meet the City's goal of efficiently managing stormwater by infiltration in a manner that is protective of groundwater quality.

#### 3.1 Methods for Developing Framework to Prioritize Drillhole Decommissioning

GSI developed a framework for prioritizing drillhole decommissioning, in collaboration with the City of Bend, by calculating a risk score for each drillhole. The risk score was calculated for each drillhole location based on the following criteria: land use (Section 3.1.1), traffic volume (Section 3.1.2), risk to drinking water quality (Section 3.1.3), and current drillhole condition (Section 3.1.4). Each criterion was divided into different risk categories (e.g., high, medium or low), a score was assigned to each category, and a weighting was assigned to each score. Weighting was either applied as an "additive" (meaning the total risk score for a given drillhole is determined by summing the score for the criterion) or a "multiplier" (meaning the total risk score for a given drillhole is determined by multiplying the score for the criterion).

##### 3.1.1 Land Use

Land use is correlated with pollutant load and likelihood of a hazardous material spill. Drillholes located in land use categories associated with higher pollutant loads and spill potential were prioritized for retrofit or replacement. Land use categories are shown in Table 3, and are classified into "high risk," "moderate risk," and "low risk" categories such that the highest risk is associated with the highest pollutant load and spill likelihood. The land use dataset is from the City of Bend Zoning Designations. Risk assigned to Land Use categories are shown on Figure 3.

**Table 3. Risk Assigned to Land Use (City of North Bend, 2015; City of Bend, 2024).**

Risk Category	City of Bend Zoning Designation	Definition	Score Assigned	Multiplier or Additive
High Risk	Industrial	Manufacturing and Production, industrial service, warehouse, transportation, freight, and distribution	3	Additive
Moderate Risk	Commercial	Retail, services, and offices		
	Mixed-Use	Residential land use with retail/commercial/office and/or service uses in the same building or on the same site.		
	Public Facility (AND >50% impervious <sup>1</sup> )	Public facilities, including Town Hall, recycling center, Community parks, sports complexes (and other outdoor recreation)	2	Additive
Low Risk	Urban Area	Urban Growth Area, i.e. area that may be developed in the future but not yet determined what land use it will be developed to.		
	Public Facility (AND <50% impervious <sup>1</sup> )	<80% developed to just capture community parks, sports complexes (and other outdoor recreation)		
	Professional Office	"The Professional Office zone is intended to provide for professional offices in locations near arterial or collector streets and to provide a transition of uses between residential areas and other more intensive zones. Through design standards, the Professional Office zone is intended to create a mix of high density residential housing, office and service commercial developments that are pedestrian oriented and provide a positive contribution to the streetscape."	1	Additive
	Residential	Low to high-density housing		

**Note:**

<sup>1</sup>The 50% impervious threshold was used to ensure the Deschutes Recycling center was captured. This site is within the 'public facilities' layer but is a higher risk than other facilities including parks that predominantly made up this layer so this impervious threshold was added to weed out this and other potentially contaminating sites.

### 3.1.2 Traffic Volume

Traffic volumes are correlated with pollutant load to a UIC, such that higher traffic volumes result in a higher pollutant load due to higher brake pad wear, deposition of hydrocarbon combustion byproducts, etc. Drillholes located in higher traffic volume streets were prioritized for retrofit or replacement. Traffic volumes were prioritized under the assumption that certain road types are characterized by higher traffic volumes, and thus have a greater pollutant load entering UICs (City of Bend Transportation and Mobility, 2024). Data for this category came directly from the City, in a shapefile titled 'Road\_Centerlines.' Risk categories that were assigned to Traffic Volume are outlined in Table 4 and displayed on Figure 4.

**Table 4. Risk Assigned to Traffic Volume.**

Risk Category	Vehicle Trips Per Day	Road classes within this category	Score Assigned	Multiplier or Additive
High Risk	> 1,000 vehicle trips per day (TPD)	Highways; Major Arterials; Ramps	3	Additive
Low – Moderate Risk	<1,000 vehicle TPD	Collector; Local; Minor Arterial; Resource; Service	1	Additive

### 3.1.3 Risk to Drinking Water Quality

This risk posed by drillholes to drinking water quality was assessed by considering the distance between the drillhole and the nearest water well (i.e., whether a drillhole is located within the two-year time-of-travel zone or 500 feet of a water well) and the depth to groundwater. A time-of-travel zone is the volumetric extent of groundwater that is pumped by a drinking water well over a given time period. For example, the two-year time-of-travel zone represents the groundwater that is pumped by a drinking water well over two years. DEQ rules discourage construction of UICs within the two-year time-of-travel zone to minimize risk to groundwater quality. If a two-year time-of-travel zone has not been delineated for a well, then DEQ rules discourage construction of UICs within 500 feet of a water well. In addition to location relative to a water well, UICs pose a higher risk to drinking water quality in areas of shallow groundwater because there is not as much unsaturated soil to filter and remove pollutants from stormwater. Two areas of shallow groundwater have been identified in the City.

#### Water Well Locations

Drillholes that are located within a two-year time-of-travel zone or 500 feet of a water well were prioritized for retrofit or replacement. Water wells included in this category were municipal supply wells, irrigation wells, and domestic supply wells (GSI, 2022). Risk categories that were assigned are outlined in Table 5a and shown on Figure 5a. An extra high risk category was added with a large multiplier to ensure that any drillholes within 100 feet of a water well rose to the top of the prioritization list.

**Table 5a. Risk Assigned to Water Well Locations.**

Risk Category	Well Location	Score Assigned	Multiplier or Additive
Extra High Risk	<100 ft from water well	10	Multiplier
High Risk	<500 ft from water well	3	Additive
Low Risk	>500 ft from water well	1	Additive

An additional extra high risk category was added (Table 5b) with a large multiplier to ensure that any drillholes within Two-year time-of-travel of a public water well zones rose to the top of the prioritization list. This extra high risk category is shown in Figure 5b. There would be a very high impact if a public water well were to become contaminated due to the large population served.

**Table 5b. Risk Assigned to Water Well Locations.**

Risk Category	Well Location	Score Assigned	Multiplier or Additive
Extra High Risk	Two-year time-of-travel of a public water well zones	20	Multiplier

#### Groundwater depth

The depth to the regional groundwater table in Bend ranges from 300-750 feet bgs; however, areas of perched groundwater with groundwater depths of a few feet to 200 feet bgs have been identified within the City (GSI, 2024). These perched groundwater areas are primarily within two regions: the Old Mill District Perched Area and the North Bend Perched Area (Figure 5c). Based on the findings of GSI's 2024 Groundwater Protectiveness Demonstration Update, 53 ft vertical separation between the base of the UIC and the seasonal high of groundwater is required to protect groundwater from PFAS in stormwater (GSI, 2024). Because drillholes can be constructed to 100 feet deep, PFAS in stormwater discharges from drillholes has the potential to reach groundwater in these perched areas.

Drillholes located in areas of perched groundwater were prioritized for retrofit and/or replacement. These locations are shown in Figure 5c. Perched groundwater within the "North Bend Perched Area" or the "Old Mill

"District Perched Area" has been applied as a multiplier due to the significant risk of introducing contamination to shallow groundwater posed by drillholes within these areas. Risk categories that were assigned to perched groundwater areas are shown in Table 6 and on Figure 5c.

**Table 6. Perched Groundwater within the "North Bend Perched Area" or the "Old Mill District Perched Area."**

Risk Category	Vertical Separation from Groundwater/Perched Groundwater	Score Assigned	Multiplier or Additive
Extra High Risk	Areas of perched groundwater <b>AND</b> <53 ft vertical separation from groundwater	2	
High Risk	Areas of perched groundwater	1.5	Multiplier
Low Risk	Outside of a perched groundwater area	1	

### 3.1.4 Current Drillhole Condition

For this section, GSI reviewed the 'Stormwater Master Plan Flooding Locations' spreadsheet as well as the 'Stormwater Flooding Report' for City-owned drillholes, provided by Travis Somers of the City of Bend Stormwater Utility Department via email in April 2024. The 'Stormwater Master Plan Flooding Locations' spreadsheet identified UICs (both drywells and drillholes) with known flooding issues that the City is aware of. These were organized by the City by order of priority to replace or repair, with Priority 1 being the highest priority to address. The Stormwater Flooding Reports detailed known information about each site, along with photos. These are included in Appendix A and locations are shown on Figure 6. Risk categories that were assigned to current drillhole conditions are shown in Table 7. A multiplier was applied to drillhole conditions to ensure drillholes that have been pre-prioritized for replacement would float to the top of this prioritization list.

