



Annual Report

MS4 Phase II General Permit

National Pollutant Discharge Elimination System

MS4 Stormwater Discharge Permit

**2021-2022
Monitoring Year**

**City of Keizer
October, 2022**

#100032

1.0 Certification and Signature

1. Permit Registrant(s): **City of Keizer**
2. Legally Authorized Representative: **Bill Lawyer**
3. Title: **Public Works Director**
4. Email: **LawyerB@keizer.org**
5. Phone: **503-856-3555**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations (40 CFR 122.22(d)).

Signature: _____

Date: _____

10/27/22

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Instructions

At least once per year, the permit registrant must evaluate compliance with the requirements of the MS4 Phase II general permit using this Annual Report template. This self-evaluation includes assessment of progress made towards implementing the SWMP control measures in Schedule A, and implementation of actions to comply with any additional requirements identified pursuant to Schedule D.1 (Requirements for Discharges to Impaired Waterbodies).

For each SWMP control measure or activity listed below, please answer all the questions and in the comments field cite any relevant information and/or statistics that helps to illustrate implementation or compliance. If your answer is “No,” in the comments field explain the reasons and outline the anticipated implementation timeline. If the requirement does not apply, explain why it is not applicable in the comments field.

No later than November 1 each year, beginning in 2020, the permit registrant must submit an Annual Report to DEQ. One signed copy and one electronic copy must be submitted to DEQ using the address provided in permit. DEQ can provide an FTP site for submittal of the electronic copy, upon request.

2.0 General Information
2.1 Registrant Information

6. Permit Registrant(s): City of Keizer

7. Type(s): City / County / Special District / Other:

8. Registrant Type:
Existing Registrant: New Registrant:

9. Community Type:
Large Community: Small Community:

10. DEQ Permit No: 100032

11. EPA File No: ORS100032

12. Physical Address: 930 Chemawa Rd NE

City: Keizer	State: OR	Zip: 97303
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13. Point of Contact: Bill Lawyer

Title: Public Works Director	Email: lawyerb@keizer.org	Phone: 503-856-3555
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14. Mailing Address (if different):

City:	State:	Zip:
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2.2 Municipal Separate Storm Sewer System (MS4) Information

15. Estimate the area in square mileage served by the MS4: approximately 7.5 square miles

16. Estimate the population served by the MS4: 39,400

2.3 MS4 Stormwater Discharge Information
Identify the names of all known waters that receive a discharge from your MS4.

Receiving Waterbody	# of Outfalls	Impaired waterbody		Impairment(s)
		303d listed	TMDL issued	
a. Willamette River	14	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Bacteria, Mercury, Temperature
b. Claggett Creek	33	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Bacteria, Mercury, Temperature
c. Labish Ditch	24	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
d.		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
e.		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
f.		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
g.		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
h.		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
i.		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
j.		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	

2.4 Coordination Among Registrants and Joint Agreements

Required for permit registrants relying on another entity to satisfy one or more of the requirements of the permit.

17. Is there a joint agreement in place for the implementation of one or more stormwater management program control measures? *Schedule A.2* Yes No
18. If yes, has there been any change to the joint agreement(s) submitted previously? Yes No
If yes, include, as an attachment, a summary of the changes.
NA

2.5 Stormwater Management Program Information

19. Discuss the status and overall progress of establishing legal authority to control pollutant discharges into and discharges from the MS4 and to implement and enforce the conditions of this permit. *Schedule A.2.c*

The City implements and enforces the conditions of its permit primarily through the following:

- Stormwater Utility Fee Ordinance (#2014-563) – establishes City policy to secure funding for implementation of stormwater management plans, programs, operations and maintenance.
- Stormwater Discharge Control Ordinance (#2022-582) – provides legal authority to prohibit non-stormwater discharges/connections to the storm drain system.
- Erosion Control Ordinance (#2014-711) – provides legal authority to control erosion and pollution from land disturbing activities including those related to development or redevelopment through a required permit process.
 - Status: evaluated for compliance with the new permit; updates will be completed as necessary on or before Feb. 28, 2023.
- Civil Infraction Ordinance (#86-063) – establishes the legal procedure for addressing violations of City ordinances as civil infractions.
 - Status: evaluated for efficacy; any updates will be completed on or before Feb. 28, 2023.
- City of Keizer Development Code Ordinance (#87-078) – establishes requirements for conforming land uses in the City including the use of all land, as well as the construction, reconstruction, enlargement, structural alteration, use, or occupation of any structure within the City of Keizer.
 - Status: development code is currently being evaluated for compliance with the post-construction minimum control measure requirements and will be updated as necessary on or before Feb. 28, 2023.
- Private Maintenance Agreements – legal contract between the City and a property owner that is filed with Marion County and recorded on the property deed. The agreement establishes maintenance requirements of private stormwater facilities to ensure proper, long-term operation.

2.6 Stormwater Management Program Information

20. Is an updated SWMP Document attached? *Schedule A.2.c*
Yes No (must be submitted with the second Annual Report)

If necessary, provide an explanation:

The SWMP Document was submitted during the 2020-2021 Annual Report. It is available on the City's [website and can be found here](#).

21. Identify the publicly accessible website where the SWMP Document is posted. *Schedule 2.c & A.3.b.ii*
<https://www.keizer.org/environmental-reports>

If necessary, provide an explanation:

22. Does the SWMP Document include an implementation schedule for control measures that have yet to be or are partially implemented? *Schedule A.2.c*
Yes No

If necessary, provide an explanation:

23. Describe the method used to gather, track, and use SWMP information to set priorities or assess compliance: *Schedule A.2.d*
The SWMP Document includes implementation schedules for each BMP within the six minimum control measures. Each BMP includes established goals and measurable objectives. An annual review of these measurable goals allows

our staff to assess compliance and set strategies for achieving goals. Staff continues to track implementation using a variety of methods such as digital files, paper records, geodatabases, spreadsheets, and report forms as appropriate to document compliance efforts. Tracking mechanisms are designed to align with the reporting requirements.

24. Have adequate finances, staff, equipment and other support capabilities been provided to implement the permit?

Schedule A.2.e

Yes No

If necessary, provide an explanation:

The Environmental & Technical Division, who are responsible for implementing programs, is made up of one Division Manager, one Senior Environmental Program Coordinator, one Education and Outreach Coordinator, one Environmental Compliance Specialist and one GIS Analyst (who works across Public Works). Funding is provided through stormwater utilities.

25. During this monitoring year was compliance with the requirements of this permit evaluated? *Schedule B.1*

Yes No

If necessary, provide an explanation:

26. During this monitoring year was it determined or reported that discharge from the MS4 caused or contributed to an excursion of an applicable water quality standard? *Schedule A.1.a*

Yes No

If "Yes", complete section 3.7, Water Quality Standards of this template.

