



# City of Oregon City, Oregon

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## National Pollutant Discharge Elimination System Municipal Separate Storm Sewer System Discharge Permit

### **2024–2025 Annual Report**

*Prepared for the*

Oregon Department of Environmental Quality

December 1, 2025

*Assisted By:*




**CITY OF OREGON CITY**

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
MUNICIPAL STORMWATER SYSTEM ANNUAL REPORT**

**JULY 1, 2024 – JUNE 30, 2025**

I, the undersigned, hereby submit this National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater System Annual Report in accordance with NPDES Permit No. 101348. 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.

  
\_\_\_\_\_  
Vance Walker  
Public Works Operations Assistant Director  
City of Oregon City

11-10-2025  
\_\_\_\_\_  
Date



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## **1.0 INTRODUCTION**

### **1.1 NPDES MS4 Permit Background and Permit Renewal**

The Oregon Department of Environmental Quality (DEQ) regulates stormwater runoff from the City of Oregon City (City) through the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit (Permit) No. 101348, issued to Clackamas County and its co-permittees. Clackamas County co-permittees include the City of Oregon City along with the cities of Lake Oswego, Gladstone, West Linn, Milwaukie, Wilsonville, Happy Valley, Johnson City, and Rivergrove, the Oak Lodge Water Services District, Water Environment Services, and Clackamas County. Each co-permittee is a relatively small community, most having populations under 30,000 with some (Johnson City, Rivergrove) having populations significantly smaller.

The 2017 Permit Renewal Application required an evaluation of proposed program and Stormwater Management Plan (SWMP) modifications, development of Total Maximum Daily Load (TMDL) benchmarks, mapping, a maximum extent practicable (MEP) evaluation, updates to the City's environmental monitoring program, and an evaluation of proposed service area expansions and associated pollutant load estimates. The City's renewed NPDES MS4 Permit became effective on October 1, 2021.

Each co-permittee is required to submit an annual report, summarizing accomplishments and implementation of their individual SWMPs. This annual report documents stormwater management activities from July 1, 2024, to June 30, 2025 in conjunction with the City's 2021 NPDES MS4 Permit. Oregon City submitted a new SWMP that reflects the requirements of the 2021 NPDES MS4 Permit in November, 2022. DEQ accepted the new SWMP in March of 2023. The 2022 SWMP measurable goals were accomplished for the reporting year 2024 – 2025.

### **1.2 Document Organization**

Table 1 outlines the organization of this annual report document, with respect to the annual reporting requirements per Schedule B.5 of the City's 2021 – 2026 Permit. Reporting year 2024-2025 is the first full year that Oregon City began implementing the 2022 SWMP as reflected in Appendix A "measurable goals" and "tracking measures."

**Table 1: Summary of the NPDES MS4 Annual Report Requirements**

Annual reporting requirement	Location in document
a) Status of implementing the stormwater management program and each control measure program element in Schedule A.3, including progress in meeting measurable goals and program tracking and assessment metrics identified in the SWMP Document.	Appendix A
b) A summary of the adaptive management implementation and any changes or updates to programs made during the reporting year, including rationales for any proposed changes to the SWMP, and review of related new and historical monitoring data. This summary should also include discussion of the implications of or any findings related to recent years' adaptive management and/or changes made to the SWMP Document.	Section 2.0
c) Any proposed changes to SWMP program elements that are designed to reduce TMDL pollutants.	Section 2.0
d) A summary of education & outreach and public involvement activities, progress toward or achievement of measurable goals, and any relevant assessment of those activities. This should include planned adaptive management or other program enhancements to occur in the following years.	Appendix A and Appendix B
e) A summary describing the number and nature of enforcement actions, inspections, and public education programs, including results of ongoing field screening and follow-up activities related to illicit discharges. <sup>a</sup>	Appendix A (BMP IL-3 and IL-4)
f) A list of entities referred to DEQ for possible 1200-Z NPDES general permit coverage based on co-permittee screening activities, a list of categories of facilities inspected, and an overview of the results of inspections of commercial and industrial facilities.	Appendix A (BMP IC-1)
g) A summary of total stormwater program expenditures and funding sources over the reporting fiscal year, and those anticipated in the next fiscal year.	Section 3.0
h) A summary of monitoring program results, including monitoring data that are accumulated throughout the reporting year submitted in the DEQ-approved Data Submission Template, and any assessments or evaluations of that data completed by the co-permittees or an authorized third party.	Section 4.0 & Data Submitted Online
i) Any proposed modifications to the monitoring plan that are necessary to ensure that adequate data and information are collected to conduct stormwater program assessments.	Section 4.0
j) An overview, as related to MS4 discharges, of concept planning, land use changes and new development activities (including the number of new post-construction permits issued) that occurred within the UGB expansion areas during the reporting year, and those forecast for the following year, where such data is available.	Section 5.0
k) The details of all corrective actions implemented during the reporting year.	All corrective actions were covered under the Illicit Discharges Program (see BMP IL-3 in Appendix A)

<sup>a</sup> Enforcement actions, inspections, and public education programs are included in the City's SWMP as BMPs, and are reported along with the status of implementing all components of the SWMP in Appendix A.

Each section of this report corresponds to the specific Permit requirements in Schedule B.3. This report emphasizes efforts and activities associated with individual Best Management Practices (BMPs) from the City's 2022 SWMP, as summarized in Appendix A.

The City's annual report for the Willamette Basin TMDL Implementation Plan is included as Appendix C.

## **2.0 ADAPTIVE MANAGEMENT PROCESS IMPLEMENTATION**

### **2.1 Adaptive Management Program**

In accordance with the issuance of the City's NPDES MS4 Permit (in 2012), the City was required to document their adaptive management approach to assess annually and modify, as necessary, existing and new SWMP components. The City submitted their approach to DEQ on November 1, 2012.

