

ROGUE VALLEY SEWER SERVICES STORMWATER MANAGEMENT PROGRAM (SWMP)

1.0 INTRODUCTION

This Stormwater Management Program (SWMP) for Rogue Valley Sewer Services (RVS) has been developed to meet the Municipal Separate Storm Sewer System (MS4) permit requirements of the National Pollutant Discharge Elimination System (NPDES). The MS4 program for small jurisdictions is often called NPDES Phase II. RVS serves the Cities of Central Point, Phoenix and Talent, Oregon, as well as portions of unincorporated Jackson County. Appendix A includes a general map showing jurisdictional boundaries and the service area. The jurisdictions have prepared letters of intent to reach an intergovernmental agreement to participate in the RVS permit. These letters are included in Appendix B.

Although this SWMP has been developed specifically for RVS, many of the efforts outlined in this program have been coordinated regionally. A Stormwater Advisory Team (SWAT) was formed in 2003 to coordinate the Phase II program within the region. The SWAT is made up of representatives from Ashland, Central Point, Jackson County, Medford, Phoenix and Talent. The municipalities involved in the regional effort hired a consultant to develop individual programs and facilitate a regional approach. The *Rogue Valley Regional NPDES Phase II Stormwater Program Guide* (February 2004) was prepared as a regional guideline for the individual jurisdiction programs. The *Regional Guide* is being submitted along with this SWMP.

The *Regional Guide* describes six minimum stormwater control measures along with sample checklists, methods to measure activities, and other tools to assist the communities in meeting the Phase II requirements. The Rogue Valley Council of Governments (RVCOG) is working with the jurisdictions to facilitate public education and involvement requirements. This regional teaming arrangement is expected to continue throughout this program.

This SWMP is organized by the six minimum measures. At the beginning of each section is a summary table listing each proposed activity associated with the measure addressed in that section. The table indicates whether the activity is scheduled to be performed regionally (working together with other jurisdictions) and whether the activity is currently being performed. A “partial” status means some of the activity has been performed, but more is planned to meet requirements. Some activities will be handled at both the local and regional level and is indicated as a “both” under the regional activity column. The program outlined in this document was developed for a five-year period. The last five columns indicate which years (during the five-year permit period) that the activity is scheduled to be performed by the jurisdiction, working either jointly or independently, as applicable. The summary tables are followed by descriptions of schedules, measurable goals, responsible parties, and other implementation issues for each activity.

Measurable goals for each activity were established through various means. The goals generally represent what seems reasonable and attainable for each situation, based on past experience and common practices. Certain activities have precedent activities, so those are scheduled accordingly. From a practical sense, not all activities can be performed in Year 1,

so a conscientious attempt was made to spread them out over the five-year permit term. Each goal and its frequency/schedule will be evaluated during the annual reporting effort.

2.0 STORMWATER PUBLIC EDUCATION PROGRAM

The RVS intends to participate in a regional stormwater public education program with other members of the SWAT. The SWAT hired the Rogue Valley Council of Governments (RVCOG) to assist in the development of a five-year program for public education. This program is discussed in detail in the *Regional Guide* and is summarized in Table 2-1. The SWAT members plan to work together to implement a regional Public Education Program and will investigate a cost effective method for implementing the regional program. One likely method would be to contract with RVCOG to implement the program.

In addition to preparing the five-year program, RVCOG has implemented a program to educate the public about the regional coordination effort to prepare the five-year program and what the NPDES Phase II program means to the community. This work included conducting open houses, a television talk show, and presentations to City Councils. The following describes these efforts that have already taken place, along with the plan for the proposed five-year program.

TABLE 2-1. STORMWATER PUBLIC EDUCATION PROGRAM							
BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Stormwater Education and Outreach Strategy	Yes	Completed					
Stormwater Brochure for the General Public	Yes	Yes					
Targeted Stormwater Brochures	Yes	Partial					
Storm Drain Stenciling	No	Yes					
Water Quality Education with Schools	Yes	Partial					
Volunteer Groups on Stormwater Education	Yes	Partial					
Stormwater Speakers Bureau	Yes	Yes					
Stormwater Public Service Announcements	Optional	No					
Stormwater Display/Exhibit	Yes	Yes					
Stormwater Web Site	Yes	Partial					

	Activity scheduled for permit year
	No activity scheduled for permit year

2.1 Develop a Stormwater Education and Outreach Strategy [Regional Guide —Section 2.3.1]

The following five-year program is defined as the regional strategy for implementing stormwater education. The program was developed by RVCOG working closely with the members of the SWAT. The strategy will follow guidelines prepared in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*.

Schedule & Completion Date: The strategy has been developed as part of the *Regional Guide* and therefore this task is complete.

Measurable Goal: The SWAT intends to meet bimonthly or quarterly (every two or three months) to determine the effectiveness of the program. If it is determined that minor

modifications to the program are required to reach a larger audience, these will be outlined in the annual reporting.

Responsible Party: The implementation of this strategy will be a joint effort from the SWAT.

2.2 Stormwater Brochure for the General Public

[Regional Guide —Section 2.3.2]

RVCOG has already developed a stormwater brochure for the regional cities and will continue to develop these for the region. Distribution methods for future brochures will vary across the region; Jackson County and the Cities of Central Point and Talent will include the homeowner brochures in one normal utility bill mailing. The City of Phoenix has already prepared and distributed two brochures to the general public in 2003.

RVS will communicate stormwater issues to all customers via their newsletter. Stormwater issues will be included at least annually in the newsletter. RVS will be responsible for this activity although communities may continue to supply their citizens with informational brochures.

Schedule & Completion Date: The development and distribution of general stormwater brochures started in 2003. The effort will continue as part of the regional effort.

Measurable Goal: Stormwater issues discussed at least annually in the RVS newsletter.

Responsible Party: RVS Manager.

2.3 Targeted Stormwater Brochures

[Regional Guide —Section 2.3.3]

Within the first two years, RVCOG will develop a targeted brochure for erosion control (see Section 5.6). The brochure will discuss the need for erosion control along with general prevention and where more information can be obtained. The brochure will be included in all building permit application packages.

