



Annual Report

MS4 Phase II General Permit

National Pollutant Discharge Elimination System

MS4 Stormwater Discharge Permit

**2019-2020
Monitoring Year**

**City of Keizer
October 26, 2020**

#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: _____

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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 |
|---------------------|------------------|-------------------|

13. Point of Contact: **Keare Blaylock**

| | | |
|--|------------------------------------|----------------------------|
| Title: Environmental-Technical Division Manager | Email: blaylockk@keizer.org | Phone: 503-856-3526 |
|--|------------------------------------|----------------------------|

14. Mailing Address (*if different*):

| | | |
|-------|--------|------|
| City: | State: | Zip: |
|-------|--------|------|

2.2 Municipal Separate Storm Sewer System (MS4) Information

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

16. Estimate the population served by the MS4: **38,505**

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 | 17 | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | Bacteria, Mercury, Temperature |
| b. Claggett Creek | 44 | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Bacteria, Mercury, Temperature |
| c. Labish Ditch | 25 | 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 (#2009-585)** – *provides legal authority to prohibit non-stormwater discharges/connections to the storm drain system.*
 - *Status: this ordinance has been evaluated for compliance with the new permit and will be updated as necessary on or before Feb. 28, 2022.*
- **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: this ordinance will be evaluated for compliance with the new permit and updated 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: this ordinance will be evaluated for compliance with the new permit and updated as necessary 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 will be evaluated for compliance with the post-construction minimum control measure requirements and 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 is designed to establish routine maintenance requirements in order to ensure long-term function of stormwater treatment facilities.*

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:

SWMP Document will be submitted with the 2nd Annual Report, as required.

21. Identify the publicly accessible website where the SWMP Document is posted. *Schedule 2.c & A.3.b.ii*

NA

If necessary, provide an explanation:

Due to staff turnover, the SWMP Document was not completed during the 2019-20 permit year. Exhibit 1-A shows the Public Education/Outreach section and Exhibit 2-A shows the Public Involvement/Participation section of the SWMP Document that were developed and implemented during the reporting period. The draft SWMP Document will be posted to the City’s website during the 2020-21 report year.

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*

| |
|--|
| <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p> <p>The completed sections of the SWMP Document include implementation schedules (first two control measures); the completed draft will include implementation timelines for all control measures.</p> |
| <p>23. Describe the method used to gather, track, and use SWMP information to set priorities or assess compliance: <i>Schedule A.2.d</i></p> <p>The City developed best management practices with clearly stated goals and measurable objectives to inform future strategies, set priorities and assess progress. 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.</p> |
| <p>24. Have adequate finances, staff, equipment and other support capabilities been provided to implement the permit? <i>Schedule A.2.e</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p> <p>The Stormwater Utility Fee Ordinance (#2014-563) secures funding for implementation of stormwater management plans, programs, operations and maintenance. The dedicated Stormwater Fund budget was approximately \$2 million for the reporting period.</p> |
| <p>25. During this monitoring year was compliance with the requirements of this permit evaluated? <i>Schedule B.1</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p> |
| <p>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? <i>Schedule A.1.a</i></p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If "Yes", complete section 3.7, Water Quality Standards of this template.</p> |

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*

The new requirements were met through the development and implementation of a comprehensive [Public Education Plan](#), or PEP. The PEP outlines the specific activities planned for each year of the permit term and defines the target message(s), target audience(s), distribution method(s), and performance measure(s) for each activity. The plan will be reviewed annually to identify strengths and/or deficiencies and updated as necessary to effectively address stormwater issues of significance in Keizer.

- The City continued to implement its existing Public Education and Outreach Program while working to develop and implement BMPs to meet the requirements of Schedule A.3.a.
- The Public Education/Outreach section of the SWMP Document was developed and implemented during the reporting period; see Exhibit 1-A.
- The PEP was developed and implemented before Feb. 28, 2020.
- The planned activities for Year 1 were implemented during the reporting period.
- The PEP was reviewed to assess progress.
- At least one educational activity was evaluated during the reporting period.

In addition to the requirements in Schedule A.3.a of the General Permit, the PEP includes educational activities that staff will conduct to comply with the TMDL Implementation Plan and WPCF Class V Stormwater Permit.

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: **10**

30. During the permit term: **10**

If necessary, provide an explanation:

This exceeds the stated requirement.

See the PEP for descriptions of the Year 1 activities.