**Table 7. Risk assigned to Current Drillhole Conditions.**

Risk Assigned	Category	Definition <sup>3</sup>	Score Assigned	Multiplier or Additive
High Risk	Level 1 Priority	Stormwater causes or is at risk of causing safety concerns. Stormwater causes property damage or has the risk of causing property damage. Frequent responses from the City are required.	3	
Moderate Risk	Level 2 Priority	Stormwater infrastructure may be undersized or failing. Less frequent responses from the City are required, often after a more sustained rain event	2	Multiplier
Low Risk	Level 3 Priority	Low priority locations. Some improvements completed at most of these sites to improve/control runoff. These locations should be evaluated overtime to decide if existing infrastructure is adequate, needs to be replaced, or additional controls are needed to increase capacity.	1	

## 3.2 Drillhole Decommissioning Prioritization Results

A score was assigned to each drillhole at the end of this scoring exercise. The results of the drillhole prioritization scoring assessment are shown on Figure 7. On this figure, drillhole rankings from 1 to 10 and >10 are displayed, with the drillhole ranked as number one being the drillhole that has the highest priority for replacement. The top five ranked drillhole prioritization results are shown in Table 8. The full drillhole scoring is shown in Appendix B.

<sup>3</sup> Provided by Travis Somers at the City of Bend via email on March 21, 2024

**Table 8. Drillhole Decommissioning Prioritization Results.**

Priority Rank	Drillhole ID(s)
1	DDH009510, DDH009485, DDH009498, DDH009625, DDH009624, DDH009514, DDH009513, DDH009550, DDH009520, DDH009841, DDH009727, DDH009728, DDH009767, DDH009766, DDH009764, DDH009765, DDH009763
2	DDH009875, DDH009932
3	DDH010013, DDH009573, DDH009572, DDH009571, DDH009396, DDH009397, DDH009394, DDH009444, DDH009431, DDH002022, DDH009122, DDH009129, DDH009130, DDH009586, DDH009585, DDH009583, DDH009446, DDH009447, DDH009438, DDH009419, DDH009420, DDH009403, DDH009425, DDH002020, DDH002049, DDH009407, DDH009406, DDH009405, DDH009404, DDH009416, DDH009426, DDH009423, DDH009424, DDH009440, DDH009441, DDH009436, DDH009437, DDH009417, DDH009418, DDH009392, DDH009386, DDH001022, DDH001023, DDH001013, DDH001012, DDH009398, DDH009439, DDH009395, DDH009421, DDH009422, DDH009482, DDH009443, DDH009381, DDH009384, DDH009380, DDH009385, DDH001015, DDH001014, DDH009399, DDH009415, DDH009412, DDH009413, DDH009628, DDH009629, DDH009632, DDH009604, DDH002018, DDH002019, DDH009445, DDH009387, DDH009388, DDH009389, DDH009390, DDH009391, DDH009393, DDH009402, DDH009401, DDH009400, DDH009429, DDH009430, DDH009435, DDH009434, DDH009433, DDH002023, DDH009428, DDH009631, DDH009630, DDH009605, DDH009603, DDH009609, DDH009606
4	DDH009902, DDH009863, DDH010018, DDH010019
5	DDH009454

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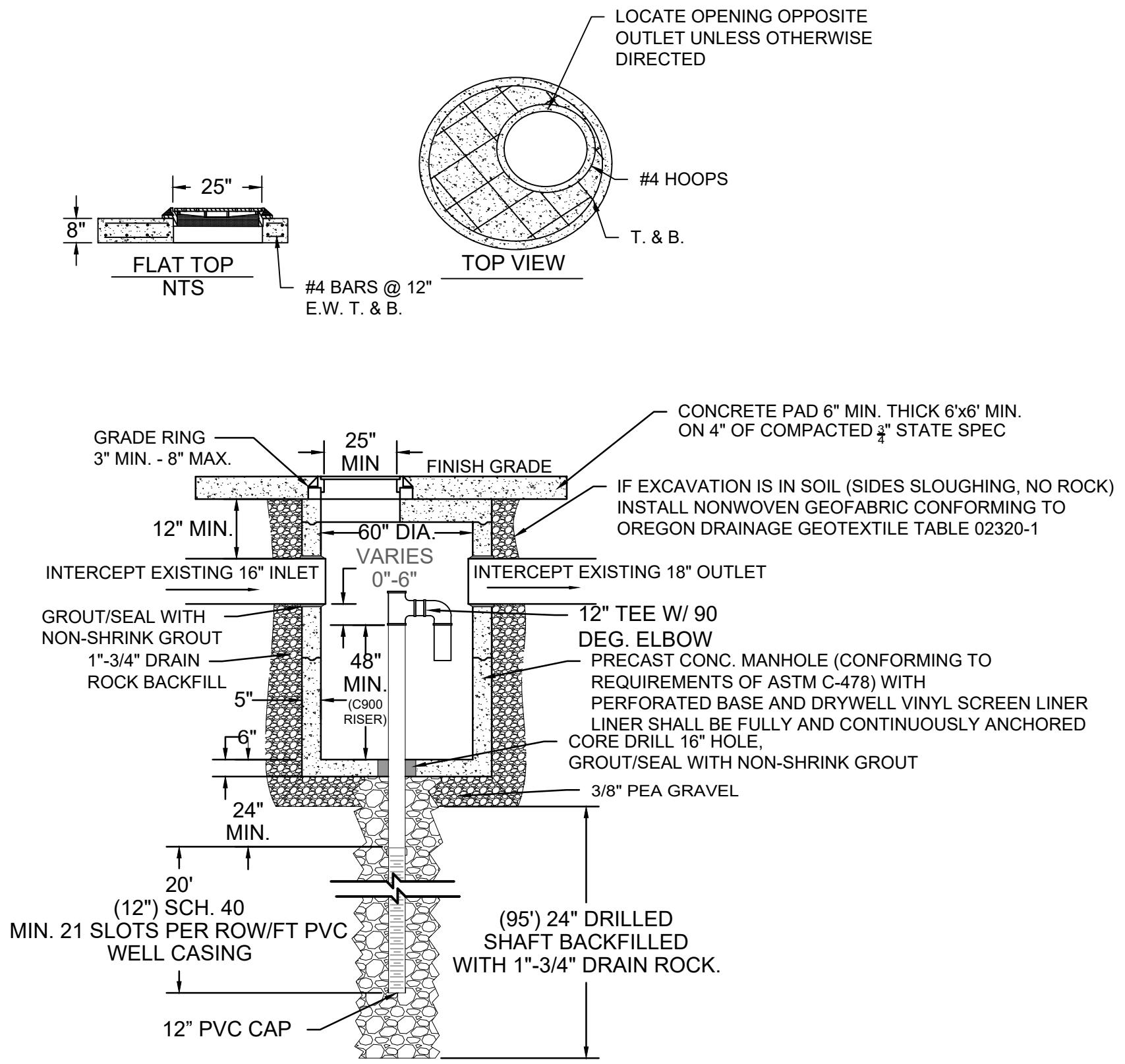
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[https://websites.pmc.ucsc.edu/~afisher/post/drywell/Torrent/TorrentDrywellPres\\_Watsonville150401.pdf](https://websites.pmc.ucsc.edu/~afisher/post/drywell/Torrent/TorrentDrywellPres_Watsonville150401.pdf)

**FIGURE 1****Deep Drywell Design for Overflow at Awbrey Reservoir**

City of Bend Modified Drywell  
Siting Criteria and Drillhole  
Decommissioning Framework