Other targeted brochures might include materials for homeowners along creek corridors or brochures describing new development requirements as part of this program.

Schedule & Completion Date: Develop erosion control brochure by Year 2. Develop second targeted brochure by Year 5. Targeted group to be determined by SWAT in Year 3.

Measurable Goal: Erosion Control targeted brochure included in all building permits by Year 3.

Responsible Party: RVS Manager will coordinate this effort with the RVCOG.

2.4 Storm Drain Stenciling

[Regional Guide —Section 2.3.4]

Jackson County and Central Point currently have no storm drain stenciling program although the Bear Creek Watershed Education Partners and the Boy Scouts have stenciled

a limited number of storm drains in Central Point and Jackson County. Jackson County and Central Point will develop programs to stencil the words “Dump No Waste—Drains to Streams” on storm drains. The goal will be to develop a storm stenciling program using both staff and volunteers for the entire Phase II area. This will be implemented on a regional level.

The City of Talent does not have a storm drain stenciling program for existing storm drains, but catchbasins in new developments are installed with the words “Dump No Waste—Drains to Streams” cast onto the grate. The City will develop a program to stencil existing city storm drains, with a goal of stenciling 20 percent of all storm drains each year. This will be implemented on a regional level.

The City of Phoenix has stenciled approximately 90 percent of its storm drains.

Schedule & Completion Date: In Jackson County and Central Point, staff will stencil 20 percent of the storm drains each year of the permit. In Talent and Phoenix, staff will investigate the wear of the stenciling in Years 3 and 5 to determine if the storm drains need repainting. For all four jurisdictions, all storm drains of new development and road improvement projects will be painted following project completion.

Measurable Goal: Measurable goal will be to stencil all storm drains by the end of permit Year 5, monitor stencils for wear, and include storm drain stenciling in final inspection for new development.

Responsible Party: RVS Manager will coordinate this effort with Jackson County and Cities of Central Point, Phoenix and Talent.

2.5 Promote Water Quality Education with School Districts

[Regional Guide —Section 2.3.5]

Through the SWAT, the RVS will coordinate and promote stormwater education. This effort will be led by RVCOG and include meeting with educators to determine how RVCOG staff can provide educational instruction and material to local educators. The coordination will include working with local organizations and school districts to develop a water quality education program. The City will follow guidelines prepared in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide* for future education projects.

Details of how the regional effort will assist educators will be determined based on the initial meetings with the educators.

Schedule & Completion Date: The regional effort will start approaching school districts and educators in Year 3 to determine the best methods to coordinate efforts.

Measurable Goal: Contact all school districts within the storm drain system boundary by the end of permit Year 3. Measurable goals for the detailed education will be based on the approach chosen to assist educators. The goals and achievements will be presented in the annual reporting.

Responsible Party: RVS - Manager.

2.6 Work with Volunteer Groups on Stormwater Education Projects

[Regional Guide —Section 2.3.6]

RVS will work with local volunteer organizations to discuss opportunities to integrate stormwater into existing education projects. The program will follow guidelines prepared in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*.

Schedule & Completion Date: The regional effort will assist any groups seeking opportunities to help educate the general public or specific groups concerning water quality. However, in Year 3 the regional effort through the RVCOG will proactively seek groups to assist in stormwater education.

Measurable Goal: Assist any groups actively contacting the SWAT. In Years 3 through 5, actively contact at least five volunteer organizations per year to discuss and promote stormwater education.

Responsible Party: RVS - Manager.

2.7 Develop a Stormwater Speakers Bureau

[Regional Guide —Section 2.3.7]

RVCOG has facilitated numerous stormwater presentations for the region. Five presentations have been given in the region to city councils, county commissioners, and other boards and commissions over the past year and more are scheduled in the spring of 2004. Three open houses are an effort being conducted to educate the public about the regional effort for developing Stormwater Management Plans to meet the NPDES Phase II requirements. The meetings were held (or will be held) at different locations in order to reach a broad audience. Participants learned about the regional effort to develop plans for effective stormwater management, and how the resulting programs will help protect our streams and wetlands. Topics included: impacts of stormwater, methods for managing stormwater runoff, benefits of stormwater management, regulatory requirements, and municipal plans and programs. The open houses were as follows:

- Monday, November 17, 2003 from 4-7 pm Held in Ashland
20 in attendance
- Thursday, January 22, 2004 from 4-7 pm Held in Medford
25 in attendance
- The spring 2004 meeting date and location are yet to be determined.

RVCOG participates in a bimonthly community television program “Regional Focus,” which educates the public on local issues. On November 10, 2003, the show focused on stormwater and the regional effort for developing Stormwater Management Plans to meet the NPDES Phase II requirements. The show was recorded and repeated 10 times throughout November and December. The show covered topics such as:

- The dynamics of stormwater runoff
- The importance of stormwater management
- The benefits of stormwater management
- Stormwater pollution prevention

- What members of the public can do if they see a problem.

Schedule & Completion Date: Speakers are available from RVCOG and the SWAT participating communities. The SWAT will maintain available speakers on stormwater issues.

Measurable Goal: Keep records of all stormwater presentations and the number of attendees or number of times the program was repeated.

Responsible Party: SWAT Members.

2.8 Create Stormwater Public Service Announcements [Optional]

[Regional Guide —Section 2.3.8]

No public service announcement (PSAs) have been scheduled within the first five years of the permit. This alternative will be investigated if grant funding becomes available or if it is found that other public education efforts are not adequate. RVCOG will investigate grant funding to broaden stormwater education including a PSA.

Schedule & Completion Date: Not scheduled for first five years of the program.

Measurable Goal: The number of PSAs during the first five years will be noted if any occur.

Responsible Party: None at this time.

2.9 Design a Stormwater Display

[Regional Guide —Section 2.3.9]

RVCOG has developed a large assortment of stormwater exhibits and display materials to be used throughout the region. RVCOG will periodically update these materials and make them available to the SWAT participating communities and others.

A “Stormwater in the Construction Industry” display is currently located at the City of Phoenix’s Public Works Department.

Schedule & Completion Date: These items already exist and will be periodically updated as needed.