See Exhibit 1-B for examples and implementation results.

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*

- Impacts of illicit discharges on receiving waters and how to report them
- Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts
- BMPs for proper use, application and storage of pesticides and fertilizer
- BMPs for litter and trash control
- BMPs for recycling programs
- BMPs for power washing, carpet cleaning and auto repair and maintenance
- Low impact development/green infrastructure
- Information pertaining to maintenance of septic systems
- Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife
- Other: **TMDL criteria – temperature; WPCF criteria – spill response, UIC maintenance, infiltration and groundwater 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>Please refer to the Public Education Plan for complete descriptions See Exhibit 1-B for examples and implementation results.</p> |
| <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: 1 event</p> <p>Keizer hosted the 9th-annual Mid-Willamette Erosion Control and Stormwater Management Summit in partnership with the Mid-Willamette Outreach Group. The event was attended by 150 construction and stormwater professionals.</p> <p>Erosion prevention and sediment control guidance is available on the City's website and program staff provided technical support and education to Erosion Control permittees throughout the permit, plan review, and inspection process.</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>Activity 4 was assessed; details of the assessment are presented in Exhibit 1-C.</p> <p>Based on the performance measures and platform metrics, this activity had the highest ranking for audience reach and engagement. It was also the most efficient use of resources.</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>Given the strengths of this activity, staff will continue to pair social media posts with our website content to distribute messages and engage the public. In order to bolster engagement Keizer will offer additional campaigns that incentivize action and design future campaigns to promote and document behavior change.</p> |

| 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></p> <p>The new requirements were met through public meetings, utilization of the City’s website and offering stewardship opportunities.</p> <ul style="list-style-type: none"> → The City continued to implement its existing Public Involvement and Participation Program while working to develop and implement BMPs to meet the requirements of Schedule A.3.b. → The Public Involvement/Participation section of the SWMP Document was developed and implemented during the reporting period; see Exhibit 2-A. → The Stormwater Advisory Committee (SWAC) meetings provided a venue for committee members and the public to comment on the development of the Stormwater Management Program. → The Environmental Division webpages were updated to meet the new requirements prior to Feb. 28, 2020, including the addition of an online reporting tool for illicit discharges. → The City offered two stewardship opportunities designed to garner public participation in protecting natural resources: Storm Drain Marking and Invasive Weed Removal. → City staff completed water quality enhancement projects in partnership with the Claggett Creek Watershed Council and volunteers. <p style="text-align: center;">In addition to the requirements in Schedule A.3.b of the General Permit, the Public Involvement Program includes strategies to comply with the TMDL Implementation Plan and WPCF Class V Stormwater Permit.</p> |
| <p>41. Were the required components in place by the implementation date? <i>Schedule A.3.b.i</i></p> <p>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></p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>The SWMP Document was not completed during the report year; the 2004 Stormwater Management Plan is available on the City’s website.</p> |
| <p>43. Was the publicly accessible website updated during this reporting year? <i>Schedule A.3.b.ii</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p> <p>Updates/additions included: staff contact information, Online ID Report Tool and content, Resource Library with content, Event pages, Environmental News page w/content, interactive map applications, 2018-19 annual reports, and SWAC meeting agendas 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></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p> <p>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></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p> <p>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></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p> <p>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></p> |

Yes No

If necessary, provide an explanation:

[Environmental Division Home Page - Point of Contact](#)

48. During this reporting year, was a stewardship opportunity created or partnered with another entity? *Schedule A.3.b.iii*

Yes No

If "Yes", summarize the stewardship opportunity(s).

City staff completed water quality enhancement projects in partnership with the Claggett Creek Watershed Council and volunteers.

Note: the City of Keizer continued to offer its existing stewardship programs during the reporting period. Participation in these programs has steadily decreased over time, therefore staff will consider new outreach methods to increase participation and/or explore new opportunities with more meaningful involvement.

Staff will continue to offer the existing stewardship opportunities during permit years 1 and 2. In year 2, staff will explore new opportunities and implement a revised stewardship program in years 3 through 5.

[Stewardship Programs - Volunteer Opportunities](#)

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*

The new requirements will be met through the implementation of a comprehensive IDDE Plan. The existing IDDE Plan describes the City's strategy for prohibiting illicit discharges, mechanisms for enforcement, complaint intake and response, spill response, detection and elimination of transient and chronic illicit discharges, agency referrals protocols, dry-weather screening procedures, and staff training.