3.0 Stormwater Management Program Control Measures

3.1 Public Education and Outreach

27. Provide a brief summary of the ongoing public education and outreach program. *Schedule A.3.a*

PE-1 Implement a Public Education and Outreach Program

- The City continued to implement the Public Education and Outreach Program during the report year.
- The City exceeded the requirements outlined in Schedule A.3.a through implementation of the Public Education Plan (PEP), which outlines specific activities planned for each year of the permit, as well as target audiences, target messages and unique performance measures for each activity.
- The PEP was reviewed during the report year to assess program compliance, efficacy and progress.

The PEP includes educational activities to comply with the City's TMDL Implementation Plan and WPCF Class V Stormwater Permit.

PE-2 Offer Stormwater Education Activities

- Nineteen stormwater education activities were implemented, exceeding the requirement.
- All Year 3 activities performed were evaluated and the information has been applied to improve Year 4 activities and goal-setting.

PE-3 Deliver Target Topics to Target Audiences

- Education and Outreach activities addressed a variety of target topics, including impacts of illicit discharges, impacts of impervious surfaces, BMPs for pesticide and fertilizer use, BMPs for litter and trash control and watershed awareness.
- Staff provided stormwater education and outreach to all three target audiences during the report year.

PE-4 Provide Education to Construction Professionals

- The City co-hosted the 11th annual Erosion Control & Stormwater Management Summit with the Mid-Willamette Outreach Group to provide stormwater education to construction professionals and municipal stormwater staff.
- Staff also created updated Erosion Control Permit and Erosion Control BMP outreach information for construction site operators, which is available online and at the Public Works permit counter.

28. Were the required components in place by the implementation date? *Schedule A.3.a.i*

Yes No (*Implementation date: Feb. 28, 2020 for Existing Registrants and Sept. 1, 2023 for New Registrants*)

29. Provide the number of education and outreach activities conducted: *Schedule A.3.a.iii*

During this reporting year: 19

30. During the permit term: 42

If necessary, provide an explanation:

Please refer to the [Public Education Plan](#) for descriptions of the Year 3 activities.

31. Indicate target audiences addressed during this reporting year: *Schedule A.3.a.iv*

- General public, homeowners, homeowner association, schoolchildren, and businesses
- Local elected officials, land use planners and engineers
- Construction site operators

32. Have each target audience been addressed during the permit term? *Schedule A.3.a.iv*

Yes No

33. Indicate target topics addressed during this reporting year: *Schedule A.3.a.iv*

<input checked="" type="checkbox"/> Impacts of illicit discharges on receiving waters and how to report them <input checked="" type="checkbox"/> Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts <input checked="" type="checkbox"/> BMPs for proper use, application and storage of pesticides and fertilizer <input checked="" type="checkbox"/> BMPs for litter and trash control <input checked="" type="checkbox"/> BMPs for recycling programs <input type="checkbox"/> BMPs for power washing, carpet cleaning and auto repair and maintenance <input checked="" type="checkbox"/> Low impact development/green infrastructure <input type="checkbox"/> Information pertaining to maintenance of septic systems <input checked="" type="checkbox"/> Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife <input checked="" type="checkbox"/> Other: TMDL criteria – temperature; WPCF criteria – UIC maintenance, infiltration and ground water protection
<p>34. Describe the types of educational messages or activities distributed and/or offered during this reporting year. <i>Schedule A.3.a.iii</i></p> <p>The City offered a variety of educational messages and activities throughout the year. Here is a sample of some of the activities and their associated messaging:</p> <ul style="list-style-type: none"> • Consumer Confidence Report mailer to all Keizer residents – highlighting pollution prevention and illicit discharge reporting • World Water Day Scavenger Hunt at local parks – highlighting watershed awareness facts • Social Media Campaigns – highlighting pollution prevention & lawn care, pesticide & fertilizer BMPs • Business outreach to pet groomers – sharing pet waste education materials to their customers • Adopt-A-Street Program – highlighting pollution prevention & litter control BMPs • Trashy Tuesday Litter Cleanups – highlighting pollution prevention, litter control BMPs & watershed awareness • Outdoor School & Salmon Watch – teaching water quality sampling, riparian habitat, watershed awareness & salmon lifecycles to students • Community Earth Day – highlighting watershed awareness, pollution prevention & litter control BMPs • Erosion Control Summit – teaching erosion control BMPs to construction site operators & engineers • Erosion Control Packet – packet sharing erosion control permitting requirements & recommended erosion control BMPs to construction site operators
<p>35. Was outreach to construction site operators working within your community offered during this reporting year? <i>Schedule A.3.a.v</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>36. Total number during the permit term: 3</p>
<p>37. Identify and describe the assessment/evaluation of, at least, one education and outreach activity that occurred during this reporting year. Include the assessment process or metric for evaluation, and why this activity was considered successful. <i>Schedule A.3.a.vi</i></p> <p>Environmental staff conduct an annual review and evaluation of the Public Education Plan (PEP), which involves scoring and evaluating the reach and effectiveness of each education and outreach activity performed that year. While the City evaluates each activity, the lowest performing activities are evaluated with more scrutiny in order to improve overall program effectiveness. Based on the performance metrics, Activity 4 from the Public Education Plan (Utilize social media campaigns and Keizer’s website as an educational tool), scored the highest during this report year due to audience reach and engagement as well as its efficient use of resources. The City made a concerted effort to provide valuable content through social media and as a result there was an increase in Page Followers as well as overall engagement during the reporting year. In the past, this has been an undervalued tool for outreach, but was shown successful upon evaluation because of the ability to reach a wide audience. This is a tool that the City will continue to utilize to share education and outreach materials and stormwater messaging.</p>
<p>38. Will the assessment be used to inform future stormwater education and outreach efforts? <i>Schedule A.3.a.vi</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>39. Provide an explanation:</p> <p>The evaluation of the PEP provides a ranking for all of the completed annual activities, highlighting which activities were successful and what made them successful. This evaluation also provides an analysis on what to improve with each activity</p>

that ranked low. The evaluation is used during the annual PEP development and budgeting, to determine which activities should be continued, altered or discontinued.