**NOTES**

This example was provided by the City of Bend

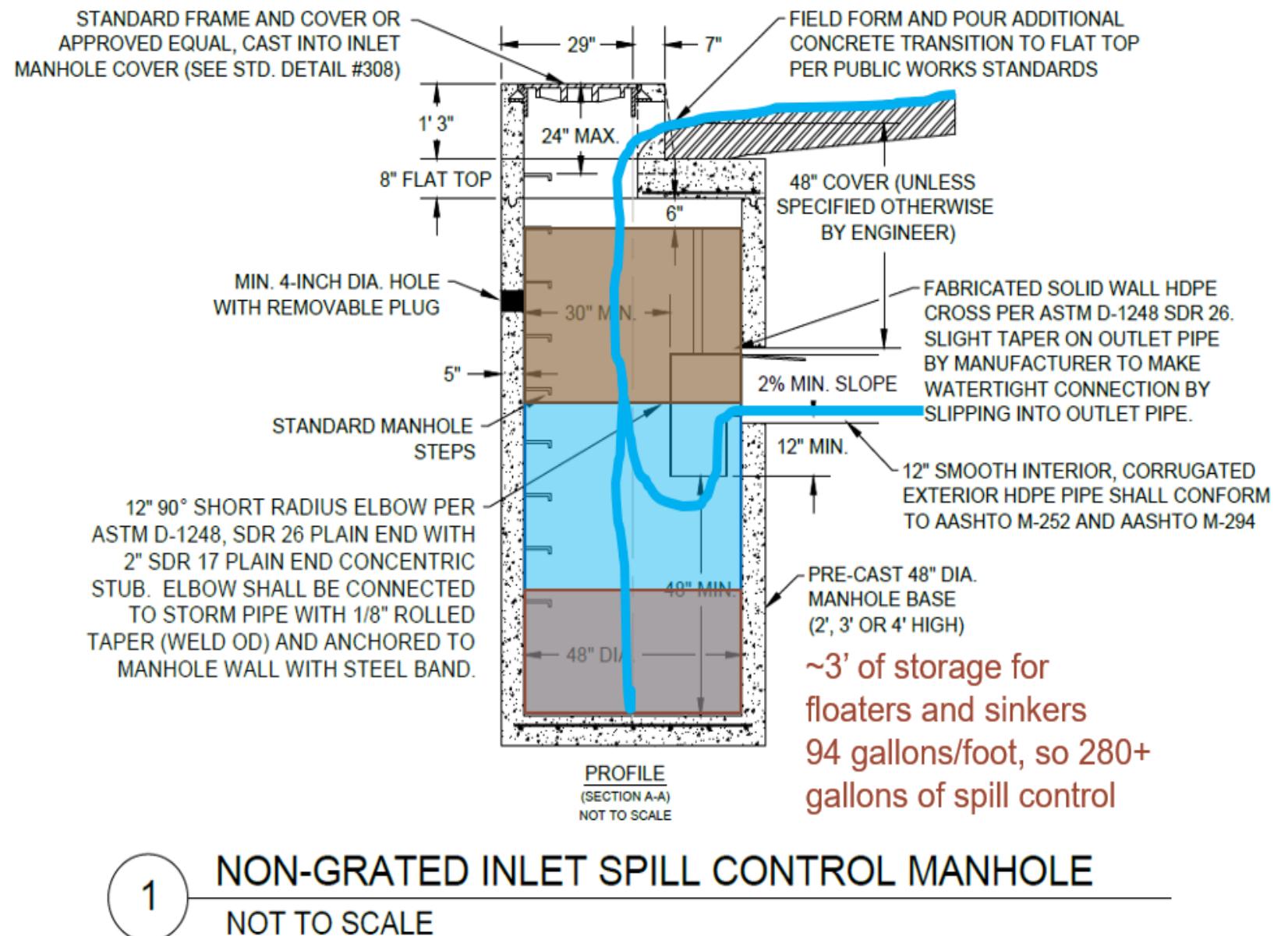
1  
G8.0  
NTS

**DEEP DRYWELL DETAILS**

**FIGURE 1**

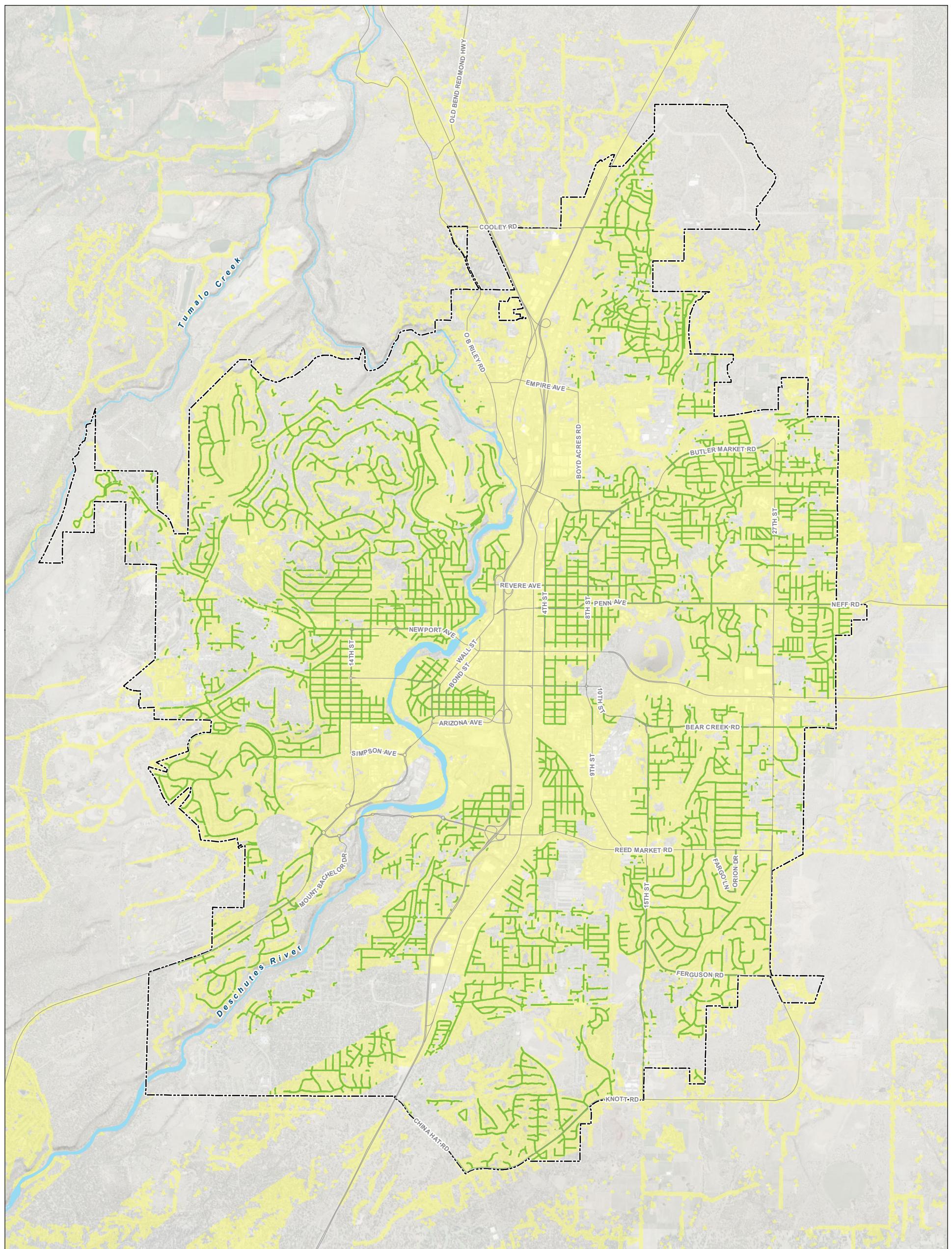
**Gresham Example**

City of Bend Modified Drywell  
Siting Criteria and Drillhole  
Decommissioning Framework