- The City continued to implement its existing IDDE Program while working to develop and implement BMPs to meet the requirements of Schedule A.3.b.
- The IDDE Plan has been evaluated for compliance and will be updated to meet the new requirements of the General Permit on or before February 28, 2022.
- The City maintained a map and digital inventory of the MS4. Staff are in the process of updating the geodatabase to meet the new requirements of the General Permit (tracking criteria). Data collection and verification are on-going.
- The City prohibited illicit discharges through the Stormwater Discharge Control Ordinance (2009-585); the ordinance will be evaluated in 2020-21 and revised to comply with the new requirements or before Feb. 28, 2022.
- Staff followed the existing IDDE Enforcement Response Plan to apply corrective actions and enforcement; this plan has been evaluated and will be revised to comply with the new requirements on or before Feb. 28, 2022.
- Public Works conducted dry-weather inspections of public outfalls. The existing inspection program meets the requirements of the General Permit. Staff will perform a priority outfall analysis to inform future inspection protocols. Field screening activities will be updated to include Pollutant Parameter Action Levels and Laboratory Analysis on or before Feb. 28, 2022.
- Environmental program staff provided IDDE training to all Public Works employees; training programs will be revised to address new training requirements on or before Feb. 28, 2022.
- Environmental program staff developed and implemented a new method for documenting illicit discharge complaint intake and response. Staff responsible for responding to complaints have been trained to use a mobile GIS application (Survey123®) to accurately track the City's response per General Permit requirements.

In addition to the requirements in Schedule A.3.c of the General Permit, the IDDE Plan will include detection and elimination strategies that staff will take to comply with the TMDL Implementation Plan and WPCF Class V Stormwater Permit.

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)

The City continued to implement its existing IDDE Program.

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 personal/file 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:

Public Works has put considerable effort into developing a robust stormwater asset registry. The Environmental & Technical Division experienced unprecedented turnover over the last 2 years that inhibited field collection and registry updates. Public Works added a new GIS Technician position to the division in September of 2019 however there are some known gaps and discrepancies that need to be resolved. This work is planned for the 2020-21 report year, with routine updates to resume thereafter. A current MS4 Map will be submitted with the third annual report, as required.