3.2 Public Involvement and Participation
<p>40. Provide a brief summary of the overall progress towards implementation of this control measure. <i>Schedule A.3.b</i> The City exceeded these requirements by implementing a number of public involvement opportunities including:</p> <ul style="list-style-type: none"> • Public Stormwater Advisory Committee (SWAC) meetings – Public meetings allowing public comment on upcoming stormwater related policies and programs • Publicly accessible website with contact information and all related documents posted • Trashy Tuesday Litter Cleanup Stewardship events • Great Willamette Cleanup / Community Earth Day Cleanup stewardship events
<p>41. Were the required components in place by the implementation date? <i>Schedule A.3.b.i</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (Implementation date: Feb. 28, 2020 for Existing Registrants and Sept. 1, 2023 for New Registrants)</p>
<p>42. Is the SWMP Document posted on a publicly accessible website? <i>Schedule A.3.b.ii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>43. Was the publicly accessible website updated during this reporting year? <i>Schedule A.3.b.ii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: Updates and additions: staff contact information, 2020-2021 annual reports; SWMP Document sections, public outreach events, ordinance updates, Erosion Control Program, Pollution Reporting updates, Adopt-A-Street, street sweeping page, SWAC meeting agenda and minutes.</p>
<p>44. Does the publicly accessible website include illicit discharge complaint/reporting information or procedures? <i>Schedule A.3.b.ii.A</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: Online ID Report Tool</p>
<p>45. Does the publicly accessible website include draft documents issued for public comment, final reports, plans and other official SWMP policy documents? <i>Schedule A.3.b.ii.B</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: Stormwater Regulation - Document Library</p>
<p>46. Does the publicly accessible website include links to all ordinances, policies and/or guidance documents related to the construction and post-construction stormwater management control programs, including education, training, licensing, and permitting? <i>Schedule A.3.b.ii.C</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: Additional permitting information found here: Erosion Control Program</p>
<p>47. Does the publicly accessible website include contact information for relevant staff, including phone numbers, mailing addresses and email addresses? <i>Schedule A.3.b.ii.D</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: Environmental Division Home Page - Point of Contact</p>
<p>48. During this reporting year, was a stewardship opportunity created or partnered with another entity? <i>Schedule A.3.b.iii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If “Yes”, summarize the stewardship opportunity(s). The City continued to implement a stewardship opportunity designed to garner public participation in protecting waterways through a series of litter clean-up events located near waterways or stormwater drainages. The program, called Trashy Tuesday, runs from June through September and consists of a series of litter clean-up events, which are held on the third Tuesday of the month. The Trashy Tuesday events have hosted 36 volunteers and removed 172 pounds of litter from our streets and riparian areas. The City also partnered with the Willamette Riverkeeper to host a Community Earth Day event, which offered an on-the-water litter clean up at Keizer Rapids Park.</p>

3.3 Illicit Discharge Detection and Elimination

49. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.c*

ID-1 Implement an Illicit Discharge Detection and Elimination Program

- The City continued to implement the Illicit Discharge Detection and Elimination Program during the report year.
- The updated IDDE Ordinance (#2022-842) was adopted prior to February 28th, 2022.
- The IDDE Plan was updated to comply with the new requirements.

The IDDE Plan includes activities that comply with the TMDL Implementation Plan and the WPCF permit.

ID-2 Maintain a Map and Digital Inventory of the MS4

- The City maintained a map and digital inventory of the MS4. Data collection is on-going.

ID-3 Prohibit Illicit Discharges by Ordinance

- The City prohibited illicit discharges through the Stormwater Discharge Control Ordinance (2022-842).

ID-4 Maintain Enforcement Procedures

- Staff updated and followed an Enforcement Response Plan (ERP) to address violations through education, corrective actions, and enforcement.
- The ERP includes escalating enforcement and timelines for achieving compliance.

ID-5 Conduct Dry-Weather Inspections of Outfalls

- Dry-weather inspections were performed on the public outfalls, exceeding the permit requirements.
- Priority outfalls have been identified; all priority outfalls are inspected by staff annually.
- Field screening activities include Pollutant Parameter Action Levels and Laboratory Analysis procedures.

ID-6 Provide IDDE Training to Program Staff

- ID Detection and Response training was provided to all Public Works employees during the report year.
- Staff responsible for responding to complaints were trained to use a mobile GIS application to accurately track the City's complaint response and field detected illicit discharges.

50. Were the required components in place by the implementation date? *Schedule A.3.c.i*

Yes No (*Implementation date: Feb. 28, 2022 for Existing Registrants and Sept. 1, 2023 for New Registrants*)

51. Is the MS4 map(s) current? *Schedule A.3.c.ii.A*

Yes No

52. Describe the MS4 map(s) format(s):

Keizer uses ESRI's ArcGIS software which supports shapefiles, feature classes, coverages, tables, databases and geodatabases.

53. Is the MS4 map(s) included as attachment? Yes No

Or are the digital shapefiles available for electronic submittal? Yes No

(Existing Registrants must submit their MS4 map with the third Annual Report; New Registrants must submit by Sept. 1, 2023)

If necessary, provide an explanation:

Please see the attached Exhibit A for the MS4 map.

54. Is the digital inventory of all known outfalls, with the associated receiving waterbody current? *Schedule A.3.c.ii.A*

Yes No

If necessary, provide an explanation:

The City uses GIS to track and manage the outfall inventory. The table in Exhibit A shows a screenshot of the Excel inventory that is pulled from GIS. It contains the receiving waterbody information as well as type, location and other relevant information about the outfall.

55. Indicate if the following features are included on your MS4 map:

- Location of all known outfalls, including the requirements in *Schedule A.3.c.ii.B*
- Stormwater collection and conveyance system, including the requirements in *Schedule A.3.c.ii.C*
- Stormwater structural controls, including the requirements in *Schedule A.3.c.ii.C*
- Location of known chronic discharges *Schedule A.3.c.ii.D*

If necessary, provide an explanation:

<p>There are no known chronic discharges, however, there is a way for the City to track them should they occur.</p>
<p>56. Have non-stormwater discharges into the MS4 been prohibited through enforcement of an ordinance or other regulatory mechanism? <i>Schedule A.3.c.iii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: The City prohibits non-stormwater discharges through the Stormwater Discharge Control Ordinance (2022-842); the ordinance was updated and passed by City Council on February 22, 2022.</p>
<p>57. Indicate which of the following have an ordinance or other regulatory mechanism to prohibit discharge to the MS4: <i>Schedule A.3.c.iii</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Septic, sewage, and dumping or disposal of liquids or materials other than stormwater into the MS4 <input checked="" type="checkbox"/> Discharges of washwater resulting from the hosing or cleaning of gas stations, auto repair garages, or other types of automotive services facilities <input checked="" type="checkbox"/> Discharges resulting from the cleaning, repair, or maintenance of any type of equipment, machinery, or facility, including motor vehicles, cement-related equipment, and port-a-potty servicing, etc. <input checked="" type="checkbox"/> Discharges of washwater from mobile operations, such as mobile automobile or truck washing, steam cleaning, power washing, and carpet cleaning, etc. <input checked="" type="checkbox"/> Discharges of washwater from the cleaning or hosing of impervious surfaces in municipal, industrial, commercial, or residential areas (including parking lots, streets, sidewalks, driveways, patios, plazas, work yards and outdoor eating or drinking areas, etc.) where detergents are used and spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed) <input checked="" type="checkbox"/> Discharges of runoff from material storage areas, which contain chemicals, fuels, grease, oil, or other hazardous materials from material storage areas <input checked="" type="checkbox"/> Discharges of pool or fountain water containing chlorine, biocides, or other chemicals; discharges of pool or fountain filter backwash water <input checked="" type="checkbox"/> Discharges of sediment, unhardened concrete, pet waste, vegetation clippings, or other landscape or construction-related wastes <input checked="" type="checkbox"/> Discharges of trash, paints, stains, resins, or other household hazardous wastes <input checked="" type="checkbox"/> Discharges of food-related wastes (grease, restaurant kitchen mat and trash bin washwater, etc.) <p>If necessary, provide an explanation: The current Stormwater Discharge Control Ordinance (#2022-842) prohibits all of the above.</p>
<p>58. Is the written escalating enforcement and response procedure included as an attachment? <i>Schedule A.3.c.iv</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>(For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023)</i> If necessary, provide an explanation: Please see Appendix B for the Escalating Enforcement Response Plan.</p>
<p>59. Is there a phone number, webpage, and/or other communication channel publicized for the public use to report illicit discharges? <i>Schedule A.3.c.v.A</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Phone number(s) <input checked="" type="checkbox"/> Webpage(s) <input checked="" type="checkbox"/> Other communication channels <p>If necessary, provide an explanation: Online ID Report Tool</p>
<p>60. Provide the number of complaints received during this reporting year. <i>Schedule A.3.c.v.D</i> Number: 49</p>
<p>61. On average, how long did it take to respond to complaints? <i>Schedule A.3.c.v.B</i> In working days: >1 day</p>
<p>62. Provide the number of complaints that included notification of the Oregon Emergency Response System during this reporting year. <i>Schedule A.3.c.v.B</i> Number of notifications: 0</p>

<p>63. Provide the number of complaints where staff performed an investigation during this reporting year. <i>Schedule A.3.c.v</i> Number: 49</p> <p>64. On average, how long did it take to conduct an initial investigation? <i>Schedule A.3.c.v.B</i> In working days: >1 day</p>
<p>65. Provide the number of illicit discharges discovered and eliminated during this reporting year. <i>Schedule A.3.c.v</i> Number: 15 (total number of confirmed illicit discharges – all of which were eliminated.)</p> <p>66. On average, how long did it take to eliminate an illicit discharge? <i>Schedule A.3.c.v.B</i> In working days: 3.5 days</p>
<p>67. Provide the number times escalating enforcement procedure was used to eliminate illicit discharge during this reporting year. <i>Schedule A.3.c.v.D</i> Number of times: 3</p>
<p>Do any of the illicit discharges involve the repair or replacement of the wastewater and/or storm sewer conveyance systems? <i>Schedule A.3.c.v.B</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> If necessary, provide an explanation:</p>
<p>68. Provide the number of illicit discharges that were referred to another entity during this reporting year. <i>Schedule A.3.c.v.C</i> Number: 0</p> <p>69. On average, how long did it take to notify the entity(s)? In working days: NA If necessary, provide an explanation:</p>
<p>70. Indicate which of the following are included in the complaints or reports tracking documentation: <i>Schedule A.3.c.v.D</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Date the complaint was received and, if available, the complainant’s name and contact information <input checked="" type="checkbox"/> Name of staff responding to the complaint <input checked="" type="checkbox"/> Date the investigation was initiated <input checked="" type="checkbox"/> The outcome of the staff investigation <input checked="" type="checkbox"/> Corrective action(s) taken to eliminate the illicit discharge <input checked="" type="checkbox"/> The responsible party for the corrective action(s) <input checked="" type="checkbox"/> The status of enforcement procedure(s), when necessary <input checked="" type="checkbox"/> The date the corrective action(s) was completed and staff who evaluated final compliance <p>If necessary, provide an explanation: Complaint intake and response tracking are managed through a mobile GIS application. Both office and field staff can view, enter, and update incidents in real-time. When a new incident is created/entered, key program staff are automatically notified via email.</p>
<p>71. Provide percentage of outfalls inspected. <i>Schedule A.3.c.vi.A/B</i> Known outfalls screened this reporting year: 83 outfalls (100%)</p> <p>72. Known outfalls screened during the permit term: 107 If necessary, provide an explanation: Over the course of the permit term, several Keizer-owned outfalls have been inspected and determined to either be non-active outfalls or determined to be an outlet, which are categorized differently than an outfall. These outfalls were inspected in previous years, but as of 2021, they are no longer considered to be outfalls according to the General Permit, thus are no longer inspected. As of June 30, 2022, the City has a total of 83 active, Keizer-owned outfalls.</p>
<p>73. Provide percentage of outfalls inspected as part of field screening of priority location. <i>Schedule A.3.c.vi.C</i> Priority location outfalls screened this reporting year: 100%</p> <p>74. Priority location outfalls screened during the permit term: 100% If necessary, provide an explanation:</p>

<p>There are 24 outfalls out of 83 that were determined to be priority outfalls. Each of those 24 are inspected annually. More information about the priority outfalls and methodology can be found in the IDDE Plan attached in Appendix A.</p>
<p>75. Indicate which of the following dry-weather field screening activities have been performed in the last year: <i>Schedule A.3.c.vi</i></p> <p><input checked="" type="checkbox"/> General observation <input type="checkbox"/> Field Screening and Analysis <input type="checkbox"/> Pollutant Parameter Action <input type="checkbox"/> Laboratory Analysis</p> <p>If necessary, provide an explanation: While the dry-weather monitoring procedures, including field screening, pollutant parameter actions levels and laboratory analysis have been developed, no detected flow triggered follow-up field screening or analysis.</p>
<p>76. If flow is observed and the source is unknown, provide a brief description of the field investigation and analysis process. <i>Schedule A.3.c.vi.D,E,G</i></p> <p>When flow is observed, Stormwater Operations staff notify Environmental Division staff and deploy temporary containment measures (e.g., sandbags, valves, berms, absorbents), as appropriate. Environmental staff take measurements such as, temperature, pH, turbidity, specific conductivity, total chlorine, etc. in order to characterize the flow. If illicit discharge is suspected, staff perform reconnaissance to determine the source. When a source is identified, corrective measures and/or enforcement actions are applied as appropriate to eliminate the discharge. When the source is not identified through field screening activities, Environmental staff collect a sample of the flow for laboratory analysis. The laboratory results are used to guide further reconnaissance, which may include TV inspections of storm lines and/or inspections of private property. Additional monitoring within the watershed may be performed to determine if a discharge has impacted a waterway.</p>
<p>77. Have pollutant parameter action levels been established and are they included as an attachment? <i>Schedule A.3.vi.F</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><i>(For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023)</i></p> <p>If necessary, provide an explanation: Pollutant Parameter Action Levels have been established and are included in the IDDE Plan which is attached in Appendix A.</p>
<p>78. Are all persons responsible for investigating and eliminating illicit discharges and illicit connections into the MS4 appropriately trained to conduct such activities? <i>Schedule A.3.c.vii</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation: All Public Works staff received annual Detection and Elimination training; Public Works staff are required to report and respond to illicit discharges and spills.</p>
<p>79. Are all new staff working to implement the IDDE program trained within 30 days of their assignment to this program? <i>Schedule A.3.c.vii</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation: Environmental staff provided training to employees responsible for implementing the program as part of the onboarding process.</p>