Historically, the City has implemented adaptive management principals to annually refine implementation methods and data collection activities in conjunction with their effective SWMP and BMPs. More significant modifications to SWMP activities occur every 5 years, in conjunction with their Permit renewal application and updated Permit requirements. The City's submitted adaptive management approach is consistent with the City's historical approach for implementing adaptive management principals.

Annually, as the City completes their NPDES MS4 annual report, the City reviews SWMP implementation through BMP-specific measurable goals and tracking measures. The City collects data and feedback from staff responsible for implementing and reporting on each BMP to gage whether implementation was deemed to be effective or whether there are suggested improvements to be made. Suggested adjustments to BMP implementation include consideration of resource availability, budget/ funding, and overall need.

Every 5 years, during the Permit renewal process and SWMP update effort, additional factors are considered as part of the City's overall adaptive management process. These factors include more detailed information related to BMP implementation, such as:

1. Whether technology or information is available that would help improve or refine BMPs,
2. How representative are the measurable goals and tracking measures to the BMP objective, and
3. Are resources available to make changes to the measurable goals and BMP objectives?

Additionally, at the end of the Permit term, technical investigations and studies completed over the Permit term are reviewed and used to help target and identify specific issues that need to be addressed to maintain waterbody health and help formulate BMP activities (measurable goals and tracking measures). During the 2012-2017 Permit term, such technical studies included a water quality trends analysis, pollutant load reduction evaluation, hydromodification assessment, and a retrofit assessment.

During the 2016-2017 Permit renewal application process, the City, with the assistance of a consultant, reviewed the adaptive management evaluation factors and the studies listed above. This information informed the City's MEP evaluation and proposed SWMP changes submitted as part of the Permit Renewal Application. Proposed program changes were categorized as an organizational change, a removed activity (due to completion), an implementation change (due to identified efficiencies and adjustments to internal processes and procedures), and a change due to consolidation of activities. An updated (2017) SWMP was also included, reflecting refinement of BMPs, measurable goals, and tracking measures, for use in future permit negotiations and reissuance. After the new Permit was issued in 2021 the city, with the help of a consultant, developed a new SWMP and submitted it in November of 2022 and it was accepted by the DEQ in March of 2023.



## **2.2 SWMP Updates for the 2024 – 2025 Reporting Year**

The 2023-2024 reporting year was the first year in which the City's current 2022 SWMP was implemented. The new SWMP was produced with measurable goals and tracking measures, to reflect the new 2021 Permit and was accepted by the DEQ in March 2023. December 1, 2023, and December 1, 2024, minor changes were made to the SWMP and are summarized in a Revisions Log which is included as Appendix C of the SWMP. No changes were made to the SWMP for this reporting year.

## **2.3 Monitoring Plan Updates for the 2024 – 2025 Reporting Year**

As documented previously, the 2017 Comprehensive Clackamas County Stormwater Monitoring Plan (CCCSMP) is the effective monitoring plan for the City of Oregon City. The CCCSMP was updated in June of 2023 to reflect the new (2021) Permit monitoring requirements (Mercury, Pesticides, Dissolved Organic Carbon, & Alkalinity). The new monitoring plan became effective July 1, 2023, and covers the extent of this report's monitoring period.

## **3.0 SUMMARY OF PROGRAM EXPENDITURES**

A summary of the City of Oregon City's revenue and expenditures for the 2024–2025 fiscal year and a projection of the City's revenue and expenditures for the 2025–2026 fiscal year are provided in Table 2, below. Projection of expenditures is considered draft at this time.

**Table 2: Summary of Program Expenditures**

**Stormwater Fund (530)**

City of Oregon City

	Fiscal Year			
	2024	2025	2026	2027
	Audited	Unaudited	Adopted	Adopted
	Actual	Actual	Budget	Budget
<b>Beginning Fund Balance</b>	\$ 3,329,649	\$ 3,609,655	\$ 3,666,500	\$ 3,668,200
Stormwater Fee Rates (per EDU per month)	Rate = \$12.66 / \$13.68  8% rate increase	Rate = \$13.68 / \$14.77  8% rate increase	Rate = \$14.77 / \$15.95  8% rate increase	Rate = \$15.95 / \$16.43 8% / 3% rate increase
<b>Revenues</b>				
Charges for Service	3,946,580	4,308,603	4,635,000	4,877,000
Intergovernmental	943	-		
Interest Income	134,638	134,553	151,100	158,200
Miscellaneous Income	36,548	880		
Erosion Control Permits	11,176	17,069	7,000	7,000
Project Management	16,315	27,720	12,600	23,400
<b>TOTAL Revenues</b>	4,146,201	4,488,825	4,805,700	5,065,600
<b>Expenditures</b>				
Personnel Services	1,453,963	1,516,375	1,585,000	1,636,200
Materials & Services	1,561,685	1,715,309	2,275,200	2,081,200
Capital Outlay Totals	397,066	620,948	616,100	1,584,000
Debt Service	1,481	1,481	1,700	1,700
Total Transfers	452,000	475,000	326,000	269,000
<b>TOTAL Expenditures</b>	3,866,195	4,329,114	4,804,000	5,572,100
<b>Change in Fund Balance</b>	280,006	159,711	1,700	(506,500)
<b>Ending Fund Balance</b>	\$ 3,609,655	\$ 3,769,365	\$ 3,668,200	\$ 3,161,700
<b>Capital Outlay - Details</b>				
Operations New Equip. >\$5000	\$ -	\$ -	\$ 52,100	\$ -
Capital Construction	397,066	620,948	564,000	1,584,000
	\$ 397,066	\$ 620,948	\$ 616,100	\$ 1,584,000
<b>Transfers - Details</b>				
Transfer to Building Reserve	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000
Transfer to Equipment Replacement	252,000	275,000	126,000	69,000
	\$ 452,000	\$ 475,000	\$ 326,000	\$ 269,000

## **4.0 MONITORING DATA**

### **4.1 Development of the Comprehensive Clackamas County Stormwater Monitoring Plan (CCCSMP)**

To meet the requirements of the 2021 Permit, the Clackamas County Comprehensive Stormwater Monitoring Plan (CCCSMP) was updated and submitted to DEQ in March 2022. Based on a subsequent DEQ permit modification related to monitoring (initiated January 2023), the CCCSMP was updated again and resubmitted to DEQ on May 30, 2023. The new plan was accepted by DEQ on June 7, 2023 and became effective July 1, 2023. The new plan reflects updates to pesticide monitoring frequencies. This is the second annual report (2024/2025) to reflect implementation of the 2023 version of the CCCSMP.