Measurable Goal: This item will not have a measurable goal. RVCOG and several of the SWAT communities already have displays and more will be created as needed.

Responsible Party: RVS - Manager.

2.10 Create a Stormwater Web Site
[Regional Guide —Section 2.3.10]

RVCOG has begun developing a stormwater section on its website. At this time, the website includes a definition of stormwater, a discussion of the impacts of stormwater, and stormwater related links. The website address is as follows:

http://rvcog.org/MN.asp?pg=WR_Stormwater

Schedule & Completion Date: RVS has not scheduled the development of a web page. The RVCOG and each local community web page will on occasion include stormwater issues.

Measurable Goal: No measurable goal at this time.

Responsible Party: None.

3.0 STORMWATER PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM

RVS intends to participate in a regional stormwater public involvement and participation program with other members of the SWAT. The SWAT hired the RVCOG to assist in the development of a five-year program for public involvement. This program is discussed in detail in the *Regional Guide* and is summarized in Table 3-1. The SWAT members plan to work together to implement a regional Public Involvement and Participation Program and will investigate a cost effective method for implementing the regional program. One likely method would be to contract with RVCOG to implement the program.

TABLE 3-1. STORMWATER PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM							
BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Public Review/ Public Meetings	Yes	Partial					
Distribute News Releases	Yes	Partial					
Stormwater Advisory Team (SWAT)	Yes	Partial					

 Activity scheduled for permit year
 No activity scheduled for permit year

3.1 Public Review/Public Meetings *[Regional Guide —Section 3.3.1]*

RVS will work with the SWAT to investigate ways to encourage public involvement in stormwater activities. A significant amount of public input and involvement was included in development of the *Regional Guide*. This effort will continue throughout the five-year program and the SWAT is committed to working with interested individuals and groups. The program discussed in the *Regional Guide* will be developed to allow public comment on stormwater programs and projects.

Schedule & Completion Date: The regional effort for public review and public meetings started prior to the submittal of this program to the Oregon Department of Environmental Quality (DEQ). It will continue throughout the five-year program.

Measurable Goal: Hold at least one public meeting and publish at least two public notices during each year of the five-year program.

Responsible Party: RVS - Manager.

3.2 Distribute News Releases *[Regional Guide —Section 3.3.2]*

RVCOG distributed a news release to advertise the open houses for the Regional Stormwater Planning Project. There have been articles and news stories on stormwater, but more detailed articles are expected once the plans are developed.

Local news station KDRV TV-12 interviewed members of the SWAT following their meeting on Friday, January 23, 2004, in regard to the stormwater plans and programs being developed in the region.

Schedule & Completion Date: News releases will be distributed when the local press is available and interested in stormwater topics. No schedule for this has been developed and opportunities will depend on the news agencies' interest in stormwater activities.

Measurable Goal: At least one news release story on the stormwater program will be distributed to local papers each year starting in Permit Year 2.

Responsible Party: RVS - Manager.

3.3 Stormwater Advisory Team *[Regional Guide —Section 3.3.3]*

The SWAT has been developed for the region to coordinate regional stormwater programs. The SWAT is a stormwater advisory panel with key staff from each jurisdiction and will solicit input on the development and implementation of the stormwater program. Input will be solicited from representatives of businesses, industries, conservation groups, residential and civic associations, and other interested stakeholders.

Schedule & Completion Date: The SWAT has already been developed and the panel will have bimonthly or quarterly meetings to coordinate the regional effort. Input from representatives of the community will be solicited as needed for key decisions in the future.

Measurable Goal: Dates and attendance will be kept for each meeting. A summary of topics discussed and key decisions will be kept and submitted as part of the annual report.

Responsible Party: SWAT Members.

4.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

In order to meet regulations under 40 CFR 122.34(b)(3), an Illicit Discharge Detection and Elimination Program will be developed for RVS. Table 4-1 summarizes the best management practices (BMPs) that the program will include. In addition to these BMPs, brochures including information about illicit discharges will be created for the general public as a part of the Public Education program.

TABLE 4-1. ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM							
BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Create a System Map	No	Completed	*	*	*	*	*
Update System Map	No	Ongoing	*	*	*	*	*
Develop & Adopt Stormwater Ordinance	No	No					
Illicit Discharge Plan	Yes	Partial					
Field Inspections	Yes	Partial					
Spill Response Plan (create new plans or review and update existing plans)	Yes	Partial					
Enforcement Plan	Both	Partial					
Training for Staff	No	No					
* System maps already exist for the Cities of Central Point, Phoenix and Talent, so none needs to be created. The cities will update their maps annually. Jackson County has no map of its system within the RVS service area. A Jackson County map will be created by Year 5; until then, the County will have no map that requires updating.							

 Activity scheduled for permit year
 No activity scheduled for permit year

4.1 Storm Sewer System Map *[Regional Guide —Section 4.3.1]*

Storm sewer system maps already exist for the RVS and for the Cities of Central Point, Phoenix and Talent. Central Point’s drainage system includes 41 miles of storm drain pipeline; Talent’s system consists of 9.3 miles of pipeline and drainage ditches. The Phoenix drainage system consists of storm drain pipeline, drainage ditches and natural creeks. Phoenix’s system is divided into 12 major basins and 4 minor basins. Five of the basins drain into the Phoenix Irrigation Canal, three drain into Coleman Creek, one drains into Anderson Creek, one drains directly into Payne Creek, two are collected in detention ponds before discharge to the Payne Creek system, one drains into Old Bear Creek Channel, and three drain directly to Bear Creek. Existing storm system maps are included in Appendix C.

Mapping exists for White City of unincorporated Jackson County and Talent, Phoenix and Central Point. Mapping for the remaining portions of the Phase II boundary will be developed using the mapping guidelines in Appendix D.

Storm sewer system maps will be updated as a part of the Illicit Discharge Detection and Elimination activities and the Post-Construction program activities. As new development is permitted, the drainage system will be added to the base map.

Schedule & Completion Date: A storm drain system map for Jackson County will be developed using the guidelines and schedule in Appendix D. The other participating jurisdictions already have a system map.

Measurable Goal: Develop a system map for Jackson County according to the schedule in Appendix G.