3.4 Construction Site Runoff Control
<p>80. Provide a brief summary of the overall progress towards implementation of this control measure. <i>Schedule A.3.d</i></p> <p>EC-1 Implement an Erosion and Sediment Control Program</p> <ul style="list-style-type: none"> • The City continued to implement the Erosion and Sediment Control Program during the report year. • The Erosion Control Manual, including internal SOPs and external outreach materials, has been developed. <p><i>The Erosion Control Program includes activities that comply with the TMDL Implementation Plan and the WPCF permit.</i></p> <p>EC-2 Prohibit Construction Site Runoff by Ordinance</p>

- The City required construction site operators to obtain a permit and submit an erosion-sediment control plan for projects disturbing 2,000 square feet or more through the Erosion Control Ordinance (2014-711). This threshold exceeds the permit requirement.

EC-3 Require NPDES Construction Permits for Large-Scale Projects

- The City maintained 1200-CN permit coverage (through Oregon DEQ), which conditionally authorizes Keizer to issue local permits for large projects between one and five acres.
- The City referred projects disturbing five or more acres (singly or cumulatively) to Oregon DEQ.
- The City referred projects impacting waterways/wetlands to the Dept. of State Lands, the Army Corp. of Engineers, Oregon DEQ, Oregon Dept. of Fish & Wildlife, and other agencies as appropriate.

EC-4 Develop Written Erosion Control Standards

- The City is in the process of developing Erosion Control Standard Details to provide guidance for proper installation and of erosion control measures. The standards will be implemented on or before Feb. 28, 2023.

EC-5 Review Erosion and Sediment Control Plans

- The City required an erosion-sediment control plan for all permitted projects.
- All ESCPs were reviewed using a checklist.

EC-6 Inspect Construction Sites for Compliance

- Public Works staff performed routine site inspections of all permitted projects.
- All staff responsible for performing construction site inspections maintained CESCL Certification.

EC-7 Maintain Enforcement Procedures

- Staff followed an Enforcement Response Plan (ERP) to apply corrective actions and enforcement.

EC-8 Provide Training to Program Staff

- Public Works staff received annual Erosion Prevention and Sediment Control training.
- All staff responsible for performing construction site inspections are CESCL Certified.
- Environmental staff provided training to employees that are directly responsible for implementing the program.

81. Were the required components in place by the implementation date? *Schedule A.3.d.i*

Yes No (Implementation date: Feb. 28, 2023 for Existing Registrants and Sept. 1, 2023 for New Registrants)

The implementation deadline for existing registrants is Feb. 28, 2023.

82. Do ordinances or other regulatory mechanisms require erosion controls, sediment controls, and waste materials management controls to be used and maintained at all qualifying construction projects? *Schedule A.3.d.ii*

Yes No NA

If necessary, provide an explanation:

[Erosion Control Ordinance 2014-711](#)

83. Indicate the minimum land disturbance where construction site operators are required to complete and implement an Erosion and Sediment Control Plan (ESCP) for construction project sites: *Schedule A.3.d.ii*

In square feet or portion of an acre: 2,000 ft² , acres

If necessary, provide an explanation:

A permit is also required for projects that disturb 200 – 1,999 square feet if the site falls within 75’ of the Willamette River or within 50’ of any other waterway. All permitted projects must submit an ESCP; small project plans have fewer requirements than large project plans. Staff review all plans as part of the permit approval process.

84. For construction projects that disturb one or more acres (or that disturb less than one acre, if it is part of a “common plan of development or sale” disturbing one or more acres), provide a brief description of how these projects are referred to DEQ or the appropriate DEQ agent, to obtain a NPDES Construction Stormwater General Permit. *Schedule A.3.d.iii*

The City maintained 1200-CN permit coverage through Oregon DEQ, which conditionally authorizes Keizer to issue 1200-CN permits for large projects between one and five acres. The City refers projects disturbing five or more acres (singly or cumulatively) to Oregon DEQ. This is a part of our project review checklist. The City referred projects impacting waterways/wetlands to the Dept. of State Lands, the Army Corp. of Engineers, Oregon DEQ, Oregon Dept. of Fish & Wildlife, and other agencies as appropriate.

<p>85. Provide the written specifications that address the proper installation and maintenance of such controls during all phases of construction activity as an attachment <i>Schedule A.3.d.iv</i> Attached: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If necessary, provide an explanation: The City referenced standards and specifications (Clean Water Services). Erosion Control Standard Details are being developed and will be implemented on or before Feb. 28, 2023. Please refer to the current standards at the link below: Erosion Prevention and Sediment Control Planning and Design Manual – Clean Water Services</p>
<p>86. Provide the Erosion and Sediment Control Plan template as an attachment. <i>Schedule A.3.d.iv.A</i> Attached: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: The ESCP Template is not attached, but is available to view on our website. Please see the documents:</p> <ul style="list-style-type: none"> • ESCP Small Project Plan Example • Small EC Permit Application Example • Large EC Permit Application Example • Submittal Navigation & Permit Application Checklist
<p>87. Indicate which of the following are required for qualifying construction projects: <i>Schedule A.3.d.iv</i></p> <p><input checked="" type="checkbox"/> Site operator required to complete an ESCP template prior to beginning construction/land disturbance <input checked="" type="checkbox"/> Site operator required to keep the ESCP on site <input checked="" type="checkbox"/> Site operator required maintain and update the ESCP as site conditions change, or as needed. <input checked="" type="checkbox"/> Site operator required to provide the ESCP to the permit registrant, DEQ, or another administrating entity If necessary, provide an explanation:</p>
<p>88. ESCP [from construction projects that will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a “common plan of development or sale” disturbing one or more acres)] are reviewed using a checklist or similar document to determine compliance. <i>Schedule A.3.d.v</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>89. Provide the ESCP review template as an attachment. <i>Schedule A.3.d.v</i> Attached: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Please see Exhibit B in the attached document.</p>
<p>90. Indicate the minimum land disturbance where you require the ESCP to be reviewed, if different than one acre: 2,000 ft² <input checked="" type="checkbox"/>, acres <input type="checkbox"/> If necessary, provide an explanation:</p>
<p>91. All construction projects [that will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a “common plan of development or sale” disturbing one or more acres)] are inspected or scheduled to be inspected at least once per permit term. <i>Schedule A.3.d.vi.A.1</i> Indicate the number of inspections completed to comply with this requirement during this reporting year: 27 Indicate the number of inspections completed to comply with this requirement during the permit term: 83+ If necessary, provide an explanation: Public Works staff performs initial, routine, and final inspections for all permitted projects. Staff also perform inspections in response to complaints and storm events that generate runoff.</p>
<p>92. Are construction projects with visible sediment in stormwater/dewatering discharge or when a complaint is received inspected? <i>Schedule A.3.d.vi.A.2</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>93. Indicate number of projects that were inspected based on this inspection trigger: 1 If necessary, provide an explanation:</p>
<p>94. Indicate the total number of construction projects that were inspected this monitoring year: 52</p>
<p>95. Indicate the total number of construction projects that were inspected during the permit term: 99</p>
<p>96. Indicate which of the following are documented during an inspection: <i>Schedule A.3.d.vi.B</i></p>