**NOTES**

This spill control manhole example was provided by the City of Gresham



#### LEGEND

- Green Light - Impervious surfaces, residential land use, streets that experience less than 1,000 vehicle trips per day, outside of two-year time-of-travel zones and <500 ft from water wells, and outside of areas with perched groundwater
- Yellow Light - Impervious areas that are outside of the two-year ToT and greater than 100 feet from all water wells

#### All Other Features

- City Boundary
- Major Road
- Watercourse
- Waterbody

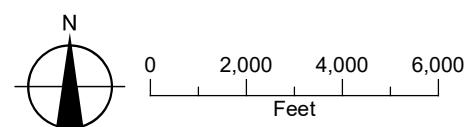
**FIGURE 2**

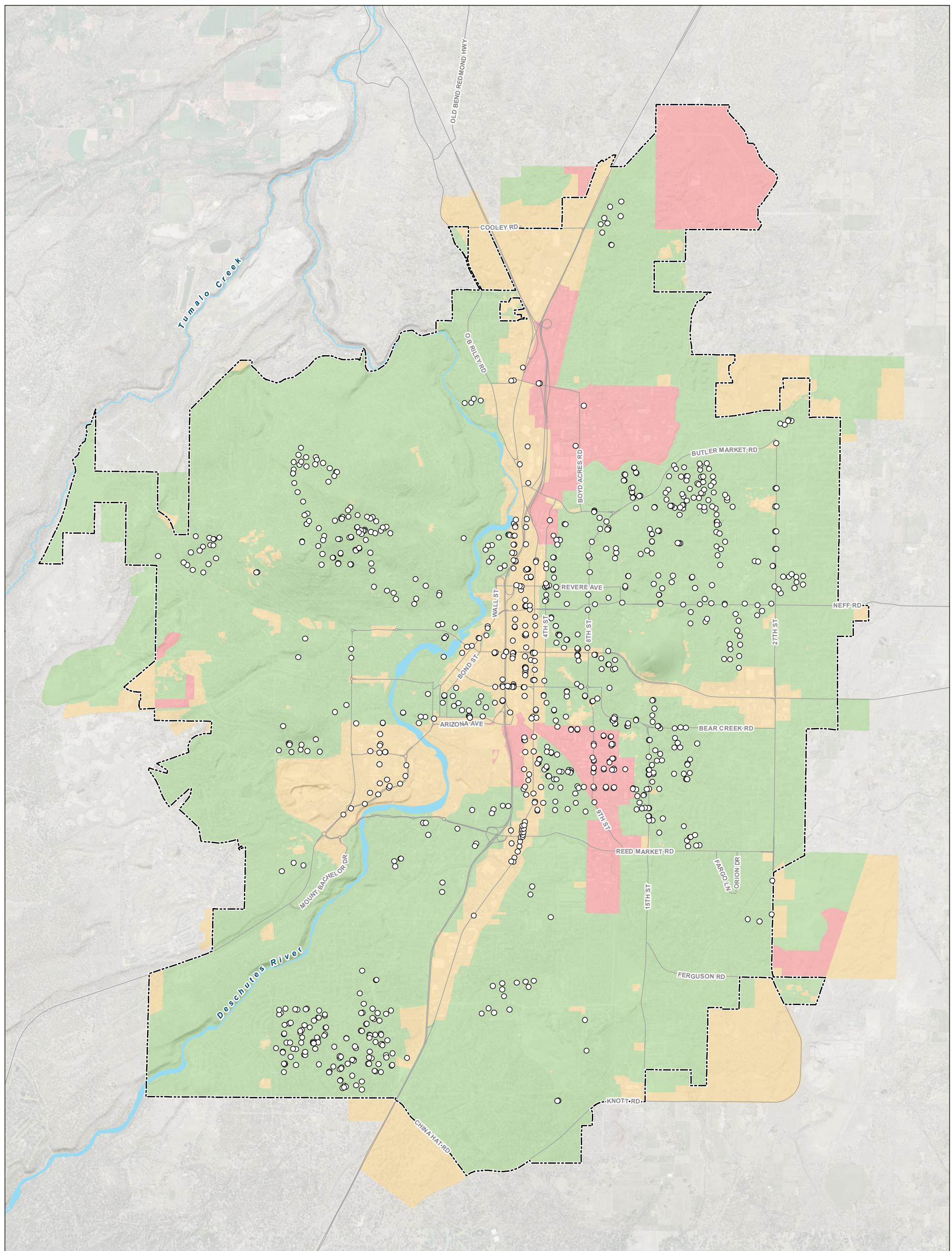
#### Areas that Meet Siting Criteria

City of Bend Modified Drywell Siting Criteria and Drillhole Decommissioning Framework

Date: July 3, 2024

Data Sources: City of Bend, ESRI, ODOT, USGS, Aerial Photo 2022





#### LEGEND

- Drillhole
- Land Use Risk**
  - High Risk: Industrial
  - Moderate Risk: Commercial, Mixed-Use, Public Facility (AND >50% Impervious), Urban Area
  - Low Risk: Public Facility (AND <50% impervious), Professional Office, Residential

#### All Other Features

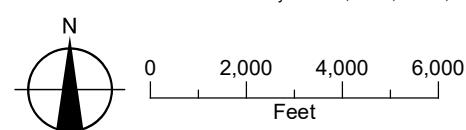
- City Boundary
- Major Road
- Watercourse
- Waterbody