As described in the CCCSMP, the NPDES MS4 stormwater monitoring program requires two components. The first component is program monitoring, which involves tracking and assessment of programmatic activities, as described in the individual permittees SWMP, through the use of performance indicators or metrics. Results of the program monitoring are reported in Appendix A as the annual tracking measures. The second component is environmental monitoring, which includes visual monitoring and the actual collection and analysis of samples. Visual monitoring efforts for the 2024–2025 reporting year included dry weather field screening, as described in the City’s SWMP under the IL-4: “Dry Weather Field Screening” BMP. Results of the visual monitoring efforts are reported in Appendix A under the applicable BMP. Environmental monitoring also consists of instream sample collection and outfall sample collection, and the City’s sampling efforts are outlined in more detail in Sections 4.2 and 4.3 and in the CCCSMP. Results of the instream and outfall sample collection efforts for this reporting year have been submitted to DEQ in the required format as per their request.

### **4.2 CCCSMP Updates and Modifications for the 2024–2025 Reporting Year**

The 2023-2024 reporting year is the second full year implementing the revised 2023 CCCSMP. No changes were made this fiscal year.

### **4.3 Summary of Monitoring Data**

In accordance with the 2023 CCCSMP, Oregon City is required to conduct instream and outfall monitoring. Routine instream monitoring is required at six locations reflecting four tributaries to the Willamette River. Outfall monitoring is required at two outfall locations that discharge to the Clackamas River. Time-weighted composite (during storm events) and single grab samples are taken in accordance with the frequencies outlined in Table 3 below. During the 2023 update of the CCCSMP Outfall locations 6 and 7 were re-labeled as 8 and 9 respectively. Oregon City requested they be changed back to avoid confusion in sampling records, but the change never made it into the final Draft. To maintain consistency with the approved CCCSMP all samples from outfall locations, previously, sites 6 & 7 will now be reported as 8 & 9 respectively.

During the 2024-2025 monitoring year, the City of Oregon City collected all required outfall samples (three events at two sites, 8 & 9) and instream samples (four events at six sites, 10-15). Complete sampling results are submitted to DEQ’s YDO website annually before the 1<sup>st</sup> of December. The sampling results for each reporting year are entered in the format provided by DEQ “Oregon-City\_24-25MS4ContinuousSubmission.xlsx” to simplify the data review process.

**Table 3: 2021–2022 Oregon City Monitoring Locations and Required Frequencies**

Site #	Location	Sample Type	Required Frequency	Routine Sampling
In-Stream Monitoring				
OC010is	Abernethy Creek at 17082 Holly Ln (Holly Ln Bridge)	Grab & Composite	4/year	Dry Weather (2/year) and Wet Weather (2/year)
OC011is	Abernethy Creek at 316 17th St (17th at railroad trestle)	Grab & Composite	4/year	Dry Weather (2/year) and Wet Weather (2/year)
OC012is	Coffee Creek behind 415 S McLoughlin (outfall at Willamette)	Grab & Composite	4/year	Dry Weather (2/year) and Wet Weather (2/year)
OC013is	Park Place Creek behind 13530 Redland Rd	Grab & Composite	4/year	Dry Weather (2/year) and Wet Weather (2/year)
OC014is	Singer Creek at the north end of Singer Creek Park (Linn Ave)	Grab & Composite	4/year	Dry Weather (2/year) and Wet Weather (2/year)
OC015is	Singer Creek 502 7th St (MH - 37138 located on Center St)	Grab & Composite	4/year	Dry Weather (2/year) and Wet Weather (2/year)
Outfall Monitoring				
OC008ofm*	Clackamas River at O.C. Shopping Center	Composite	3/year	Storm Event
OC009ofm*	Clackamas River at Clackamette Cove	Composite	3/year	Storm Event

\* Outfall sites were accidentally renamed during the CCCSMP 2023 update. Locations remain the same and just have new labels.

## 5.0 Overview of Planning and Land Use Changes, UGB Expansions and New Development Activities

### 5.1 Summary of Land-Use Changes and UGB Expansions

The following land use/ zoning changes and/or annexations were approved by the City between July 1, 2024, and June 30, 2025:

- Zone Changes: 1 change to low density residential between 7/1/24-6/30/25
  - 8/10/24 – 2.5 acres, 14389 and 14421 Maplelane Road, Clackamas County Tax Map 3-2E-04C, Tax lots 00300 (1.66 acres) and tax lot 00500 (0.84 acres)
- Annexations: 1 annexation between 7/1/24-6/30/25
  - 8/10/24 – 2.5 acres, 14389 and 14421 Maplelane Road, Clackamas County Tax Map 3-2E-04C, Tax lots 00300 (1.66 acres) and tax lot 00500 (0.84 acres)

### 5.2 Summary of Development Activities within the UGB

During the reporting year 2024 – 2025 (7/1/24-6/30/25), there were 26 development applications (9 were constructed, 3 were permitted in the previous reporting year but are not yet completed and 13 applications are in some phase of design or land use review and approval for compliance with water quality/water quantity standards).