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

| |
|--|
| <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation: No new outfalls have been installed since 2018, thus this dataset is current.</p> |
| <p>55. Indicate if the following features are included on your MS4 map:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Location of all known outfalls, including the requirements in <i>Schedule A.3.c.ii.B</i> <input checked="" type="checkbox"/> Stormwater collection and conveyance system, including the requirements in <i>Schedule A.3.c.ii.C</i> <input checked="" type="checkbox"/> Stormwater structural controls, including the requirements in <i>Schedule A.3.c.ii.C</i> <input checked="" type="checkbox"/> Location of known chronic discharges <i>Schedule A.3.c.ii.D</i> <p>If necessary, provide an explanation: As previously noted, with the exception of assets that may have been added, removed, or modified after 2018, the location of all public assets have been GPS-collected and added to the digital inventory.</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></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation: The Stormwater Discharge Control Ordinance (2009-585) prohibits non-stormwater discharges to the MS4 and provides authorization for enforcement. Staff evaluated the ordinance against the new requirements and found only minor deficiencies. The City is in the process of revising the ordinance to meet new requirements. The updated ordinance will be implemented on or before Feb. 28, 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:</p> |
| <p>58. Is the written escalating enforcement and response procedure included as an attachment? <i>Schedule A.3.c.iv</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: Please refer to Exhibit 3-A: IDDE 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 If necessary, provide an explanation: Online ID Report Tool |
| 60. Provide the number of complaints received during this reporting year. <i>Schedule A.3.c.v.D</i> Number: 3 complaints (19 field detects) |
| 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 Staff responded to all three complaints on the same day it was received. Typical response occurs within 1 day. Follow-up actions are typically taken within 1-3 days of the initial investigation. |
| 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 notification: 0 |
| 63. Provide the number of complaints where staff performed an investigation during this reporting year. <i>Schedule A.3.c.v</i> Number: Staff responded to all three complaints in-person, none of which required an investigation. |
| 64. On average, how long did it take to conduct an initial investigation? <i>Schedule A.3.c.v.B</i> In working days: NA |
| 65. Provide the number of illicit discharges discovered and eliminated during this reporting year. <i>Schedule A.3.c.v</i> Number: 20; two of three complaints were found to be invalid; all 19 field detections were resolved or eliminated |
| 66. On average, how long did it take to eliminate an illicit discharge? <i>Schedule A.3.c.v.B</i> In working days: 2 days |
| 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: 20 Staff followed the IDDE Enforcement Response Plan for each complaint/detection; none required escalating enforcement (detections were resolved through education and/or verbal warning). |
| 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: Stormwater Operations investigated a potential cross-connection following a sewer overflow that resulted from a blockage. Area storm pipes were inspected (TV) and sewer lines were smoke tested. No cross-connections were detected. <i>Note: Keizer's sanitary sewer system is operated and maintained by the City of Salem through an intergovernmental agreement; sanitary sewer overflows are reported by Salem per NPDES permit requirements.</i> |
| 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: 1 |
| 69. On average, how long did it take to notify the entity(s)? In working days: 1 day If necessary, provide an explanation: A potential illicit discharge was investigated and reported to Salem. |
| 70. Indicate which of the following are included in the complaints or reports tracking documentation: <i>Schedule A.3.c.v.D</i> <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. Office staff and field workers can view, enter, and update incidents in real-time. When a new entry is made, 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: 99%</p> <p>72. Known outfalls screened during the permit term: 99% If necessary, provide an explanation: Stormwater Operations inspected 160 outfalls during the report year. Roughly 1% of public outfalls were inaccessible at the time of inspection; alternate inspection locations will be identified in 2020-21.</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: NA</p> <p>74. Priority location outfalls screened during the permit term: NA If necessary, provide an explanation: Through previous compliance efforts, Stormwater Operations completed inspections for all public outfalls. Staff will perform a priority outfall analysis in the 2020-21 report year. The analysis will include both public and private outfalls. The results will be used to inform future inspection protocols. Annual inspections will include the priority outfalls.</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 checked="" type="checkbox"/> Field Screening and Analysis <input type="checkbox"/> Pollutant Parameter Action <input type="checkbox"/> Laboratory Analysis</p> <p>If necessary, provide an explanation: Pollutant Parameter Action levels and Lab Analysis protocols will be developed and implemented on or before Feb. 28, 2022.</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>Per the existing IDDE Plan: temporary measures may be deployed as necessary to contain or capture the discharge (sand bags, valves, berms, absorbents); spill response assistance may be requested if appropriate; source tracing/field reconnaissance will occur, business inspections may be performed, storm line (tv) inspections and/or indicator sampling may be implemented.</p> <p>Program staff also use a High Risk Tool Set based on land use, historical IDDE records, material storage sites, traffic density, and proximity to waterways that aids in illicit discharge investigations. The GIS-based tool allows staff to quickly pin point problem areas and identify likely sources of pollution.</p> |
| <p>77. Have pollutant parameter action levels been established and are they included as an attachment? <i>Schedule A.3.vi.F</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <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 and Lab Analysis protocols will be developed and implemented on or before Feb. 28, 2022.</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> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation: Environmental program staff implement the majority of the IDDE program and they are provided training as part of the onboarding process. All Public Works staff expected to respond to and/or report illicit discharges, receive annual training.</p> |

79. Are all new staff working to implement the IDDE program trained within 30 days of their assignment to this program? *Schedule A.3.c.vii*
 Yes No
 If necessary, provide an explanation:
Public Works staff are trained prior to being assigned to the program. Environmental program staff will develop and implement a new training module on IDDE detection and elimination before Feb. 28, 2022.

3.4 Construction Site Runoff Control

80. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.d*
The City’s existing EC Program meets the requirements of the General Permit.

- **The City continued to implement the existing Erosion Control Program while working to develop and implement the requirements of Schedule A.3.d.**
- **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).**
- **The City is a 1200-CN agent; projects disturbing five or more acres were referred to DEQ and/or the appropriate permitting agency.**
- **The City referenced Clean Water Services’ written specifications to demonstrate the proper installation and maintenance of controls.**
 - *Staff are in the process of developing Keizer-specific standards and specifications, which will be implemented on or before Feb. 28, 2023.*
- **The City required and reviewed ESCPs for all permitted construction sites.**
- **All permitted construction sites were inspected by CESCL certified staff on a routine basis.**
- **Program staff followed the existing EC Enforcement Response Plan to apply corrective actions and enforcement;**
 - *The plan has been evaluated for compliance and will be revised as needed to comply with the new requirements on or before Feb. 28, 2023.*
- **Program staff were required to have or obtain CESCL certification prior to their assignment to the program. Environmental program staff must obtain certification within 90 days of hire. Environmental program staff provide EC training to all Public Works employees annually; training programs will be revised to address the new training requirements on or before Feb. 28, 2023.**
- **Program staff used a checklist to review plans and implemented a mobile GIS application (Survey123®) for tracking and documenting inspections, violations, corrective actions and enforcements.**