<input checked="" type="checkbox"/> That the ESCP is reviewed to determine if the described <input checked="" type="checkbox"/> Control measures were installed, implemented, and maintained appropriately <input checked="" type="checkbox"/> Assessment of the site's compliance with the ordinances or requirements <input checked="" type="checkbox"/> Visual observation of any existing or potential non-stormwater discharges, illicit connections, and/or discharge of pollutants from the site <input checked="" type="checkbox"/> Recommendations to the construction site operator for follow-up <input checked="" type="checkbox"/> Education or instruction provided to the site operator related to stormwater pollution prevention practices If necessary, provide an explanation:
97. If available, provide a copy of the written or electronic inspection report form. <i>Schedule A.3.d.vi.B</i> Attached: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Please refer to Exhibit C in the attached document.
98. For Existing Large Communities: Indicate the number of new construction projects inspected that disturb less one acre during this monitoring year. Is this number at least 25% of the qualifying new construction sites? <i>Schedule A.3.d.vi.C</i> Total number of sites inspected that disturbed less than one acre: 23 (44% of new construction sites) If necessary, provide an explanation:
99. Provide the written escalating enforcement and response procedure as an attachment. <i>Schedule A.3.d.vii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>(For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023)</i> If necessary, provide an explanation: Please see Appendix B for the escalating enforcement response plan.
100. Was the escalating enforcement procedure used to achieve compliance at any construction projects? <i>Schedule A.3.d.vii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Indicate number of times during this reporting year: 7 101. Indicate number of times during the permit term: 30 If necessary, provide an explanation:
102. Were all persons responsible for ESCP reviews, site inspections, and enforcement appropriately trained to conduct such activities? <i>Schedule A.3.d.viii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: Environmental Technicians, who coordinate the Erosion Control Program, are required to obtain CESCL certification within 90 days of hire, or as soon as possible based on training availability. Environmental program staff provided EC training to all Public Works employees.
103. Were all new staff working to implement the construction site runoff control program appropriately trained within 30 days of their assignment to this program? <i>Schedule A.3.d.viii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

3.5 Post-Construction Site Runoff for New Development and Redevelopment
104. Provide a brief summary of the overall progress towards implementation of this control measure. <i>Schedule A.3.e</i> PC-1 Implement and Enforce a Post-Construction Stormwater Management Program <ul style="list-style-type: none"> • The City continued to implement the Post-Construction Stormwater Management Program during the report year. • Staff are in the process of developing the Stormwater Design Manual. <i>The Post-Construction Program includes activities that comply with the TMDL Implementation Plan and the WPCF permit.</i> PC-2 Maintain Legal Authority to Control Post-Construction Runoff <ul style="list-style-type: none"> • The City required and enforced the use of stormwater controls on all qualifying sites through design standards. • PW Staff began updating the stormwater design standards (SDS) and evaluating methods to fully enforce the requirements of Schedule A.3.e.

PC-3 Prioritize Low Impact Development

- Environmental staff continued to review ordinances, codes, and development standards.
- An interdisciplinary Review Team will be assembled to identify barriers to LID and create an action plan for eliminating or minimizing them.

PC-4 Update Stormwater Design Standards

- Environmental staff is working with the City Engineer to develop new Stormwater Design Standards; the new standards will be implemented on or before the permit deadline.

PC-5 Review Plans for Compliance with Stormwater Design Standards

- The City Engineer and Project Manager reviewed plans for compliance with the post-construction design standards.

PC-6 Implement a Long-Term PCSM Operations & Maintenance Program

- The City enforced long-term operation & maintenance requirements for stormwater controls through Private Maintenance Agreements.
- The Private Water Quality Facility Inventory and Inspection Program was implemented with inspections only performed on public stormwater facilities.

PC-7 Provide PCSM Training to Program Staff

- Program staff attended training on inspecting water quality facilities during the report year.

105. Were the required components in place by the implementation date? *Schedule A.3.e.i*

Yes No (*Implementation date: Feb. 28, 2023 for Existing Registrants and Sept. 1, 2023 for New Registrants*)

The implementation deadline for existing registrants is Feb. 28, 2023.

106. For projects creating or replacing impervious area, indicate the area (or threshold) where the site is required to implement the post-construction site runoff program requirements: *Schedule A.3.e.ii*

In square feet: 5,000 ft²

If necessary, provide an explanation:

107. Indicate which of the following are required at qualifying sites: *Schedule A.3.e.ii*

- The use of stormwater controls
- A site-specific stormwater management approach that targets natural surface or predevelopment hydrological function through the installation and long-term operation and maintenance of stormwater controls
- Long-term O&M of stormwater controls at project sites that are under the ownership of a private entity

If necessary, provide an explanation:

108. Were ordinance(s), code(s) and development standards reviewed to identify, minimize or eliminate barriers that inhibit design and implementation techniques intended to minimize impervious surfaces and reduce stormwater runoff? *Schedule A.3.e.iii*

Yes No

109. If barriers were identified or if necessary, provide an explanation:

Environmental staff will review ordinances, code and development standards for barriers on or before Sept. 1, 2023.

110. Provide an explanation of the timeline for removal of barriers or if removal is outside your authority:

NA - The City will assemble an interdisciplinary Review Team to address barriers to LID; the resulting action plan will be implemented on or before Sept. 1, 2023.