Constructed (which have a stormwater component):

- Maplelane North Apartments
- Harrison Street Apartments

- Serres Farm Subdivision Phase 1
- Chase Bank
- Clackamas County Courthouse
- Pease Tower Vista Cluster Housing
- Holmes Townhome Apartments
- Maplelane South Apartments
- Pleasant Avenue Apartments

Permitted by not yet Constructed (or under construction but not complete):

- Serres Farm Subdivision Phase 2
- Abernethy Hotel
- Metro Modular Building Additions
- In some phase of design by not yet permitted or constructed:
- 421 Warner Cluster Housing
- Thimble Creek Subdivision
- Clackamas Heights Housing Authority Redevelopment
- TriMet Transit Center Reconstruction
- Central Point 4 lot Subdivision
- White Lane Subdivision
- Park Place 53-lot Subdivision
- Park Place II Subdivision
- A Caring Place
- 173 Canemah Subdivision
- Tumwata Village
- Subaru Expansion/Redevelopment
- 1367 Molalla Mixed Use

## **6.0 ADDITIONAL ACTIVITIES**

There was 1 public improvement project (CIP), including a water quality and/or flow control project, for this reporting period. Details of this project can be found in Appendix A, AP-3 An outfall at Barclay Hills Storm Outfall (CI 23-014) was reconstructed, regraded to minimize erosion, and return hydrology back to predevelopment conditions in September 2024.

There were 69 stormwater related meetings and trainings recorded for the 2024-2025 reporting period. Dates, topics, and attendees are summarized below in Table 4 on the next page.

**Table 4: Staff Meetings and Training**

2024-2025

Date/Time	Attendees	BMP's /Topics	Items Discussed	Next Steps/Program
7/9/2024	Marcos Kubow & GOCWC committee	Temperature TMDL	Annual budget and future projects	discuss future grant opportunities with Tom Gaskill.
7/11/2024	Marcos Kubow & Clackamas Co-permittee's	Biological monitoring and Macroinvertebrates	Scope of work and access to sampling locations	Make sure consulting firm has access to monitoring sites in Oregon City.
11-Jul	Marcos, Roy Iwai, & Samantha Pryor	Education and Outreach	Introduce Samantha to Coalition by reviewing history and future goals.	Continue working on coalitions strategic plan.
7/24/2024	Marcos & RCCRS Coalition	Education and Outreach	Review and discuss WES changes to Coalition DEI statement.	Revise DEI statement to address discrepancies.
8/1/2024	Marcos & Mallory Ott	Water Quality monitoring	Inspect Dry weather outfall location for illicit discharge.	Document finding for annual report
8/5/2024	Marcos, John Lewis, and Dayna Web	Water Quality monitoring	Environmental Assessment of Clackamette Cove	Continue implementing monitoring plan and provide updates for public on social media.
8/15/2024	Marcos & Mallory Ott	Water Quality monitoring	Instream monitoring (dry weather)	enter lab results in DEQ format.
8/20/2024	Marcos, Dayna Webb, Vance Walker, Krista Reininga & Eric Hand	MS4 Permit Management Overview	Overview of MS4 Permit responsibilities for the new Public works director.	Follow up with the director on a quarterly basis.

8/22/2024	Marcos & ACWA groundwater committee	ACWA annual report	achievements, next steps, funding, and potential guest speakers	Continue Conversation about Gresham's UIC Permit renewal.
8/23/2024	Marcos, Josh Wheeler, Jude Thadeaus, & Pete Walter	Amendment process of Oregon City Municipal Code (OCMC) 17.47 - Erosion control & construction site	Legislative process, permit requirements, and Ordinance language	Submit Permit, Pay Fees, & conduct readings before the Planning and City Commission's for approval.
9/3/2024	Marcos & Krista Reininga	MS4 Permit & TMDL updates	Legislative language for ordinance, permit renewal orientation, and TMDL mainstream updates and shade gap changes	Submit Permit, Pay Fees, & conduct readings before the Planning and City Commission's for approval. Keep abreast of TMDL changes and implementation timeline.
9/5/2024	Marcos & ACWA Water Quality Committee	Permit and TMDL requirements	WILLAMETTE MAINSTEM TEMPERATURE TMDL DISCUSSION	Continue to ask for clarification on shade gap changes and area measured to DEQ.
9/9/2024	Marcos & Josh Wheeler	OCMC 17.47 Amendment	Review and discuss narrative for staff report to Planning commission	revise staff report and incorporate definitions for construction site waste and construction runoff, among
9/9/2024	Marcos & Clackamas Co-Permittees	Mercury TMDL	Review and Discuss Mercury monitoring IGA.	Request for approval from Public Works Director.
9/10/2024	Marcos & ACWA E&O committee	Education and Outreach	Annual report, Future topics, and potential for guest speakers	Consider topic for future meetings
9/11/2024	Marcos & Regional Spill Committee	IDDE	Order of operations for spill response, Point of Contacts, & Case study	Update contacts and SOP
9/11/2024	Marcos & ACWA Stormwater Committee	Temperature TMDL	DEQ presents update on Willamette Subbasins and Willamette Mainstem and Major Tributaries amendment to the	Keep abreast of TMDL changes and implementation timeline.

9/17/2024	Marcos & Tom Gaskill	Temperature TMDL	Current project status & future potential project sites	Follow up on funding discussion.
9/18/2024	Marcos & EPA	IDDE	Assessing Community Vulnerabilities to Potential Contaminant Releases from Extreme Events	Assess local Industrial for extreme weather event contamination potential.
9/26/2024	Marcos, Jayson, Captain Evans, Oregon City High	IDDE	Location of parade vicinity to catch basins, Action plan for storm event, potential for stormwater contamination	Ensure Street sweeper runs the course of the parade to collect any potential debris.
10/1/2024	Marcos & Krista Reininga	Construction waste & IDDE	Review amendments for OCMC 8.08 and OCMC 17.47	Make necessary adjustment to ordinances to comply with permit requirements.
10/2/2024	Marcos, Operation management, & Planning	Temperature TMDL	Review Tree City USA (TCUSA) application process and requirements.	Work with Operations management to incorporate TCUSA Data into Temperature
10/3/2024	Marcos, Jayson, Captain Evans, McLaughlin Neighborhood Asso. Chair President	IDDE	Location of Trick-or-treat event vicinity to catch basins, Action plan for storm event, potential for stormwater contamination	Ensure Street sweeper runs the course of the event space to collect any potential debris.
10/7/2024	Marcos, Metro management, Operations	Post-construction run-off	Retroactive Maintenance Agreement for water quality facility located at South Metro Transfer Station.	Continue to workout easement boundaries and jurisdictional responsibilities.
10/9/2024	Marcos, ACWA Stormwater Committee	WQ Monitoring, Phase 2 permit renewal, EPA Aquatic life Criteria	Sampling 101, Post-construction language for permit, Aquatic Life Criteria	provide comments for DEQ letter, Save new criteria in records
10/15/2024	Marcos & Heidi Blackwell	Education and Outreach	Future Tabling events a Education opportunities	Be available vegetative stormwater facility management course