Responsible Party: RVS - Manager.

4.2 Ordinance to Prohibit Non-Stormwater Discharges *[Regional Guide —Section 4.3.2]*

RVS will develop an ordinance to prohibit non-stormwater discharges within the service area. This ordinance will be developed, administered and enforced by RVS. Individual participating jurisdiction may adopt similar stormwater ordinance to better serve their citizens and to possibly provide a higher level of services however these ordinances will not be monitored and reported under this permit.

The RVS regional ordinances will be prepared as outlined in the *Regional Guide*.

Schedule & Completion Date: The stormwater ordinances are scheduled to be prepared in the two years and adopted in the third year of the five-year program.

Measurable Goal: Adopt ordinance by the end of Permit Year 3

Responsible Party: RVS Manager

4.3 Detect and Address Non-Stormwater Discharges *[Regional Guide —Section 4.3.3]*

An Illicit Discharge Plan will be prepared as outlined in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*. This will include a procedure for the inspection and detection of illicit discharges. RVS will participate in a regional program to detect and address illicit discharges. The following components will be included in the plan:

- Identification of priority areas for assessment
- Field assessment activities
- Routine schedule for system inspection
- Characterization of any discharges found
- Procedures to trace an illicit discharge
- Procedures to remove an illicit discharge.

Currently the City of Phoenix visually inspects storm drain facilities for flow during dry weather flow as part of its regular maintenance. This activity will continue and as part of

the Illicit Discharge Plan. A schedule for inspection and general procedures for tracing illicit flow will be formalized.

Jackson County and the Cities of Talent and Central Point have no formal illicit detection program. The City of Talent investigates for illicit discharge if flow is noticed during dry weather. The County investigates illicit discharges that are found during regular maintenance activities.

The new stormwater ordinances discussed in Section 4.2 will provide regulations for removing illicit discharges if detected.

Schedule & Completion Date: The Illicit Discharge Plan will be developed in Year 3 of the five-year program. General inspection for dry-weather flow will continue until this plan is developed.

Measurable Goal: Implement the program by the end of Permit Year 3

Responsible Party: RVS - Manager

4.4 Conduct Field Inspections

[Regional Guide —Section 4.3.4]

The Illicit Discharge Plan described in Section 4.3 will include a schedule and reporting procedures to be used for conducting field inspections. The outline of the plan can be found in the *Regional Guide*. At a minimum, each outfall shall be inspected on a three-year rotation. Appropriate actions will be taken to determine the source of any illicit discharges found during the inspections. If additional equipment is required to trace down dry-weather flows, video trucks can be hired by local contractors or through the RVS.

Currently, the Cities of Talent and Phoenix visually inspect storm drain facilities for flow during dry weather as part of their regular maintenance.

Schedule & Completion Date: The Illicit Discharge Plan will be developed in Year 3 of the five-year program. General inspection for dry-weather flow will continue until this plan is developed. Inspection and reporting, along with starting a cycle to ensure that all outfalls are inspected, are included in the inspection rotation and will start in Year 4 following the development of the plan.

Measurable Goal: Continue current inspection process until detection plan with inspection rotation is developed. Following development of the Illicit Discharge Plan, begin implementing the plan.

Responsible Party: RVS - Manager

4.5 Spill Response Plan

[Regional Guide —Section 4.3.5]

A Spill Response Plan shall be prepared as outlined in the *Regional Guide*. RVS will participate in a regional spill response program.

Currently, maintenance crews for Jackson County and the Cities of Talent and Phoenix respond to any reports of spills. In Central Point, the City's Emergency Response Plan directs the responder to contact a hazmat crew for toxic spills.

Schedule & Completion Date: The regional SWAT will address this issue and work with the Oregon Department of Transportation (ODOT) and DEQ to develop a regional plan to address spills. The regional plan will be prepared by Year 1 of the five-year program. County and City crews will continue to address minor spills, and methods for cleaning up spills will be part of a review of maintenance procedures under the Pollution Prevention Program for Municipal Operations (described in Section 7).

Measurable Goal: Implement regional spill plan by the end of permit Year 1

Responsible Party: RVS Manager

4.6 Plan for Enforcement Actions

[Regional Guide —Section 4.3.6]

In preparing the proposed new stormwater ordinances, each jurisdiction will investigate ways to allow them to require the removal of illicit connections. This will be coordinated with the work under Section 4.2 above.

Currently, none of the participating jurisdiction have adopted codes to require the removal of an illicit discharge; they contact the local DEQ office for enforcement action. Jackson County and the City of Phoenix make attempts to work with responsible parties when illicit discharges are discovered to eliminate the source or to route the flow to a sanitary sewer if allowable.

Schedule & Completion Date: The stormwater ordinance is scheduled to be prepared in the first year and adopted in the second year of the five-year program.

Measurable Goal: Adopt ordinance by the end of Permit Year 2

Responsible Party: RVS - Manager.

4.7 Train Municipal Staff on Spill and Illicit Discharge BMPs

[Regional Guide —Section 4.3.7]

Once the other items described in this section are completed, appropriate municipal staff will be trained on the proper BMPs to use for spill response and illicit discharge detection and removal. The staff training will occur in combination with training for Pollution Prevention. "Refresher" training will update staff on changes to the procedures as needed. RVS will participate in a regional training program for municipal staff.

Schedule & Completion Date: The training of staff will begin in Year 1 with refresher courses and courses for new staff conducted annually. Selected staff will go to regional training classes and develop a program to train all staff within the municipal crews.

Measurable Goal: The number of hours spent in training along with subjects will be documented and reported annually.

Responsible Party: RVS Manager

5.0 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL PROGRAM

In order to meet regulations under 40 CFR 122.34(b)(4), RVS will develop, implement, and enforce a program to reduce pollutants in any stormwater runoff from construction activities. The regulations covering this activity will be part of the overall stormwater ordinances being developed in the first year of the five-year program, as described in Section 4.2. The size of the construction activity covered by the ordinances will be determined during the ordinance development. They will cover, at a minimum, construction activity of 1 acre or larger. Table 5-1 summarizes the required elements of a construction-site stormwater runoff control program.

BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Develop & Adopt Stormwater Ordinance	No	No					
Develop Regional Erosion Control Manual (or adopt state or other manual)	No	No					
Develop Expertise in Review & Inspection (Staff Training)	No	No					
Training for Contractors and Developers	Yes	No					
Review Erosion Control Plans	No	No	*	*			
Receive Information from Public	Yes	No					
Inspect Construction Sites	No	No					
Information Brochures for Contractors	Yes	No					

* The Cities of Central Point and Talent will continue their current programs for reviewing erosion control plans until new review requirements under the proposed stormwater ordinances are put in place in Year 3.

 Activity scheduled for permit year
 No activity scheduled for permit year

5.1 Adopt an Erosion and Sediment Control Ordinance *[Regional Guide —Section 5.3.1]*

The proposed municipal stormwater ordinances described in Section 4.2 will establish requirements related to erosion control and construction site runoff. The ordinances will include requirements for projects disturbing at least 1 acre. This threshold could be smaller, depending on meetings with governing bodies and the regional approach. Construction sites will be required to comply with erosion and sediment control requirements in a to-be-defined Design Manual. This will either be the new manual being developed by DEQ or an existing erosion control manual. The ordinances will be prepared as outlined in the *Regional Guide*.

Currently, Section 800 of the City of Central Point Department of Public Works' *Standards and Specifications* requires erosion prevention and sediment control. The regulations apply to all construction sites that may produce any soil erosion, sediment, or other undesirable substances. An "Erosion Prevention Permit" is required prior to any construction work. The standards require that a Construction Site Management Plan (CSMP) be prepared for all

projects. The contractor is required to designate one employee as the Erosion and Sedimentation Control Manager (ESCM), who shall be responsible for ensuring that erosion and sediment control BMPs are installed and maintained correctly.

The City of Talent currently has Storm Drainage Design Standards that include erosion and sediment control requirements for all development sites in addition to the erosion control plan requirement of DEQ. The standards require that erosion control measures be incorporated into excavation, construction, and post-construction site management practices to control runoff, erosion and sediment until vegetation and other measures effectively stabilize the site. The standards also require temporary erosion control for all aspects of subdivision construction.

Phoenix City Ordinance 792, which prohibits track-out onto city streets, is the only Phoenix ordinance at this time that specifies erosion control practices.

Schedule & Completion Date: The stormwater ordinances are scheduled to be prepared in the first year and adopted in the second year of the five-year program.

Measurable Goal: Adopt ordinance and design manual by the end of Permit Year 2

Responsible Party: RVS Manager working with Public Works Directors of the participating jurisdictions

5.2 Train Plan Reviewers and Field Inspectors

[Regional Guide —Section 5.3.2]

The participating jurisdictions will train staff responsible for reviewing plans and inspecting construction sites to ensure that erosion and sediment control BMPs are properly installed and maintained. If possible, training will be coordinated with training on post-construction stormwater management. “Refresher” training will update staff on changes to the procedures as needed. RVS will participate in a regional training program. This will include training programs by DEQ and RVCOG.

Schedule & Completion Date: Train plan reviewers and field inspector by the end of Permit Year 2

Measurable Goal: The number of hours spent in training along with subjects will be documented and reported annually.

Responsible Party: RVS Manager working with DEQ and/or RVCOG.

5.3 Review Site Plans for Erosion and Sediment Controls

[Regional Guide —Section 5.3.3]

Once a stormwater ordinance is adopted, construction site plans will be reviewed to ensure that they are in compliance with local ordinances and stormwater management manuals. Plans will also be reviewed for appropriate use of erosion and sediment BMPs as well as post-construction controls.

Currently, the City of Central Point's Standards and Specifications Section 800 states that the Public Works Department will provide a written evaluation of the Construction Site Management Plan (CSMP) within 15 business days of receipt. Plans are being reviewed for compliance with the City's design standards. Although Central Point reviews Erosion Control Plans prior to construction, inspectors do not have the authority to enforce erosion control practices as the City has not yet adopted an erosion control ordinance.

In the City of Talent, erosion control plans are reviewed by the City, and the Public Works Department conducts periodic inspections. Public Works requires that erosion control measures be repaired if it is found that eroded material is leaving the site. The City also requires biofiltration bags to protect storm drains if the construction occurs along a paved street and that the storm drain be cleaned out if materials do enter the system.

Schedule & Completion Date: The Cities of Talent and Central Point will continue their current processes for review of erosion control plans. Beginning in Year 3, all jurisdictions will review erosion control plans as outlined in the proposed new stormwater ordinances. Until that time, Jackson County and the City of Phoenix will use the 1200-C permit process administered by DEQ to review and control construction runoff.

Measurable Goal: Once this effort has started, City and County staff will monitor the number of permit reviews, the number of on-site inspections, and the number of on-site revisions required. If enforcement is required, this will also be recorded. All records will be reported annually.

Responsible Party: DEQ for first two years; RVS - Manager beginning in Year 3.

5.4 Receive Information from Public

[Regional Guide —Section 5.3.4]

Brochures, permit applications, and other publications relating to erosion control will include the phone number of the local Public Works Department to allow the public to report complaints or comments regarding construction-site runoff. These comments and follow-up activities will be monitored internally by City and County staff. The local construction inspector will receive information on complaints by the end of the day and will be responsible for following up on each complaint within two days. The phone number will be published in the local phone book, in stormwater brochures, and on the RVCOG stormwater website. RVCOG has a "Hot Spot" contact list for spills and dumping located on the RVCOG website.

Schedule & Completion Date: All new erosion control publications will include the phone number for complaints.

Measurable Goal: Record the number of complaints received and handled, and submit with the annual report.

Responsible Party: RVS Manager and Public Works Directors of the participating jurisdictions

5.5 Inspect Construction Sites

[Regional Guide —Section 5.3.5]

All construction sites that are required to submit site plans for erosion and sediment control will be inspected to ensure that the selected BMPs are installed and maintained correctly. Site plans must also reflect changes made on-site after the plans were reviewed. The frequency of inspection will be determined based on the complexity of the project and the prioritization criteria presented in the *Regional Guide*. Each construction site shall be inspected at least once.