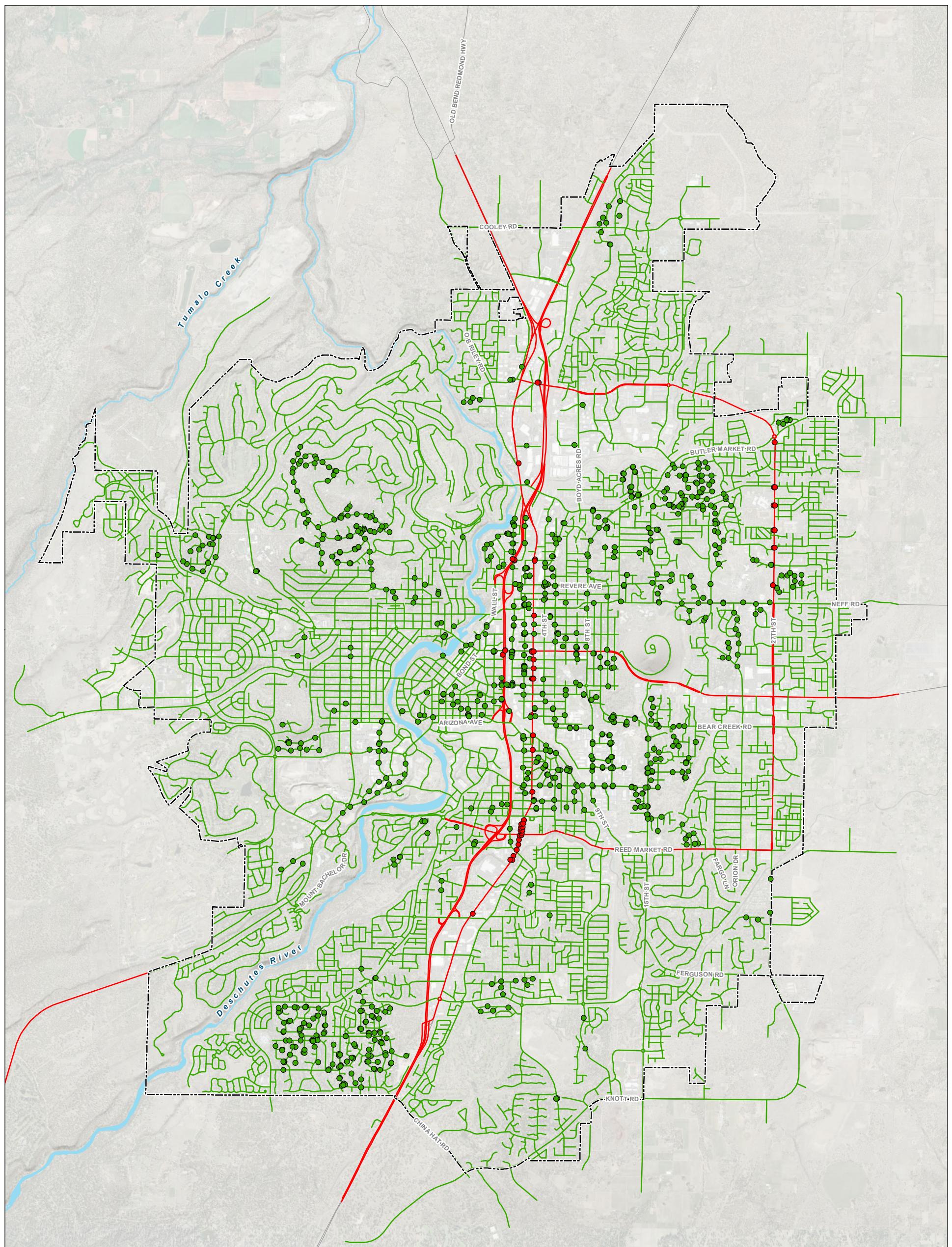
#### FIGURE 3

#### Land Use

City of Bend Modified Drywell Siting Criteria and Drillhole Decommissioning Framework

Date: July 3, 2024  
Data Sources: City of Bend, ESRI, ODOT, USGS, Aerial Photo 2022





#### LEGEND

##### Drillhole

- High Risk
- Low-Moderate Risk

##### Traffic Volume Risk

- ✓ High Risk: >1,000 Trips per Day
- ✓ Low-Moderate Risk: <1,000 Trips per Day

##### All Other Features

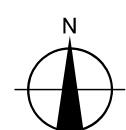
- City Boundary
- ✓ Major Road
- ✓ Watercourse
- ✓ Waterbody

#### FIGURE 4

##### Traffic Volume

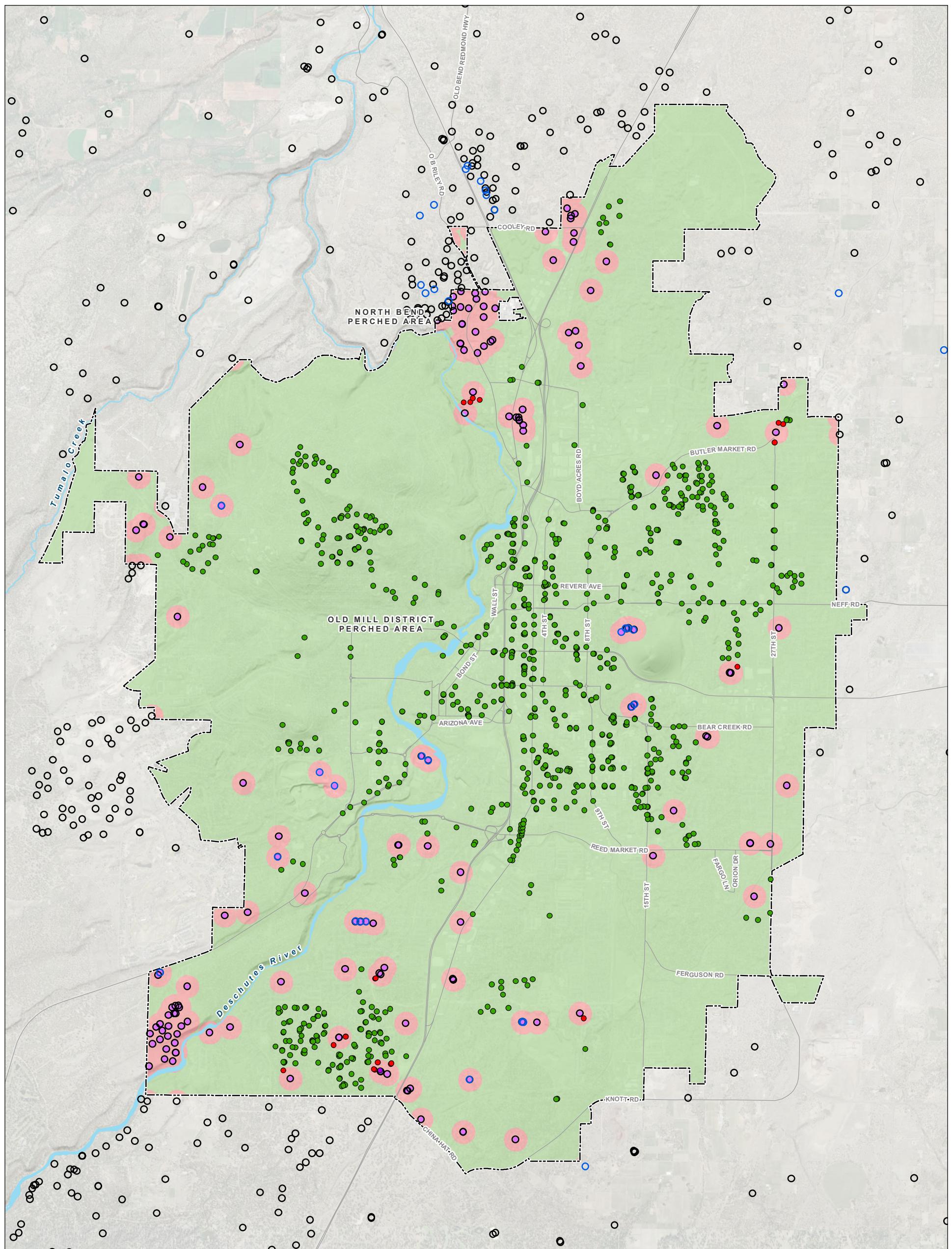
City of Bend Modified Drywell Siting Criteria and Drillhole Decommissioning Framework

Date: July 3, 2024  
Data Sources: City of Bend, ESRI, ODOT, USGS, Aerial Photo 2022



0 2,000 4,000 6,000  
Feet





#### LEGEND

○ Drillhole	All Other Features
○ Private Water Well	□ City Boundary
○ Public Water Well	~~~~ Major Road
<b>Risk Assigned to Water Well Locations</b>	
■ Extra High Risk: <100 ft from water well	~~~~ Watercourse
■ High Risk: <500 ft from water well	~~~~ Waterbody
■ Low Risk: >500 ft from water well	