10/15/2024	Marcos & KPTV E&O group	Education and Outreach	Social Media water quality PSAs	Finalize last 5 topics for stake holders approval.
10/23/2024	Marcos & RCCRS Coalition	Education and Outreach	Rebuild River Starts Here brand and website	Define audience, brand, mission, & website.
10/28/2024	Marcos & Planning Commission	Construction waste	Present amendments to OCMC 17.47 in first reading for the planning commission	Second reading & recommend for approval for city commission.
10/29/2024	Marcos, Jarrod Lyman, & Karissa Fischer	Education and Outreach	Develop landing page with hyperlinks of third party E&O sources.	provide links and dates for WQ content in monthly E-trail news.
10/30/2024	Marcos, Bonny Cushman, Eryn Wecker	Education and Outreach	Convene with social media subcommittee and divide work responsibilities	Take lead and meet with KPTV to discuss schedule for the rest of the fiscal year.
11/6/2024	Marcos & City Commission	IDDE	First reading of OCMC 8.08 amendments to define allowable non-stormwater discharge	Prepare for second reading and approval.
11/7/2024	Marcos & ACWA Water Quality Committee	Water Quality	PFAS, aquatic life criteria, TSCA, Temp TMDL, Funding	Document pertinent information and make any necessary adjustments to
11/12/2024	Marcos & ACWA Education Committee	Temperature TMDL	Emerald Ash Borer (EAB) know range and BMPs for preventing spread	Develop click bait for public on EAB.

11/13/2024	Marcos & ACWA Stormwater Committee	FEMA Bi-op Overview, ODOT testing treatment center, Phase 2 permit update.	What FEMA is expecting, Capabilities of testing center & budgeting options, Changes in permit language	Share FEMA overview with OPS Director, keep notes on Testing center and share with management.
11/14/2024	Marcos & Clackamas Co-Permittees	WES' DEQ inspection recap, Macroinvertebrate survey update.	DEQ provided questions before hand, inspection was professional and honest, WES receive praise for Job well done. Field work is complete and discussed what we want highlighted in the report	Ensure Oregon City is prepared for an inspection and relay information to superiors. Wait for report and document in annual write up for DEQ.
11/20/2024	Marcos & Mallory Ott	Water Quality monitoring	Collect instream samples and deliver to Lab	Wait for results and report in annual write up.
12/3/2024	Marcos & Krista Reininga	Permit renewal package and budget	review expected expenses for permit renewal package assistance.	Alert GIS of data needed for Load modeling and share assistance budget with Director.
12/5/2024	Marcos Kubow	Water Quality	Completed Pesticide Safety and Regulation Exam	Prepare for Right of way exam in January.
12/5/2024	Marcos & ACWA Water Quality Committee	Legislative Priorities, Permitting Schedule, DEQs Triennial review,	PFAS is #1 priority, DEQ has provided their schedule, Still unsure when DEQ will finalize TMDL	Expect membership increase, wait to hear on ruling for PFAS.
12/16/2024	Marcos & RCCRS Coalition	Education and Outreach	Website re-design	Develop Bran for river starts here.

12/17/2024	Marcos & Mark Rosenkranz	Water Quality monitoring	Collect Stormwater samples and deliver to Lab	Wait for results and report in annual write up.
1/8/2025	Marcos & ACWA Stormwater Committee	Permit compliance	GSI assistance Program guide book, Phase 2 permit renewal process, 1200 permits	review GSI guide and provide feedback.
1/9/2025	Marcos, Chris Dunlop, & Krista Reininga	Permit renewal package	Land use Maps, BMP ranking, & drainage areas.	Continue working with Chris to provide all necessary GIS Data
1/21/2025	Marcos, Chris Dunlop, & Krista Reininga	Permit renewal package	Wet pond v. dry pond, infiltration v. filtration, & swale v. rain garden; ground truthing BMPs and defining design	Review aerials of BMPS in question and confirm design specs.
1/22/2025	Marcos & RCCRS Coalition	Education and Outreach	Strategic plan and mission statement	update mission statement and strategic plan
1/23/2025	Clackamas Co-permittee members	Permit compliance	Permit renewal, shared costs, Mercury monitoring, Macroinvertebrate study	Collaborate with co-permittees to cost-share trends analysis
2/6/2025	ACWA Water Quality committee	Permit compliance	PFAS reg updates, 6-ppd, Permit renewal, & TMDL IP	register for ACWA stormwater Summit
2/13/2025	Marcos & Mallory Ott	Water Quality monitoring	Instream monitoring (wet weather)	record results when submitted by lab.