The City of Central Point's Standards and Specifications Section 800 requires that the Erosion and Sediment Control Manager (ESCM) on site assume responsibility for regular inspection and maintenance of erosion and sediment control measures. The ESCM must be approved by the Public Works Department prior to construction.

Schedule & Completion Date: Inspection will start in Year 3 of the program. Until then, the City of Central Point's inspection requirements for ESCMs will continue.

Measurable Goal: Records of the inspections and any follow-up work will be kept and submitted annually.

Responsible Party: RVS Manager

5.6 Provide Information on Training for Construction Operators

[Regional Guide —Section 5.3.6]

A brochure on construction-site erosion control and post-construction controls will be prepared and distributed (see Section 2.3). This will include brief descriptions of methods, sources of information for erosion control methods, including DEQ's manual and websites. The brochure will also include information on training available for local construction operators. The training will be either by DEQ as part of its erosion control manual or led by RVS.

Schedule & Completion Date: Develop erosion control brochure by Year 2. Schedule a class for construction operators in Year 4. It is assumed that the DEQ training courses will be sufficient in Years 1 through 3.

Measurable Goal: Document the distribution of the erosion control brochure and the scheduled classes along with attendance, and submit with the annual report.

Responsible Party: RVS - Manager

6.0 POST-CONSTRUCTION STORMWATER MANAGEMENT PROGRAM

In order to meet regulations under 40 CFR 122.34(b)(5), the RVS will develop a program for post-construction stormwater management. Table 6-1 summarizes required elements of the program.

BMP Activity / Description	Regional Activity ?	Current Activity?	Permit Year				
			1	2	3	4	5
Develop & Adopt Stormwater Ordinance	No	No					
Develop (or adopt existing) Regional Design Manual [opt. each Jurisdiction Develop Manual]	Yes	No					
Develop Regional Expertise in Review & Inspection (Staff Training)	Yes	No					
Training for Local Engineers and Developers	Yes	No					
Review of Site Plans and Inspection for Post-Construction BMPs	Yes	No					

	Activity scheduled for permit year
	No activity scheduled for permit year

6.1 Ordinance Requiring Post-Construction Control

[Regional Guide —Section 6.3.1]

The proposed municipal stormwater ordinances described in Section 4.2 will establish requirements addressing post-construction runoff. The new ordinances will also require post-development water quality BMPs to be used on all new construction. The ordinances will be prepared as outlined in the *Regional Guide*.

Policy 3 in Chapter F of the Talent Public Facilities and Services Element includes requirements for the stormwater system in Talent. Strategy 3.1.2 requires that stormwater design standards be followed for all new construction. Section II Part 6 of the Design Standards require retention/detention facilities to maintain surface water discharge rates at or below the existing design storm peak discharges, except when it can be demonstrated to the City Engineer that there will be no adverse impact. Section II Part 7 of the Design Standards requires that release rates be reduced to below the 10-year frequency design storm for existing land use conditions and that increases in downstream flooding be prevented.

The Stormwater Master Plan for the City of Phoenix (November 2001) recommends that new development control flow from the project site to ensure peak flow rates do not exceed the predevelopment peak flow rate for a 10-year storm. However, since a stormwater ordinance does not yet exist, the City does not have the authority to enforce this policy.

Central Point does not currently have an ordinance in place, but the City requires detention for a system if the downstream storm drain system cannot adequately handle the increase in flow.

Schedule & Completion Date: The stormwater ordinance is scheduled to be prepared in the first year and adopted in the second year of the five-year program.

Measurable Goal: RVS adopt ordinance by the end of Permit Year 2

Responsible Party: RVS Manager

6.2 Develop a Plan to Address Post-Construction Runoff

[Regional Guide —Section 6.3.2]

RVS will work with local jurisdictions to adopt a regional design manual for addressing stormwater issues. The manual will include construction-site erosion and sediment controls as well as design guidelines for post-construction water quality BMPs and runoff quantity control. A new manual will be developed or an existing one will be adopted. RVS has agreed to work with the regional SWAT in an attempt to bring regional consistency with development standards and runoff control standards.

Training for local engineers and developers will be available regionally.

Schedule & Completion Date: Implement plan by the end of permit Year 3

Measurable Goal: The adoption of the ordinance by Year 2 and design manual by Year 3 will be the measurable goals for this activity.

Responsible Party: RVS - Manager

6.3 Training for Plan Reviewers and Field Inspectors

[Regional Guide —Section 6.3.3]

RVS will work with other jurisdictions to train city staff responsible for reviewing plans and inspecting construction sites to ensure that appropriate post-construction stormwater management is employed. If possible, training will be coordinated with training on erosion and sediment control BMPs. “Refresher” training will update staff on changes to the procedures as needed.

Schedule & Completion Date: Train plan reviewers and field inspectors by the end of Permit Year 2.

Measurable Goal: The number of hours spent in training, along with subjects, will be documented and reported annually.

Responsible Party: RVS Manager

6.4 Site Plan Review for Post-Construction BMPs

[Regional Guide —Section 6.3.4]

Once the stormwater ordinances are adopted and design criteria or a design manual is developed, RVS will participate in a regional effort to start reviewing permit applications for compliance with ordinances and stormwater management manuals. Plans will also be reviewed for appropriate post-construction controls as well as erosion and sediment BMPs.

Schedule & Completion Date: Site plan submittals will be a part of the building permit application plan. Stormwater management will be required prior to Year 3 in the program.

Measurable Goal: The number of reviews, along with staff time, will be documented and reported annually.

Responsible Party: RVS Manager

6.5 Inspections of Structural Post-Construction BMPs *[Regional Guide —Section 6.3.5]*

All construction sites that are required to submit site plans for post-construction BMPs will be inspected to ensure that the selected BMPs are installed and maintained correctly. Site plans must also reflect changes made on-site after the plans were reviewed.

Schedule & Completion Date: Inspection will start in Year 3 of the program.

Measurable Goal: Records of the inspections and any follow-up work will be kept and submitted annually.