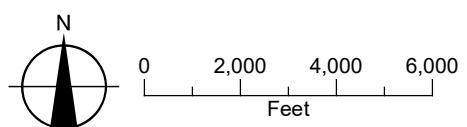
**FIGURE 5a**

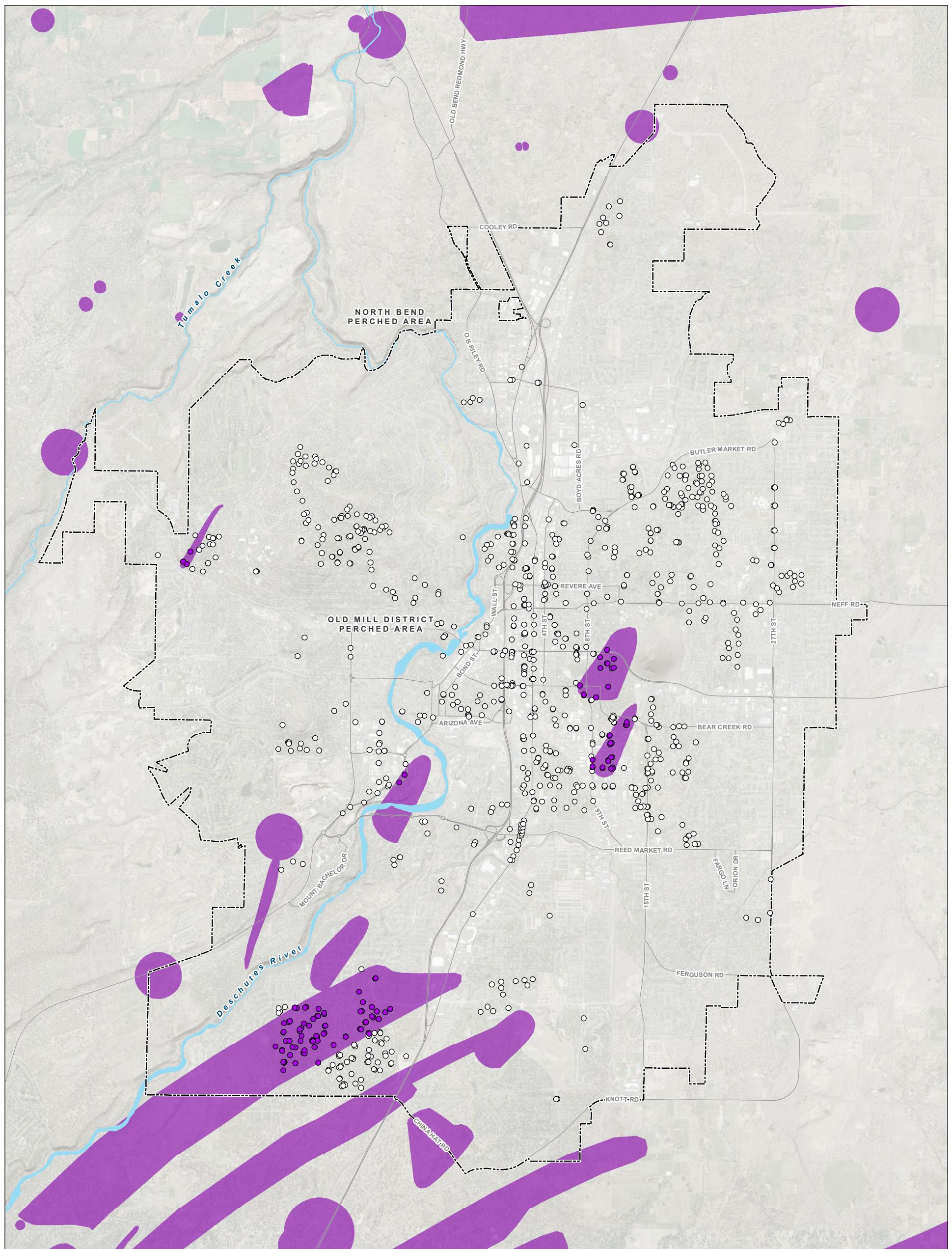
#### Risk Assigned to Water Well Locations – Distance from Water Wells

City of Bend Modified Drywell Siting Criteria  
and Drillhole Decommissioning Framework

Date: July 3, 2024

Data Sources: City of Bend, ESRI, ODOT, USGS, Aerial Photo 2022





#### LEGEND

- Drillhole
- Extra High Risk: Two-year time-of-travel of a public water well zones

#### All Other Features

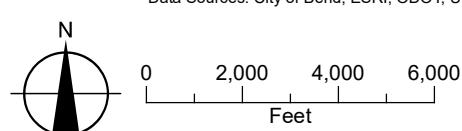
- City Boundary
- △ Major Road
- ~~~~ Watercourse
- ~~~~ Waterbody

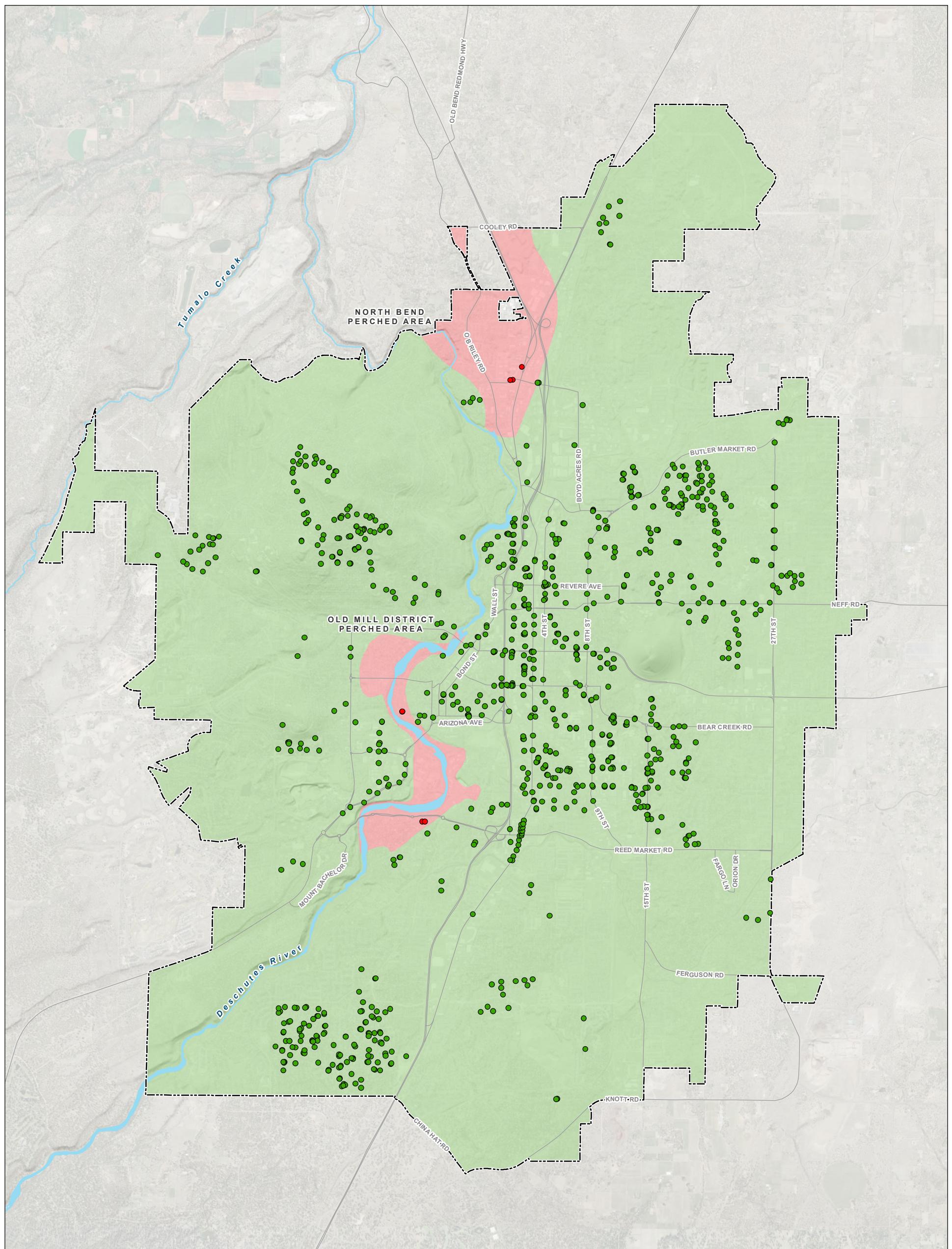
**FIGURE 5b**

#### Risk Assigned to Water Well Locations – Risk to Public Water Wells

City of Bend Modified Drywell Siting Criteria  
and Drillhole Decommissioning Framework

Date: July 3, 2024  
Data Sources: City of Bend, ESRI, ODOT, USGS, Aerial Photo 2022





#### LEGEND

○ Drillhole

#### Risk Assigned to Water Well Locations

- Low Risk: Outside of a perched groundwater area
- High Risk: Areas of perched groundwater
- Extra High Risk: Areas of perched groundwater AND <53 ft vertical separation from groundwater

#### All Other Features

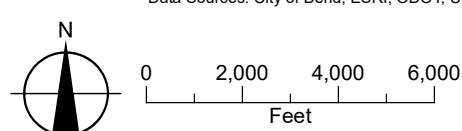
- City Boundary
- ✓ Major Road
- ~ Watercourse
- Waterbody

#### Risk Assigned to Water Well Locations - Perched Groundwater within the "North Bend Perched Area" or the "Old Mill District Perched Area"