2/19/2025	Marcos & Mallory Ott	Water Quality monitoring	Outfall monitoring	record results when submitted by lab.
3/6/2025	ACWA Water Quality committee	Permit compliance	PFAS reg updates, 6-ppd, Permit issuance Plan (PIP), Permit renewal, & TMDL IP	Review City of Molalla's Permit
3/11/2025	Marcos and GOCWC board	Temperature TMDL	Budget approval, new part time employee, and employee handbook development	Begin discussion on new 2-year contract
3/13/2025	Marcos & Mallory Ott	Water Quality monitoring	Outfall monitoring	record results when submitted by lab.
3/18/2025	Marcos & Mallory Ott	Celebrating Clean Water Event (CCWET)	Spoke to almost 500 students about water quality and distribute E&O swag	Come up with more engaging teaching aid for tabling at next year's CCWET
3/26/2025	Marcos & RCCRS Coalition	Education and Outreach	Website re-design & group mergers	Consider the pros and cons of merging CRC, RCCRS, & CWIOF
4/3/2025	ACWA Water Quality committee	Permit compliance	DEQ discusses monitoring & pH calibration, permit fee increases, DEQs WQ integrated report	share compliance updates with city management.
4/16/2025	Marcos & James Graham	Water Quality (WQ) monitoring	Cove WQ assessment contract renewal	Confirm all invoices are submitted and close out account to renew contract
4/22/2025	Marcos, Chris Dunlop, Josh Wheeler & Krista Reininga	Permit renewal package	anticipated future BMP installations.	Continue working with Chris to provide all necessary GIS Data

4/23/2025	Marcos & RCCRS Coalition	Education and Outreach	EnviroIssues v. Parachute strategies as contractor for website rebuild	Collaborate with fellow members on vision and content of new website
4/29/2025	Marcos & Mallory Ott	Children's Clean Water Festival (CCWF)	Spoke to over 500 students about water quality and distribute E&O swag	Come up with more engaging teaching aid for tabling at next year's CCWF
5/5/2025	Marcos & Phase 1 permit renewal workgroup	Permit renewal	Permit renewal, shared costs, Understanding PLRE, Benchmarks, & trends analysis	Collaborate with co-permittees to cost-share trends analysis
5/9/2025	Marcos & Mallory Ott	Water Quality monitoring	Instream monitoring (wet weather)	record results when submitted by lab.
5/13/2025	Marcos and GOCWC board members	Temperature TMDL	Federal funding concerns, restoration project on the schedule for the next 2 years	Approve scope of work and have the OCPW Director sign for the contract
5/14/2025	Marcos & Audrey Meeker	Water Quality monitoring	Develop request for proposals (RFP) for Phase 2 of the project	Finalize RFP
5/21/2025	Marcos & ACWA members	ACWA annual Stormwater Summit	Federal cut-backs, Pervious Pavement, Tree wells, & Tree cover mapping	Continue researching pervious pavement and Tree wells
5/29/2025	Marcos & ACWA groundwater committee	Permit compliance	Stormwater Summit reflections, PFAS and septic systems, UIC permit	Consider topics for the 2026 Stormwater Summit
6/2/2025	Marcos & Phase 1 permit renewal workgroup	Permit renewal	Permit renewal, shared costs, Understanding PLRE, Benchmarks, & trends analysis	Collaborate with co-permittees to cost-share trends analysis

6/17/2025	Clackamas Co-permittee members	Water Quality monitoring	Results of study and suggested alternative to improve stream health	Wait for final report and incorporate into MS4 annual report
6/18/2025	Marcos Kubow	Managing Stormwater in Oregon	How Federal Gov will affect stormwater management, Housing crisis and WQF, BMP case studies	Consider Parametrix as a future consultant

# **Appendix A**

## **Oregon City SWMP Implementation Status**

Key to Pollutant Symbols: A full circle (●) indicates the BMP is expected to address the parameter. An empty circle (○) indicates the BMP may be expected to address the parameter. A blank cell indicates that the effect of the BMP is unknown at this time or that the BMP is more administrative in nature and does not have an effect on pollutant removal.

Appendix A. Status of Implementing Components of Oregon City’s 2022 Stormwater Management Plan (SWMP)

BMP or activity	Addresses bacteria?	Addresses mercury?	Responsible department	Measurable goals (2022 SWMP)	Tracking measures (2022 SWMP)	Annual report information: tracking measure status, Permit year 2024– 2025	Additional detail related to activities conducted
Category A. Education and Outreach BMPs							
BMP EO-1: Education and Outreach Program	○	○	OCPW	<ul style="list-style-type: none"><li>• Include a water quality related article in each City newsletter, distributed to citizens three times per year.</li><li>• Periodically install signs near water quality structures and around the City promoting water quality.</li><li>• Seek out opportunities to partner with other agencies/jurisdictions/organizations to educate and promote watershed health and low impact development.</li><li>• Distribute an annual water quality report to Oregon City residents including stormwater educational information.</li><li>• Target outreach efforts to encourage pet waste clean-up at City parks and recreational areas.</li></ul>	<p>1) Track the number, types, and topics of public educational materials distributed to the public annually.</p> <p>2) Report any large-scale public educational campaigns initiated during a given year.</p> <p>3) Track coordinated public outreach activities with other permittees.</p>	<p>1) The following educational activities were conducted (see Appendix B for details):</p> <ul style="list-style-type: none"><li>• A total of eight water quality-related articles were included in Trail News.</li><li>• OC participated in two special events, <i>Celebrating Clean Water Event</i> at Clackamas County Community College 03/18 &amp; 19/2025, and <i>Children’s Clean Water Festival</i>, at Portland community college - 4/29/25.</li><li>• The October 2024 utility bill included a message Only Rain Down the Drain.</li><li>• Mailed 15,907 postcards announcing availability of the Annual Water Quality Report on OC’s website.</li><li>• Stormwater Banner Display at City Hall – 9/23/2024-10/07/2024, Pioneer Center - 10/07/2024-10/21/2024, &amp; Operations building 10/21/2024 – 11/4/2024</li><li>• Continued participation in regional Stormdrain Cleaning Assistance Program (SCAP) in 2024-2025 permit year.</li></ul> <p>3) Coordinated efforts included:</p> <ul style="list-style-type: none"><li>• Continued to sponsor the “Clean Water, It’s Our Future” campaign via KPTV media outlets.</li><li>• Continued participation in the Coalition for Clean Rivers and Streams</li><li>• Continued participation with other agencies to promote water quality education through Clackamas River Water Providers</li><li>• Continued participation with Greater Oregon City Watershed Council</li><li>• Continued participation with Clackamas County Water Education Team</li><li>• Continued participation with Clackamas Community College Environmental Learning Center Advisory Team</li><li>• OC’s sponsorship to the Environmental Learning Center at Clackamas Community College supports the following programs:<ul style="list-style-type: none"><li>-Water industry career event - middle school &amp; high school</li><li>-Watershed Health Field Trips to Environmental Learning Center – for 4<sup>th</sup> Graders in Oregon City School District</li><li>- Wildlife and Water Friendly Gardens</li><li>-Sponsor for Vegetated Stormwater Facilities – continuing education for adults</li></ul></li></ul> <p>Continued to sponsor the Down the River Clean Up event</p>	
BMP EO-2:	○	○	OCPW	<ul style="list-style-type: none"><li>• Provide one presentation annually to Oregon City Council at a council meeting, work session, or planning retreat.</li></ul>	<p>1) Track the dates of presentations.</p>	City Council meeting Completed 11/06/2024	