Responsible Party: RVS Manager

7.0 POLLUTION PREVENTION IN MUNICIPAL OPERATIONS PROGRAM

In order to meet regulations under 40 CFR 122.34(b)(6), the participating jurisdictions will develop formal operations and maintenance (O&M) plans. Basically, most County and City operations already meet the requirements for NPDES, and the O&M plans will be a documentation of existing activities with minor modifications to reduce pollutants. Table 7-1 summarizes the requirement elements of a municipal operations program.

TABLE 7-1. POLLUTION PREVENTION IN MUNICIPAL OPERATIONS PROGRAM								
BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year					
			1	2	3	4	5	
Develop O&M Plan	No	No						
Develop Park/Open Space O&M Guide	No	Partial						
Vehicle/Equipment Washing BMPs	No	Completed	*	*				
New Construction and Land Disturbance	Yes	No						
Dust Control BMPs	Yes	No						
Stormwater System Maintenance	No	Partial						
Open Channel/Structural BMPs	No	No						
Deicing BMPs (i.e. sanding and sweeping)	No	Yes						
Flood Management BMPs	No	Partial						
Training for Employees on O&M	No	No						

* Jackson County and the City of Central Point currently meet the requirements for this activity.

- Activity scheduled for permit year
- No activity scheduled for permit year

7.1 Operation and Maintenance Plan *[Regional Guide —Section 7.3.1]*

The participating jurisdictions will review existing municipal O&M activities and document the activities in an O&M Plan that addresses municipal activities. The O&M Plan will include the following:

- Descriptions of required maintenance activities and procedures as they relate to existing municipal operations and programs
- A list of responsible departments and personnel for each activity
- A schedule of activities, including maintenance, inspections and reports
- Review of the maintenance of parks and open space
- Review of the use of herbicides and pesticide and a requirement to maintain records when they are applied.

The following sections discuss the particular maintenance activities to be addressed in further detail. Practices for each maintenance activity will be prepared as outlined in the *Regional Guide*.

Schedule & Completion Date: Prepare O&M Plan in Year 1 and implement the plan by the end of permit Year 2

Measurable Goal: Plan preparation and records of all herbicide and pesticide use are the measurable goals for this activity.

Responsible Party: RVS Manager working with Public Works Directors of participating jurisdictions

7.2 Park and Open Space Maintenance

[Regional Guide —Section 7.3.2]

The participating jurisdictions will review parks and open space maintenance as part of the development of O&M plans described in Section 7.1. In the City of Talent, all herbicide and pesticide applications currently are performed by a licensed applicator.

Currently, any herbicide or pesticide application is performed by a licensed applicator.

Schedule & Completion Date: Same as Section 7.1.

Measurable Goal: Same as Section 7.1.

Responsible Party: Public Works Directors of participating jurisdictions

7.3 Vehicle and Equipment Washing

[Regional Guide —Section 7.3.3]

The City of Central Point recently installed a self-contained vehicle washing facility with a filtration system. Once the O&M Plan is adopted, the City will continue to follow practices developed in the Plan.

Jackson County has a covered, self-contained vehicle washing facility with a baffled settling tank; wash water is discharged to the sanitary sewer. When the settling tank is cleaned, the solids are tested to determine how the waste is disposed of. Once the O&M Plan is adopted, the County will continue to follow practices developed in the Plan.

The City of Talent currently performs brush off and washing of vehicles at Public Works; water is discharged through a field that is not directly adjacent to a creek. The runoff from the location where vehicles are washed currently infiltrates.

The Cities of Talent and Phoenix will implement vehicle and equipment washing practices as developed in the O&M Plan. All publicly owned vehicles will be washed in a self-contained covered building or a designated wash area that meets the required criteria presented in the *Regional Guide*.

Schedule & Completion Date: Jackson County and the City of Central Point currently meet the vehicle and equipment washing requirements. The Cities of Talent and Phoenix will implement practices by the end of permit Year 3.

Measurable Goal: No measurable goal for this activity has been established for Jackson County or the Cities of Central Point and Talent. For the City of Phoenix, the construction of a self-enclosed vehicle wash pad will be the only measurable goal.

Responsible Party: RVS Manager working with Public Works Directors of participating jurisdictions

7.4 New Construction and Land Disturbances

[Regional Guide —Section 7.3.4]

The participating jurisdictions will participate in a regional effort to implement BMPs for public construction projects as developed in the O&M Plan. Public construction projects will be required to follow the same requirements and procedures as private development. Construction will be required to following local ordinances and stormwater management manuals.

In Jackson County, projects over 1 acre currently are required to obtain a 1200-C permit through DEQ, which includes erosion control. Erosion control measures are used on County maintenance projects that are close to creeks and as required by U.S. Army Corps of Engineers permits.

Schedule & Completion Date: Implement practices by the end of permit Year 3

Measurable Goal: Records of BMPs for public construction projects will be kept, inspections records and any follow-up work will be kept and submitted annually.

Responsible Party: RVS Manager working with Public Works Directors of participating jurisdictions

7.5 Dust Control Practices

[Regional Guide —Section 7.3.5]

As part of the erosion control program, participating jurisdictions will include dust control BMPs for public construction projects. Public construction projects will be required to follow appropriate BMPs to minimize and control dust.

Jackson County currently uses lignin sulfate for dust control. The County works with property owners for dust control on dirt roads within the county. About two-thirds of the cost for dust control is covered by the County and the property owner covers about one-third of the cost. The County also implements dust control for construction projects on dirt roads.

Schedule & Completion Date: Implement practices by the end of permit Year 3

Measurable Goal: No separate measurable goal for this activity.