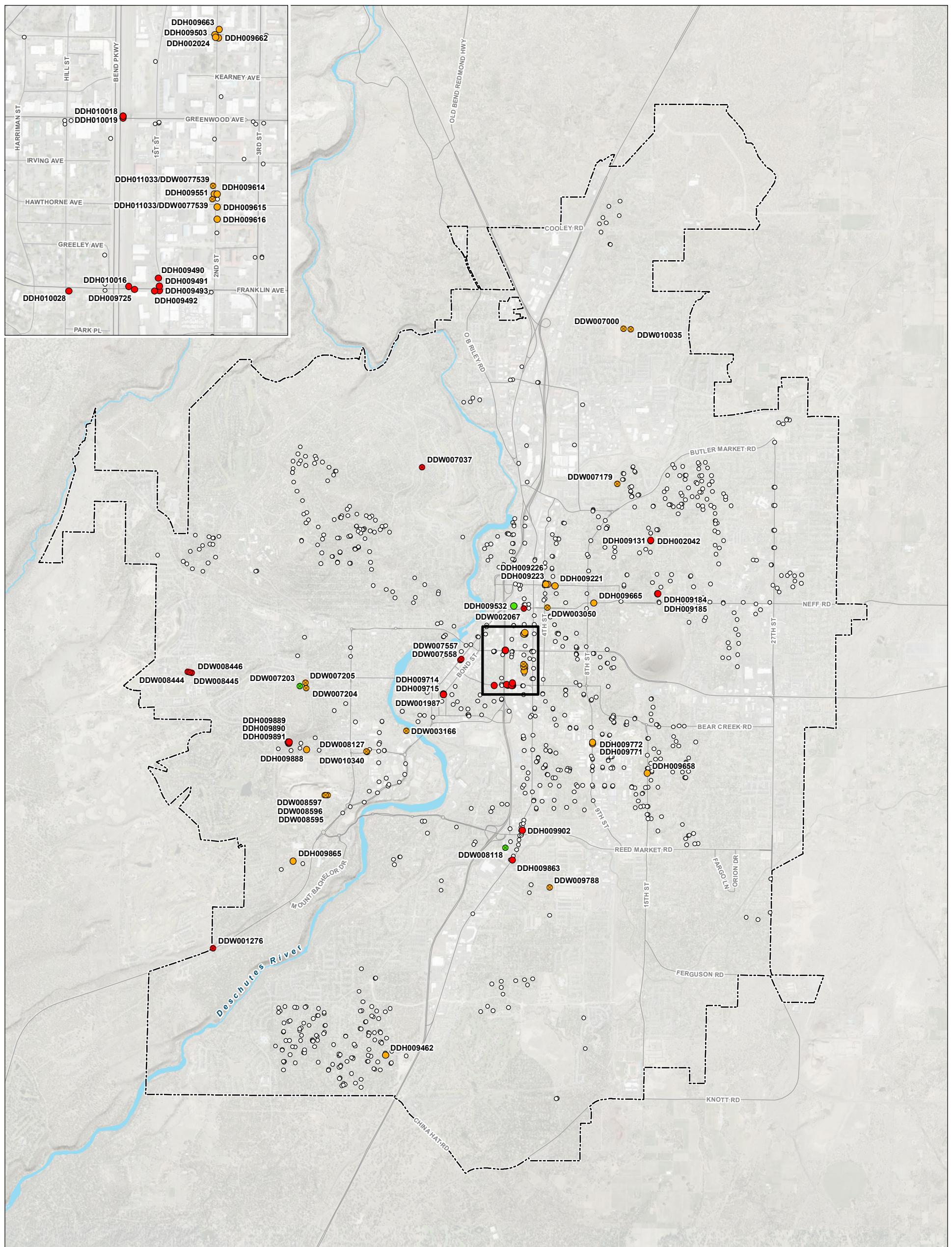
City of Bend Modified Drywell Siting Criteria and Drillhole Decommissioning Framework

Date: July 3, 2024

Data Sources: City of Bend, ESRI, ODOT, USGS, Aerial Photo 2022



**FIGURE 5c**



#### LEGEND

○ Drillhole  
 ✕ Dry Well

#### Risk Level Priority

- High Risk: Level 1
- Moderate Risk: Level 2
- Low Risk: Level 3

#### All Other Features

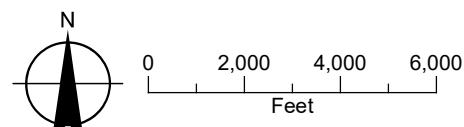
- City Boundary
- △ Major Road
- ~~~~ Watercourse
- ~~~~ Waterbody

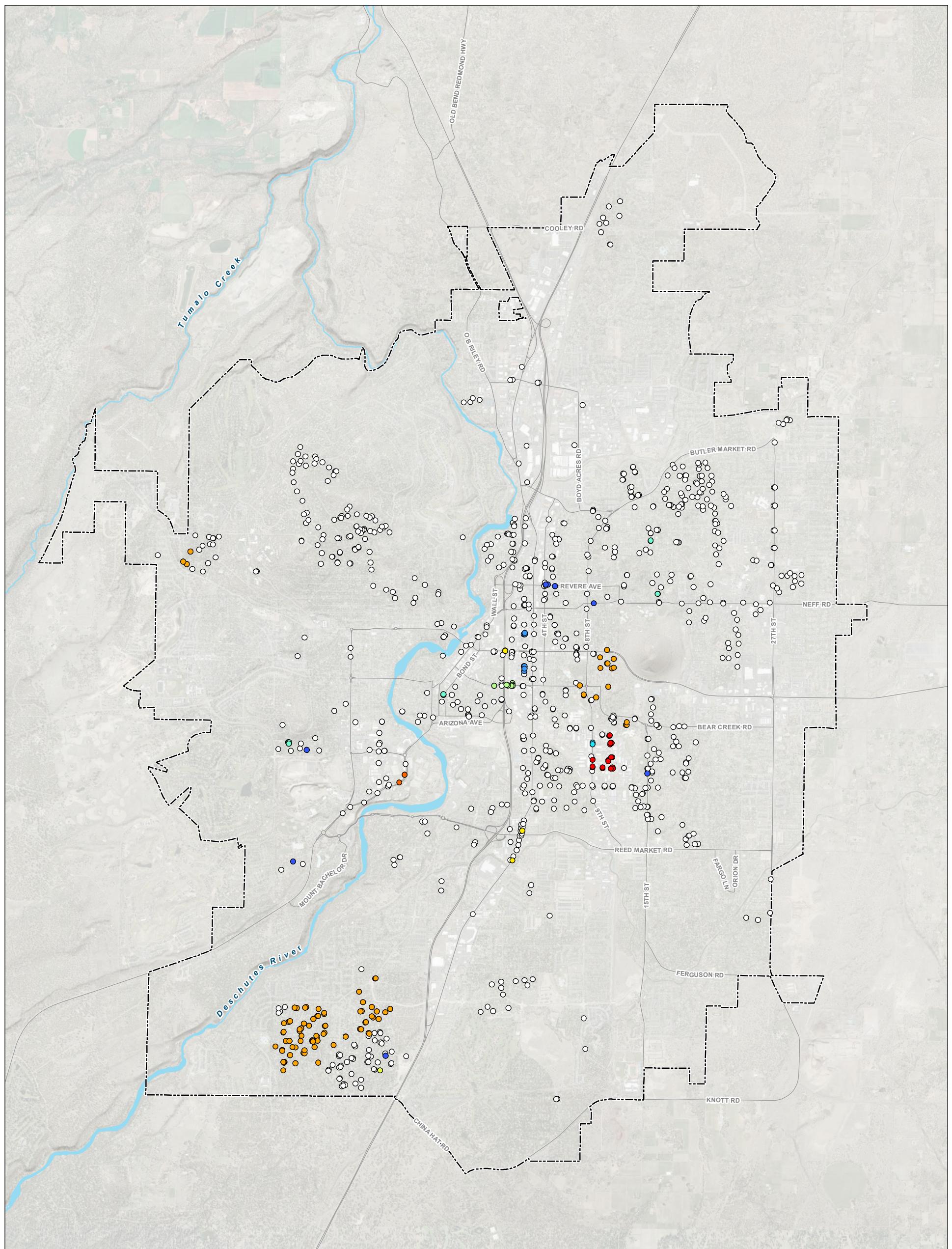
**FIGURE 6**

#### Current Drill Hole Conditions

City of Bend Modified Drywell Siting Criteria  
 and Drillhole Decommissioning Framework