In addition to the requirements in Schedule A.3.d of the General Permit, the Erosion Control Program includes strategies to comply with the TMDL Implementation Plan and WPCF Class V Stormwater Permit.

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 City continued to implement the existing Erosion Control Program

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.

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| <p>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 how these project are referred to DEQ or the appropriate DEQ agent, to obtain a NPDES Construction Stormwater General Permit. <i>Schedule A.3.d.iii</i> The City of Keizer is a 1200-CN Jurisdiction that manages erosion and sediment control permits for projects that disturb more than one but less than 5 acres and meet the conditions of 1200-C Schedule A. Referral determinations are made when a permit application is received and reviewed. Projects that are not authorized under the 1200-CN are referred to DEQ and/or appropriate administering agent. Information about the 1200-CN Program can be found on the City’s website.</p> |
| <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 checked="" type="checkbox"/> No <input type="checkbox"/> If necessary, provide an explanation: The City currently relies on referenced standards and specifications (Clean Water Services). Keizer-specific standards and specifications will be developed and implemented on or before Feb. 28, 2023. 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: Please refer to Exhibit 4-A (BMP checklists - page 2 of the CSPPP application; page 1 of the CSPPP-B application)</p> |
| <p>87. Indicate which of the following are required for qualifying construction projects: <i>Schedule A.3.d.iv</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Site operator required to complete a 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 <p>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"/> See Exhibit 4-B</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 expected 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: 13+ Indicate the number of inspections completed to comply with this requirement during the permit term: 13+ If necessary, provide an explanation: Thirteen projects resulted in a total disturbance greater than 1-acre; through routine inspections all permitted sites were inspected at least once during the report year (often weekly).</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: 15 If necessary, provide an explanation:</p> |
| <p>94. Indicate the total number of construction projects that were inspected this monitoring year: 39</p> |

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| <p>95. Indicate the total number of construction projects that were inspected during the permit term: 39</p> |
| <p>96. Indicate which of the following are documented during an inspection: <i>Schedule A.3.d.vi.B</i></p> <ul style="list-style-type: none"> <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 <p>If necessary, provide an explanation:</p> |
| <p>97. If available, provide a copy of the written or electronic inspection report form. <i>Schedule A.3.d.vi.B</i></p> <p>Attached: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>See Exhibit 4-C</p> |
| <p>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></p> <p>26 projects that disturbed < 1 acre were inspected. Yes, this is more than 25% of qualifying sites.</p> <p>If necessary, provide an explanation:</p> |
| <p>99. Provide the written escalating enforcement and response procedure as an attachment. <i>Schedule A.3.d.vii</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:</p> <p>See Exhibit 4-D - EC Enforcement Response Plan</p> |
| <p>100. Was the escalating enforcement procedure used to achieve compliance at any construction projects? <i>Schedule A.3.d.vii</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Indicate number of times during this reporting year: 22</p> |
| <p>101. Indicate number of times during the permit term: 22</p> <p>If necessary, provide an explanation:</p> |
| <p>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></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If necessary, provide an explanation:</p> <p>Program staff were required to have or obtain CESCL certification prior to their assignment to the program. Environmental program staff must obtain certification within 90 days of hire. Environmental program staff provide EC training to all Public Works employees annually; training programs will be revised to address new employee training requirements on or before Feb. 28, 2023.</p> |
| <p>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></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> |

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| 3.5 Post-Construction Site Runoff for New Development and Redevelopment |
| <p>104. Provide a brief summary of the overall progress towards implementation of this control measure. <i>Schedule A.3.e</i></p> <p>The City continued to implement the existing PCSM Program while working to develop, implement, and enforce the requirements of Schedule A.3.e. The new requirements of the PCSM Program will be met through the development and implementation of stormwater design standards and the creation of a comprehensive Stormwater Design Manual (SDM) on or before Feb. 28, 2023.</p> <p style="padding-left: 20px;">→ In anticipation of the General Permit, Environmental program staff made considerable progress in developing a manual. Environmental program staff will continue this effort in collaboration with the City Engineer, the Project Manager, and Stormwater Division staff, with oversight from the Public Works Director.</p> |