Appendix A. Status of Implementing Components of Oregon City's 2022 Stormwater Management Plan (SWMP)							
BMP or activity	Addresses bacteria?	Addresses mercury?	Responsible department	Measurable goals (2022 SWMP)	Tracking measures (2022 SWMP)	Annual report information: tracking measure status, Permit year 2024– 2025	Additional detail related to activities conducted
Outreach to Elected Officials				<ul style="list-style-type: none"><li>Provide one presentation annually to Oregon City Planning Commission.</li></ul>		Planning Commission meeting Completed 10/28/2024	
BMP EO-3: Translate Stormwater Program Materials	<div><div></div></div>	<div><div></div></div>	OCPW and Parks	<ul style="list-style-type: none"><li>Translate one stormwater educational material into Spanish each year.</li></ul>	1) Track the number and type of materials translated.	Completed 02/26/2024 Three infographics were translated this year and are available on Oregon city's website: <ul style="list-style-type: none"><li>Do You Scoop the Poop?<ul style="list-style-type: none"><li><a href="#">Spanish</a></li><li><a href="#">English</a></li></ul></li><li>Landscape Management<ul style="list-style-type: none"><li><a href="#">Spanish</a></li></ul></li><li>Moss Removal<ul style="list-style-type: none"><li><a href="#">Spanish</a></li><li><a href="#">English</a></li></ul></li></ul>	
BMP EO-4: Catch Basin Marking	<div><div></div></div>	<div><div></div></div>		<ul style="list-style-type: none"><li>Install decals at newly constructed public catch basins.</li><li>Install decals at catch basins when decals are found to be faded, detached, or deteriorated.</li></ul>	1) Continue to add decals as necessary.		
Category B. Public Involvement and Participation BMPs							
BMP PI-1: Stormwater Program Website	<div><div></div></div>	<div><div></div></div>		<ul style="list-style-type: none"><li>Update information on website in 2023.</li><li>Conduct an annual website review to check for accuracy, working links, staff changes, new documents and policy updates.</li></ul>	1) Track completion of annual website review checklist.	1) Oregon City's NPDES Library webpage is reviewed and updated annually every March after documents have been submitted and approved.	
BMP PI-2: Sponsored Community Stewardship Opportunity	<div><div></div></div>	<div><div></div></div>		<ul style="list-style-type: none"><li>Sponsor at least one stewardship opportunity with the Coalition during the permit term.</li></ul>	1) Provide a summary of the stewardship activities conducted with the Coalition.	1) Updated mission statement to be more inclusive using supportive DEI language. Launched a Lawn Campaign with an intervention for pesticide use in lawncare. Updated websites for a broader outreach.	
Category C. Illicit Discharge Detection and Elimination							
BMP IL-1: MS4 Mapping				<ul style="list-style-type: none"><li>Create tracking system for illicit discharges and identified dry weather flows to track repeat illicit discharges over time in the MS4 map.</li><li>Add municipal stormwater management facilities and privately owned stormwater management facilities to GIS database within one year of construction completion.</li></ul>	1) Track the number of municipal stormwater management facilities in the digital GIS inventory.  2) Track the number of privately owned stormwater management facilities in the digital GIS inventory.	1) Municipal Count <ul style="list-style-type: none"><li>Pond_____96</li><li>Rain Garden_____11</li><li>Roadside Planter_____203</li><li>Soaker Trench Infiltrator___2</li><li>Swale_____76</li><li><b>f. TOTAL_____388</b></li></ul> 2) Private Count <ul style="list-style-type: none"><li>Pond_____57</li><li>Rain Garden_____90</li><li>Roadside Planter _____20</li><li>Soaker Trench Infiltrator __23</li><li>Swale _____62</li><li><b>f. TOTAL _____252</b></li></ul>	
BMP IL-2: IDDE Ordinance	<div><div></div></div>	<div><div></div></div>		<ul style="list-style-type: none"><li>Review OCMC enforcement code and identify changes (if needed) to implement escalating enforcement actions.</li><li>Propose and adopt an IDDE ordinance to update OCMC 8.08 and the enforcement code that is consistent with the prohibitions and allowable discharges listed in Schedule A.1.d.</li></ul>	1) Track progress on ordinance review and update.	1) OCMC 8.08 was amended and approved by City Council on 11/22/2024.	