Date: July 3, 2024  
 Data Sources: City of Bend, ESRI, ODOT, USGS, Aerial Photo 2022





#### LEGEND

##### Drillhole Priority Rank (Quantity)

- 1 (17)
- 2 (2)
- 3 (91)
- 4 (4)
- 5 (1)

##### 6 (7)

##### 7 (9)

##### 8 (2)

##### 9 (8)

##### 10 (9)

##### >10 (960)

##### All Other Features

##### City Boundary

##### Major Road

##### Watercourse

##### Waterbody

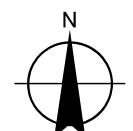
**FIGURE 7**

### Priority Ranking

City of Bend Modified Drywell Siting Criteria  
and Drillhole Decommissioning Framework

Date: July 3, 2024

Data Sources: City of Bend, ESRI, ODOT, USGS, Aerial Photo 2022



0 2,000 4,000 6,000  
Feet



# Bend Stormwater Master Plan

## CIP Rating Criteria - UPAG Discussion Draft

7/31/24

Weight	High Score	Max Total	Criterion	Description	Scoring Concept
<b>1. Conveyance &amp; Flooding</b>					
1.00	5	5.00	Frequency of Flooding Event	Does the project reduce flooding and if yes, for flooding at what frequency?	Projects that address more frequent floods receive more points.
1.00	5	5.00	Flooding Severity/Risk Avoidance	What types of properties or assets will be protected from flooding under this project? What risks to the traveling public will be avoided under this project?	Projects that address flooding that damages private property or has serious traffic impacts receive more points.
<b>Max points</b>		<b>10.00</b>			
<b>2. Water Quality Improvements</b>					
3.00	5	15.00	Surface Water and Groundwater Protection	Did the drill hole or outfall rate highly in a needs analysis to identify UICs or outfalls that are most in need and best suited to water quality retrofit?	Projects that address already-prioritized drillholes and outfalls receive more points.
1.00	5	5.00	Permit Compliance	Does the project assist in meeting WPCF or MS4 Permit requirements?	Projects that assist in meeting WPCF or MS4 Permit requirements receive more points.
<b>Max points</b>		<b>20.00</b>			
<b>3. Multiple Benefits</b>					
0.75	5	3.75	Increases Equitable Distribution of Public Stormwater Assets	Does the project provide drainage and stormwater management where public storm system is lacking OR does the project serve a location with a traditionally underserved population identified by City of Bend?	Projects that are located where City storm system is not present and that will serve populations living 200% below the federal poverty level (by Census Block Group) or have a relatively high minority populations receive more points. Point values gradually reduce as poverty and minority population percentages reduce.
0.25	5	1.25	System Longevity	Does the project rehabilitate an existing asset or improve the function or longevity of an existing asset?	Projects receive either maximum points or no points.
0.25	5	1.25	Synergy	Is it a "Synergy" project?	Projects receive either maximum points or no points.
0.50	5	2.50	Maintenance Safety/Access	Does the project improve the ease of maintenance and/or safety of staff during maintenance?	Projects receive either maximum points or no points.
0.25	5	1.25	Community Partnerships	Will the project be developed in partnership with an organization such as Bend Park and Recreation District or Upper Deschutes Watershed Council?	Projects receive either maximum points or no points.
1.00	5	5.00	Supports Housing or Economic Development	Does the project support urban renewal or production of middle or affordable housing?	Projects receive maximum points if they are located at the intersection of 3 types of City focus areas listed here; points reduce with fewer types of focus areas: - Urban Renewal District - Economic Improvement District - Enterprise Zone - Opportunity Area
<b>Max points</b>		<b>15.00</b>			
<b>4. Recognized Priority Projects</b>					
2.00	5	10.00	Staff Priority	Is the project an agreed priority for City staff?	Points are awarded based on City Utilities Operations staff priorities (1-3). One point is available for Engineering and Compliance staff priorities.
1.00	5	5.00	UPAG Priority	Did the project receive support when presented to the Utilities Public Advisory Group?	Points are graduated based on degree of support from UPAG.
<b>Max points</b>		<b>15.00</b>			
<b>5. Feasibility &amp; Cost</b>					
1.00	5	5.00	Complexity / Site Constraints	Does a physical condition such as proximity to a water well, landslide, or unfractured bedrock or need to acquire significant property mean that a solution is likely higher cost than a similar project in a less complex location?	Projects receive more points when they have less complex site conditions. Site conditions may not be known when scoring. Engineering judgement and information from City staff will be used to score.
1.00	5	5.00	Low Cost	Is the project a low-cost solution?	Projects with low initial capital costs and low ongoing maintenance costs receive maximum points. Points reduce with higher capital cost and higher ongoing maintenance cost.
<b>Max points</b>		<b>10.00</b>			

**Max Points** **70.00**

# Bend Stormwater Master Plan

## CIP Rating Criteria - UPAG Discussion D

7/31/24

Weight	High Score	Max Total	Criterion	Discussion Notes
<b>1. Conveyance &amp; Flooding</b>				
1.00	5	5.00	Frequency of Flooding Event	
1.00	5	5.00	Flooding Severity/Risk Avoidance	Should we move property damage (exterior) to moderate severity?
<b>Max points</b>		<b>10.00</b>		
<b>2. Water Quality Improvements</b>				
3.00	5	15.00	Surface Water and Groundwater Protection	UPAG indicated that protecting groundwater and protecting the Deschutes are top priorities.
1.00	5	5.00	Permit Compliance	Most projects that receive a 5 score above will also receive this score. Other projects that may receive this score could have education components, illicit discharge elimination components, or source control components.
<b>Max points</b>		<b>20.00</b>		
<b>3. Multiple Benefits</b>				
0.75	5	3.75	Increases Equitable Distribution of Public Stormwater Assets	Exact scoring criteria will be further discussed with Bend Long Range Planning. First, it acknowledges that some areas of the City have little public drainage infrastructure. Second, it gives additional points to any project within an area designated as having a traditionally underserved population. The definitions and extents of these areas are under discussion.
0.25	5	1.25	System Longevity	UPAG indicated equal priority with extending the lives of current facilities and building new facilities. Other programmatic solutions may also address repair/replacement of existing infrastructure.
0.25	5	1.25	Synergy	
0.50	5	2.50	Maintenance Safety/Access	
0.25	5	1.25	Community Partnerships	
1.00	5	5.00	Supports Housing or Economic Development	Exact scoring criteria will be further discussed with Bend Long Range Planning. There is an underserved population map ( <a href="https://www.bendoregon.gov/government/departments/bend-metro-planning-organization/transportation-data/demographic-and-population-data">https://www.bendoregon.gov/government/departments/bend-metro-planning-organization/transportation-data/demographic-and-population-data</a> ) that may assist. A lot of grants are heavily weighting project impact to community and disadvantaged communities.
<b>Max points</b>		<b>15.00</b>		
<b>4. Recognized Priority Projects</b>				
2.00	5	10.00	Staff Priority	
1.00	5	5.00	UPAG Priority	We may also ask the general public for input, depending on the roll-out of the public involvement plan. We would use general public input to finalize the priority order later, when writing the implementation plan.
<b>Max points</b>		<b>15.00</b>		
<b>5. Feasibility &amp; Cost</b>				
1.00	5	5.00	Complexity / Site Constraints	
1.00	5	5.00	Low Cost	We will be asking for City Utilities Operations staff input on ongoing maintenance cost of various facility types.
<b>Max points</b>		<b>10.00</b>		

**Max Points** **70.00**