- The City required and enforced the use of stormwater controls on all qualifying sites through referenced [Design Standards](#) (Chapter 4 Storm Drainage, Section 4.02). Keizer will adopt and implement Keizer-specific stormwater design standards (SDS) and evaluate the need to adopt a new ordinance to fully enforce the requirements of Schedule A.3.e.
- Environmental program staff began a cursory review of ordinances, codes, and development standards prior to the issuance of the General Permit. The City will assemble an interdisciplinary Review Team to address barriers to LID; the resulting action plan will be implemented on or before Feb. 28, 2023.
- The development of new Stormwater Design Standards will begin in the 2020-21 report year and be implemented as required.
- The City Engineer and Project Manager reviewed plans for compliance with the existing post-construction design standards.
- The City enforced long-term operation & maintenance requirements for stormwater controls through Private Maintenance Agreements.
- Program staff will assess the Private Water Quality Facility Inventory and Inspection Program for compliance and implement in 2020-21.
- The City continued to provide routine training to program staff while developing new training materials.

In addition to the requirements in Schedule A.3.e of the General Permit, the Post-Construction Program will include strategies to comply with the TMDL Implementation Plan and WPCF Class V Stormwater Permit.

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 City continued to implement the existing PCSM Program.

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: ft²

If necessary, provide an explanation:

The threshold for post-construction site runoff is, “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”(Design Standards, Chapter 4, Section 4.01a). The program is implemented at the discretion of the Public Works Director and the City Engineer.

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:

A cursory review of ordinances, codes, and development standards was done prior to permit issuance. The City will assemble an interdisciplinary Review Team to address barriers to LID; the resulting action plan will be implemented on or before Feb. 28, 2023.

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

2019-20 – Cursorsory review; 2020-21 – Assemble an LID Review Team, set goals and assessment criteria; 2021-22 – Review ordinances, codes, and development standards and create an action plan to remove barriers; 2022-23 – Implement the action plan.

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

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| <p><input type="checkbox"/> Volume-based method <input checked="" type="checkbox"/> Storm event percentile-based method <input type="checkbox"/> Annual average runoff-based method If necessary, provide an explanation:</p> |
| <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: Refer to 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> NA If necessary, provide an explanation: NA – to 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 – to be developed and implemented on or before Feb. 28, 2023.</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:</p> |

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.

122. Indicate the minimum land disturbance or creation of new impervious area where plans are required to be reviewed:
ft² , acres of land disturbance creation of new impervious area

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. Program staff will assess the existing program for compliance and re-implement in 2021-22.

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: **Private Maintenance Agreements**

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

Yes No

If necessary, provide an explanation:

Asset collection was inhibited due to staff turnover; collection of these assets is planned for the 2020-21 report year.

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:

The City Engineer and Project Manager receive training through continuing education and professional development hours. Environmental program staff are trained prior to their assignment to the program. Environmental program staff provide PC training to all Public Works employees annually; training programs will be revised to address the new training requirements on or before Feb. 28, 2023.

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*

The City continued to implement two municipal pollution prevention programs aimed at reducing water quality impacts from City operations: Good Housekeeping Manual and the O&M Plan.

- **The City continued to implement the Good Housekeeping and O&M programs while developing new strategies to meet the criteria listed in Schedule 3.A.f.**
- **The City’s existing Inlet Inspection and Cleaning Program meets the new permit requirements; Stormwater Operations Division conducted inlet inspections and cleaning during the report year.**
- **City staff followed the vegetation management guidance in the Good Housekeeping Manual including proper storage, disposal, and application practices.**
 - *Environmental staff will work with Parks and Facilities to create Integrated Pest/Vegetation Management Plans (IPM and IVM) to provide a proactive approach to managing pests and vegetation in public spaces and rights-of-ways on or before Feb. 28, 2022.*
- **City staff implemented methods to reduce litter within the City limits in order to reduce the discharge of pollutants and litter to the MS4.**
- **The City managed and disposed of collected material removed in the course of maintenance, treatment, control of stormwater in a manner that prevented pollution from entering waters of the state.**
- **The City continued to provide routine training to program staff.**

In addition to the requirements in Schedule A.3.f of the General Permit, the Municipal Pollution Prevention Program will include strategies to comply with the TMDL Implementation Plan and WPCF Class V Stormwater Permit.