Responsible Party: RVS Manager working with Public Works Directors of participating jurisdictions

7.6 Stormwater System Maintenance *[Regional Guide —Section 7.3.6]*

The participating jurisdictions will continue to implement their existing stormwater system maintenance schedules. The programs will be documented in the O&M Plans. The following are the existing activities and schedules for maintenance performed on the storm drain system in each jurisdiction:

- Central Point:
 - Storm Drain System—Hydrovac annually
 - Street Sweeping—Primary streets are swept twice per week (sweeping frequency is increased if needed)
- Talent:
 - Storm Drain System—Hydrovac annually
 - Street Sweeping—Contracted to Jackson County; monthly street sweeping, with more frequent sweeping on primary streets
- Phoenix:
 - Catchbasins—Cleaned annually
 - Storm Drain Mainlines—Hydrovac annually
 - Street Sweeping—Every two weeks (approximately every three days in the fall); the City has a regenerative air street sweeper.
 - Filter Vault—Cleaned annually
 - Weeds in ditches—Use weed-eater as needed in summer
 - Detention Ponds—Cleaned every three years
 - Track-out violations reported to police—Ongoing
 - Free fall leaf pickup service for local residents.
- Jackson County:
 - Catchbasins—Cleaned annually
 - Street Sweeping—At least every two weeks
 - Flushing of flat grade pipes—As needed
 - A hydrovac truck is used for catchbasin and culvert cleanings.

Schedule & Completion Date: Current activity will be continued.

Measurable Goal: Maintain records of maintenance activities

Responsible Party: RVS Manager working with Public Works Directors of participating jurisdictions

7.7 Open Channels and Structural Stormwater Controls

[Regional Guide —Section 7.3.6.1]

Open channel and structural stormwater controls will be inspected and maintained regularly. Waste from the stormwater controls will be disposed of properly, and records of cleaning and maintenance will be kept.

The City of Central Point currently requires that residences along creeks maintain vegetation and keep the portion of the creek on their property clear of debris.

The City of Phoenix mows open channels to control vegetation, which maintains the stability of the bank and the filtering properties of the vegetation. In previous years the City completely removed vegetation from ditches, but this practice has since been halted.

Jackson County does not perform work on private property. The County is limited to the right-of-way for maintenance activities; this includes cleaning of ditches and open channels. The County follows ODOT's best management practices for ditch maintenance, which recommends leaving some vegetation in the ditch to maintain the stability of the bank and the filtering properties of the vegetation.

Schedule & Completion Date: Implement practices by the end of permit Year 3

Measurable Goal: Maintain records of maintenance activities

Responsible Party: RVS Manager working with Public Works Directors of participating jurisdictions

7.8 Road, Highway and Parking Lot Maintenance

[Regional Guide —Section 7.3.6.2]

The Central Point Road Department currently follows pollution prevention/good housekeeping practices with its street sweeping. Once the O&M Plan is adopted, the Road Department will continue to following practices developed in the Plan. The City does not have snow removal, deicing, or sanding equipment. The City conducts street sweeping on primary streets twice a week. Sweeping is increased as needed.

Jackson County currently follows ODOT's *Routine Road Maintenance—Water Quality and Habitat Guide Best Management Practices* (July 1999) when performing County street maintenance. This includes sanding, followed by street sweeping. The County contracts to ODOT for deicing activities. The County conducts street sweeping every two weeks with a regenerative air street sweeper. Streets are also swept if material from street sanding builds up.

The City of Talent contracts out to Jackson County for sanding and street sweeping needs. Street sweeping in Talent is conducted each month. Primary streets are swept more frequently. Once the O&M Plan is adopted, this practice will continue to be followed.

The City of Phoenix also follows ODOT's *Routine Road Maintenance —Water Quality and Habitat Guide Best Management Practices* when performing street maintenance. This includes sanding for deicing, followed by street sweeping. The City conducts street

sweeping every two weeks. During the fall when leaves can be a problem in storm drains, street sweeping is performed approximately three times per week.

Schedule & Completion Date: Current activity will be continued.

Measurable Goal: Maintain records of maintenance activities

Responsible Party: RVS Manager working with Public Works Directors of participating jurisdictions

7.9 Flood Management Projects *[Regional Guide —Section 7.3.6.3]*

The participating jurisdictions will implement flood management project evaluation and review procedures as developed in the O&M Plans. All new flood management projects will include water quality considerations. Priority existing flood management projects will be identified and reevaluated with water quality considerations.

The *Stormwater Master Plan* (January 1999) for the City of Talent did not include options to address water quality specifically. However, a regional detention facility was presented as an alternative, which could be designed to provide water quality benefits. Additionally, a recently constructed system upgrade included the installation of approximately six new water quality catchbasins on one of the main streets in Talent.

The City of Phoenix has a Stormwater Master Plan (November 2001) that outlines capital improvement projects for flood management. The Stormwater Master Plan considered the upcoming NPDES regulations; therefore a capital improvement program was developed that includes water quality concerns. The following is a list of recently-completed capital improvements projects, including water quality considerations, for the City of Phoenix:

- South Phoenix Road wetland
- Phoenix Hill Detention Pond
- Fern Valley Road/Luman Road Detention Pond
- Fern Valley Road/N Phoenix Road Detention Pond
- Skyline Detention Pond
- 4th Street—Rose to Main storm drain upgrade includes a filter vault
- 4th Street and Rose—School district parking lot includes roadside detention

Schedule & Completion Date: Jackson County and the Cities of Central Point and Talent will review flood management projects for opportunities to include water quality consideration by the end of permit Year 5. The City of Phoenix will continue to implement its Stormwater Master Plan.

Measurable Goal: Report annually any capital expenditures for stormwater improvements.

Responsible Party: RVS Manager working with Public Works Directors of participating jurisdictions

7.10 Employee Training on O&M Implementation
[Regional Guide —Section 7.3.7]

The participating jurisdictions will train municipal staff on operation and maintenance procedures as described in the O&M Plan. Training will be general for all municipal employees and more specific training will be included for specific program areas. “Refresher” training will update staff on changes to the procedures annually.

Schedule & Completion Date: Implement practices by the end of permit Year 2

Measurable Goal: The number of hours spent in training, along with subjects, will be documented and reported annually.

Responsible Party: RVS Manager working with Public Works Directors of participating jurisdictions

8.0 EVALUATION AND ASSESSMENT

In preparation for the annual reporting requirements, RVS and the participating jurisdictions will document program implementation and progress. The measurable goals listed in this program are initial goals. RVS and the participating jurisdictions are working toward meeting the requirements for the Phase II permit that are not currently being implemented. The measurable goals in this program reflect the implementation schedule of each required activity. Once an activity has been implemented, the measurable goals for that requirement will be revised to track the progress of implementation, effectiveness or environmental improvement as appropriate.