111. Indicate which of the following technical standards are used to determine the retention requirement: *Schedule A.3.e.iv.A*

- Volume-based method
- Storm event percentile-based method
- Annual average runoff-based method

If necessary, provide an explanation:

<p>112. For projects that are unable to meet the retention requirement, is the remainder of the rainfall/runoff treated prior to discharge with a structural stormwater control? <i>Schedule A.3.e.iv.B</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>113. Was the stormwater structural control designed to remove, at minimum, 80 percent of the total suspended solids? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: Please refer to the City of Keizer Design Standards</p>
<p>114. Are the allowable structural stormwater controls and specifications available for review? <i>Schedule A.3.e.iv.C</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>115. Indicate if they are attached or the location where they can be viewed: Attached <input type="checkbox"/> Location: Design Standards If necessary, provide an explanation: Specifications are provided/referenced in the design standards.</p>
<p>116. Have alternatives for projects complying with the retention requirement been approved? <i>Schedule A.3.e.iv.D</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>117. If yes, are the written technical justifications evaluated? <i>Schedule A.3.e.iv.D</i> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>118. Provide a brief description of the factors of technical infeasibility or site constraints that prevented the on-site management of the runoff amount stipulated in the stormwater retention requirement or a portion thereof. <i>Schedule A.3.e.iv.D</i> If necessary, provide an explanation: NA – program development is in progress; program will be developed and implemented on or before Feb. 28, 2023.</p>
<p>119. Before the allowance of alternative compliance, were mitigation options established? <i>Schedule A.3.e.iv.E</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If necessary, provide an explanation: NA- program development is in progress</p>
<p>120. If applicable, indicate which of the following mitigation options have been used and provide a narrative description of the implementation of the mitigation option? <i>Schedule A.3.e.iv.E</i> <input type="checkbox"/> Off-Site Mitigation NA <input type="checkbox"/> Groundwater Replenishment Projects NA <input type="checkbox"/> Treatment Equivalent to the Retention Requirement NA If necessary, provide an explanation: NA – to be developed and implemented on or before Feb. 28, 2023.</p>
<p>121. Was a procedure developed for the review and approval of structural stormwater control plans for new development and redevelopment projects? <i>Schedule A.3.e.v</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: The program is implemented at the discretion of the Public Works Director and the City Engineer. Stormwater controls/drainage plans are reviewed and approved by the Project Manager and the City Engineer.</p>
<p>122. Indicate the minimum land disturbance or creation of new impervious area where plans are required to be reviewed: 5,000 ft² <input checked="" type="checkbox"/>, acres <input type="checkbox"/> of land disturbance <input type="checkbox"/> creation of new impervious area <input checked="" type="checkbox"/></p>

The City currently reviews public or private developments, general improvements, or any work in the City of Keizer which in any way impacts, alters, destroys, changes, or modifies existing drainage conditions or facilities.

123. Are all sites that use alternative compliance to meet the retention requirement reviewed?

Yes No

If necessary, provide an explanation:

Stormwater drainage plans are reviewed and approved by the Project Manager and the City Engineer.

124. Indicate if an inventory and implementation strategy is used to ensure that all stormwater controls are operated and maintained to meet the site performance standard in Schedule A.3.e.iv of the permit? *Schedule A.3.e.vi*

Yes No

If necessary, provide an explanation:

A Private Water Quality Facility Inventory and Inspection Program was developed in 2015 to create an inventory of existing facilities and ascertain their condition and functionality. Inventories were updated during the report year, however inspections of private facilities were not performed due to staffing shortages.

125. Indicate which of the following strategies have been developed to ensure that all stormwater controls are operated and maintained to meet the site performance standard in Schedule A.3.e.iv.: *Schedule A.3.e.vi*

- Legal authority to inspect and require effective operation and maintenance of privately owned and operated stormwater controls
- Inspection procedures and an inspection schedule to ensure compliance with the O&M requirements of each stormwater control operated by the permit registrant and by other private entities
- A tracking mechanism for documenting inspections and the O&M requirements for each stormwater control
- Reporting requirements for privately owned and operated stormwater controls that document compliance with the O&M requirement in Schedule A.3.f.

If necessary, provide an explanation: Achieved through Private Maintenance Agreements (formal contracts that are recorded with Marion County Assessor's Office)

126. Are the location of all public and private stormwater controls installed during this permit term are documented on the MS4 Map? *Schedule A.3.e.vi*

Yes No

If necessary, provide an explanation:

127. Were all persons responsible for performing post-construction runoff site plan reviews, administering the alternative compliance program, or performing O&M practices or evaluating compliance with long-term O&M requirements appropriately trained to conduct such activities? *Schedule A.3.e.vii*

Yes No

If necessary, provide an explanation:

Program staff from the Environmental and Stormwater Operations Divisions attended training on water quality facility inspections. The City Engineer and Project Manager receive training through continuing education and professional development hours.

128. Were all new staff working to implement the post-construction site runoff for new development and redevelopment program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.e.vii*

Yes No

3.6 Pollution Prevention and Good Housekeeping for Municipal Operations

129. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.f*

MPP-1 Implement a Municipal Pollution Prevention (MPP) Program

- The Municipal Pollution Prevention Program was implemented during the report year.
- The Good Housekeeping Manual was updated to address pesticides and fertilizers, litter controls, and waste disposal best practices.

<ul style="list-style-type: none"> • The O&M Manual was reviewed and implemented; no updates were necessary to meet the requirements. <p>MPP-2 Inspect and Clean Catch Basins</p> <ul style="list-style-type: none"> • The Inlet Inspection and Cleaning Program was implemented successfully. <p>MPP-3 Implement Integrated Pest/Vegetation Management Plans</p> <ul style="list-style-type: none"> • The Good Housekeeping Manual was updated to include best practices for pesticide and fertilizer application and storage. <p>MPP-4 Control Litter</p> <ul style="list-style-type: none"> • The Litter Control Program was implemented successfully. • Street Sweeping was performed continuously throughout the reporting year. • The Parks & Facilities Division continued to control litter at parks and City-owned facilities. • Staff updated the Adopt-A-Street program for roadside litter clean ups • Staff implemented several litter clean up stewardship events <p>MPP-5 Develop and Implement a Materials Management Plan</p> <ul style="list-style-type: none"> • A Municipal Waste Management Plan was created to document the best practices for disposing of wastes generated by street sweeping, storm line cleaning, catch basin cleaning, etc. The plan is included in the Good Housekeeping Manual. <p>MPP-6 Provide MPP Training to Program Staff</p> <ul style="list-style-type: none"> • Public Works staff were trained on the updated Good Housekeeping Manual.
<p>130. Were the required components in place by the implementation date? <i>Schedule A.3.f.i</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (Implementation date: Feb. 28, 2022 for Existing Registrants and Sept. 1, 2023 for New Registrants)</p>
<p>131. Were O&M strategies for existing controls developed for both permit registrant-owned controls and controls owned and operated by another entity discharging to the MS4? <i>Schedule A.3.f.ii</i></p> <p>132. Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p> <p>O&M strategies for public and private controls have been developed; O&M for private controls are required through Private Maintenance Agreements.</p>
<p>133. Indicate the percentage of catch basins inspected/cleaned: <i>Schedule A.3.f.iii</i></p> <p>Percentage inspected this reporting year: 82% of all public MS4 inlets were inspected.</p> <p>Percentage cleaned: 9%</p> <p>134. If known, estimate of material removed: 20 yards</p> <p>135. Percentage inspected during the permit term: 91%</p> <p>Percentage cleaned: 37%</p> <p>136. If known, estimate of material removed: 85 yards</p> <p>If necessary, provide an explanation:</p>
<p>137. Indicate if a catch basin inspection prioritization system and/or an alternate inspection frequency has been established. <i>Schedule A.3.f.iii</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p> <p>The Stormwater Division implements the Inlet Inspection and Cleaning Program. All catch basins and or manholes equipped with stormwater controls (flow controls, sumps, etc.) are inspected annually and cleaned if sediment accumulation is greater than six-inches in depth.</p>
<p>138. During the permit term were existing procedures for inspection and maintenance schedules reviewed/updated to ensure pollution prevention and good housekeeping practices were conducted for the following activities? <i>Schedule A.3.f.iv</i></p> <p><input checked="" type="checkbox"/> Pipe cleaning for stormwater and wastewater conveyance systems</p> <p><input checked="" type="checkbox"/> Cleaning of culverts conveying stormwater in roadside ditches</p> <p><input checked="" type="checkbox"/> Ditch maintenance</p> <p><input checked="" type="checkbox"/> Road and bridge maintenance</p> <p><input checked="" type="checkbox"/> Road repair and resurfacing including pavement grinding</p>