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

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

The City continued to implement the Municipal Pollution Prevention program.

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? *Schedule A.3.f.ii*

132. Yes No N/A

If necessary, provide an explanation:

O&M strategies for city-owned controls are in place; O&M strategies for privately-owned controls will be developed on or before Feb. 28, 2022.

133. Indicate the percentage of catch basins inspected/cleaned: *Schedule A.3.f.iii*

Percentage inspected this reporting year: **94** Percentage cleaned: **11**

134. If known, estimate of material removed: **Unknown**

135. Percentage inspected during the permit term: **94**; Percentage cleaned: **11**

136. If known, estimate of material removed: **Unknown**

If necessary, provide an explanation:

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.

137. Indicate if a catch basin inspection prioritization system and/or an alternate inspection frequency has been established. *Schedule A.3.f.iii*

Yes No

If necessary, provide an explanation:

NA - Environmental program staff will evaluate the Inlet Inspection and Cleaning Program and work with Stormwater Operations staff to implement a priority inspection procedure as appropriate to comply with the new requirements on or before Feb. 28, 2022.

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? *Schedule A.3.f.iv*

- Pipe cleaning for stormwater and wastewater conveyance systems
- Cleaning of culverts conveying stormwater in roadside ditches
- Ditch maintenance
- Road and bridge maintenance
- Road repair and resurfacing including pavement grinding
- Dust control for roads and municipal construction sites
- Winter road maintenance, including salt or de-icing storage areas
- Fleet maintenance and vehicle washing
- Building and sidewalk maintenance including washing
- Solid waste transfer and disposal areas
- Municipal landscape maintenance
- Material storage and transfer areas, including fertilizer and pesticide, hazardous materials, used oil storage, and fuel
- Fire fighting training activities
- 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 a plan was developed to address deficiencies. The Manual will be updated and implemented on or before Feb. 28, 2022.

139. Do any permit registrant-owned facilities have coverage under DEQ's 1200-Z Industrial Stormwater Discharge Permit? *Schedule A.3.f.v*

Yes No NA

If "Yes", provide DEQ File Number(s): **NA**

If necessary, provide an explanation:

NA

140. Are practices in place to reduce the discharge of pollutants to the MS4 associated with the application and storage of pesticides and fertilizers? *Schedule A.3.f.vi*

Yes No

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.

Environmental staff will coordinate with Parks and Facilities staff to develop IVM and IPM Plans on or before Feb. 28, 2022.

141. Are methods/practices in place to reduce the discharge of litter within the jurisdiction? *Schedule A.3.f.vii*

Yes No

If necessary, provide an explanation:

The City works cooperatively with other organizations to clean up trash after major public events like parades and festivals. For example, staff coordinates with local garbage haulers, street sweeping contractors and volunteers to clean up after major events.

Public Works also promotes and implements a year-round Adopt-A-Street program to control litter along roadways and performs annual cleanings of inlets to prevent litter from discharging to local waterways through the MS4. The Parks and Facilities Division is responsible managing waste and controlling litter in 19 city parks and all City owned facilities.

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? *Schedule A.3.f.viii*

Yes No

If necessary, provide an explanation:

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? *Schedule A.3.f.ix*

Yes No

If necessary, provide an explanation:

Environmental Program staff provide training for Public Works staff specific to Good Housekeeping and O&M practices. Trainings are typically paired with monthly safety meetings, though trainings vary in frequency. Keizer will continue to offer regular training to staff responsible for implementing O&M while developing a new training regimen to meet the requirements in Schedule A.3.f.ix.

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? *Schedule A.3.f.ix*

Yes No

If necessary, provide an explanation:

Environmental staff conducted a preliminary survey of Public Works staff in 2019 to gauge internal awareness of the impacts of stormwater pollution on local waterways. The information will be used to guide the development of training for crew members.

The existing training program will be revised to include specific training on the revised GH Field Manual and O&M Plan. Annual trainings will be provided for all Public Works staff, and a GH module for new Public Works employees to complete within 30 days of hire. The new training program will be implemented on or before February 28, 2022.

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