<p> <input checked="" type="checkbox"/> Dust control for roads and municipal construction sites <input checked="" type="checkbox"/> Winter road maintenance, including salt or de-icing storage areas <input checked="" type="checkbox"/> Fleet maintenance and vehicle washing <input checked="" type="checkbox"/> Building and sidewalk maintenance including washing <input checked="" type="checkbox"/> Solid waste transfer and disposal areas <input checked="" type="checkbox"/> Municipal landscape maintenance <input checked="" type="checkbox"/> Material storage and transfer areas, including fertilizer and pesticide, hazardous materials, used oil storage, and fuel <input type="checkbox"/> Firefighting training activities <input checked="" type="checkbox"/> Maintenance of municipal facilities including public parks and open space, golf courses, airports, parking lots, swimming pools, marinas, etc. If necessary, provide an explanation: The Good Housekeeping Manual was reviewed and the activities with deficiencies were updated. The Manual has been updated and Public Works Staff have been made aware of the changes. </p>
<p>139. Do any permit registrant-owned facilities have coverage under DEQ's 1200-Z Industrial Stormwater Discharge Permit? <i>Schedule A.3.f.v</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> If "Yes", provide DEQ File Number(s): NA If necessary, provide an explanation: NA</p>
<p>140. Are practices in place to reduce the discharge of pollutants to the MS4 associated with the application and storage of pesticides and fertilizers? <i>Schedule A.3.f.vi</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: The City uses licensed applicators for pesticide and fertilizer applications in public rights-of-way, parks, facilities, vegetative swales and landscaped areas. Public Works has two licensed applicators in the Parks and Facilities Division who follow all label requirements when applying pesticides and fertilizers. The Good Housekeeping Manual outlines BMPs for application and storage of pesticides/fertilizers.</p>
<p>141. Are methods/practices in place to reduce the discharge of litter within the jurisdiction? <i>Schedule A.3.f.vii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation:</p>
<p>142. Are practices in place to ensure that collected material or pollutants removed in the course of maintenance are managed and disposed of in a manner such as to prevent such pollutants from entering the waters of the state in accordance with state and federal rules? <i>Schedule A.3.f.viii</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation:</p>
<p>143. Were all persons responsible for evaluating O&M practices, evaluating compliance with long-term O&M requirements or ensuring pollution prevention at facilities and during operations appropriately trained to conduct such activities? <i>Schedule A.3.f.ix</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: Environmental Program staff provide training for Public Works staff specific to Good Housekeeping and O&M practices annually. Staff were provided training on the updated Good Housekeeping Manual.</p>
<p>144. Were all new staff working to implement the pollution prevention and good housekeeping for municipal operations program appropriately trained within 30 days of their assignment to this program? <i>Schedule A.3.f.ix</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation:</p>

4.0 Monitoring

If the requirement does not apply, mark "NA" and explain why it does not apply to you in the comments field.

145. Was municipal stormwater monitoring performed at outfall locations, in the receiving waterbody, or to demonstrate compliance with this permit? *Schedule B.3*

Yes No

146. If "Yes" is the data included in the Annual Report?

Yes No

If necessary, provide an explanation:

NA

4.1 Wood Village Monitoring Requirements

147. Provide a summary of the following to evaluate the control strategies established for the Lower Columbia Slough Phosphate, Lead, and Bacteria TMDLs: *Schedule D.1.b*

Phosphate:

NA

Lead:

NA

Bacteria:

NA

148. Indicate which of the following were completed:

For phosphate, monitor influent and effluent dissolved orthophosphate concentrations and total phosphate concentrations at a representative site in Fairview Lake (Reach 4) and Fairview Creek (Reach 5)

For lead, estimates of the effectiveness of controls to remove TSS

For bacteria, measuring E. coli concentrations and its distribution over flows (for example, flow duration intervals) to demonstrate compliance with E. coli criteria

If necessary, provide an explanation:

NA

5.0 Water Quality Standards

149. During this monitoring year was it determined or reported that the MS4 discharge caused or contributed to an excursion of an applicable water quality standard? *Schedule A.1.b*

Yes No

If necessary, provide an explanation:

NA

150. How and when did the excursion of an applicable water quality standard occur? *Schedule A.1.b*

If necessary, provide an explanation:

NA

151. Was the excursion self-reported or did DEQ send written notification? *Schedule A.1.b*

Self-reported: Yes No

If necessary, provide an explanation:

NA

152. Within 48 hours was an investigation started into the cause of the water quality excursion? *Schedule A.1.b.i*

Yes No

If necessary, provide an explanation:

NA

153. Within 30 days of becoming aware of the excursion, was DEQ notified in writing, if self-reporting? *Schedule A.1.b.ii*

Yes No

If necessary, provide an explanation:

NA

154. Within 60 days of becoming aware of or being notified of the excursion, was a report submitted to DEQ that documents the following: *Schedule A.1.b.iii*

The results of the investigation, including the date the excursion was discovered

A brief description of the conditions that triggered the violation or the cause

Corrective actions taken or planned, including the date corrective action was completed or is expected to be completed

If necessary, provide an explanation:

NA

155. Were the corrective actions implemented in accordance with the schedule approved by DEQ? *Schedule A.1.b*

Yes No

If necessary, provide an explanation:

NA

156. Provide any additional comments or narrative description, if necessary:

NA