Appendix A. Status of Implementing Components of Oregon City's 2022 Stormwater Management Plan (SWMP)							
BMP or activity	Addresses bacteria?	Addresses mercury?	Responsible department	Measurable goals (2022 SWMP)	Tracking measures (2022 SWMP)	Annual report information: tracking measure status, Permit year 2024– 2025	Additional detail related to activities conducted
BMP IL-3: IDDE Program and Enforcement	○	○	Oregon City Public Works Department (OCPW)	<ul style="list-style-type: none"> <li>Operate spill reporting hotline and document calls received.</li> <li>Review, update, and implement updated Standard Operating Procedures (SOPs) for the (IDDE) Program for new permit requirements.</li> <li>Respond to all illicit discharge reports within the permit specified timeframes.</li> <li>Follow enforcement procedures for confirmed illicit discharges.</li> </ul>	1) Track the status of documenting and updating the IDDE SOP. 2) Track the number of calls to spill reporting hotline. 3) Track the number, location, type of discharge, resolution, and enforcement action for any illicit discharge investigation conducted.	1) The IDDE SOP was updated on 12/01/2023 2) Zero Calls were made to OCs afterhours on-call Staff. 3) No illicit discharge investigations were deemed necessary during this reporting period.	a.
BMP IL-4: Dry Weather Field Screening	○	○	OCPW	<ul style="list-style-type: none"> <li>Review and update dry weather field screening prioritization criteria and identify a new list of priority screening sites by December 1, 2023.</li> </ul>	1) Track the number and location of outfalls inspected annually. 2) Summarize inspection results and track the number and location of outfalls requiring monitoring and/or investigations. 3) Report the outcome and resolution of any investigation activities. 4) Report the outcome and resolution of any code enforcement actions. 5) Track the status of updating standard procedures.	1) Nine outfalls were inspected as part of annual dry weather field screening activities. 2) All Outfall inspections were completed by 8/1/2024. Flow was observed at 1 of the outfalls; discharge was moderate and characterized as permissible. 3) N/A 4) N/A	1) Dry weather screening was conducted at the following outfalls: <ol style="list-style-type: none"> <li>99E and 6th Street (manhole 33556): 12-inch</li> <li>427 Main Street (manhole 33558): 15-inch</li> <li>Abernethy Road at Tri-Lett: 15-inch</li> <li>Clackamas River Drive: 48-inch</li> <li>Metro Wetlands Pond: 48-inch</li> <li>Falcon Drive: 30-inch</li> <li>Berry Hill: 24-inch</li> <li>Beavercreek at Hwy 213: 24-inch</li> <li>Behind 1651 Beavercreek Road: 48-inch</li> </ol>
BMP IL-5: Spill Response Program	○	○	Clackamas Fire District #1 (Hazardous Materials Team) and OCPW	<ul style="list-style-type: none"> <li>Investigate all spills and respond as necessary.</li> <li>Report all qualifying spills to DEQ.</li> </ul>	1) Track the number of spills reported to OCPW and DEQ. 2) Track the responses to reported spills. 3) Track the sources, causes, and types of discharges resulting from spill activities. 4) Track any changes to the OC <i>Spill Response Plan</i> .	1) 3 spills were reported to OCPW during the 2024-2025 reporting period. 2) Responses were appropriate for each spill. See list below. 3) One spill required DEQ reporting. These spills were from various causes, vehicle accidents, mechanical failure, illegal dumping & ice storm. <ul style="list-style-type: none"> <li>9/16/24: 691 Molalla Av. SSO private pump station failed OERS notified #2024-2447 the owners fixed the problem and started routine maintenance</li> <li>1/7/25: 16294 Hunter Av. SSO construction debris blocking pipe causing approximately 2,400 gallons of sewage to overflow into the stream OERS notified #2025-0071</li> <li>3/11/25: 15880 Swan Av. Garbage truck dumped a burning load of garbage on street, and the fire suppression water entered a nearby catch basin OERS report #2025-0632</li> </ul> 4) Spill Response Plan was reviewed, verified, and any outdated contacts have been updated.	

Appendix A. Status of Implementing Components of Oregon City's 2022 Stormwater Management Plan (SWMP)							
BMP or activity	Addresses bacteria?	Addresses mercury?	Responsible department	Measurable goals (2022 SWMP)	Tracking measures (2022 SWMP)	Annual report information: tracking measure status, Permit year 2024– 2025	Additional detail related to activities conducted
Category D. Construction Site Runoff Control							
BMP EC-1: Erosion Control Ordinances	●	●	OCPW	<ul style="list-style-type: none"> <li>Review OCMC 17.47 to determine if any updates are needed.</li> <li>Propose and adopt EPSC code updates, if needed.</li> </ul>	1) Track the status of reviewing and updating (if necessary) the EPSC related municipal code sections.	1) OCMC 17.47 has been updated and approved by the City commission on December 4 <sup>th</sup> . Updates were focused on addressing construction site wastes in addition to sediment control	
BMP EC-2: Erosion Prevention and Sediment Control Manual	●	●	OCPW	<ul style="list-style-type: none"> <li>Adopt the updated Clackamas County EPSC manual with City-specific addendum.</li> </ul>	1) Track the status on updates to the EPSC Manual.	1) The manual and addendum were adopted by the City Commission on May 20, 2015, through Resolution No. 15-14. No updates were made in this reporting period.	
BMP EC-3: Plan Review and Permitting	●	●	OCPW	<ul style="list-style-type: none"> <li>Develop EPSC Plan Review checklist and post it to the SWMP document library.</li> <li>Review erosion control plans for all developments with greater than 1,000 square feet of land disturbance area for compliance with EPSC requirements.</li> <li>Refer applicable sites to DEQ 1200-C permitting process.</li> </ul>	1) Track the status on development of EPSC plan review checklist. 2) Track the number applications submitted, reviewed, and approved for construction. 3) Track the number of sites referred for 1200-C permitting process. 4) Track the number of erosion control permits issued annually.	1) Updated March 2024 2) 34 total applications, 11 non-single family, and 28 single family. 3) 2 sites referred for 1200-C permitting. 4) 34 erosion control permits were issued.	
BMP EC-4: Education for Construction Site Operators	●	●		<ul style="list-style-type: none"> <li>Continue to provide OC's most currently adopted erosion control manual on the OC website.</li> <li>Continue to offer discounts on erosion control permits to contractors completing erosion control certification programs.</li> </ul>	1) Track the number of contractors receiving a discount on erosion control permit fees.	ODOT I-205 project was the only developer that received a permit discount.	
BMP EC-5: Erosion Control Inspections	●	●		<ul style="list-style-type: none"> <li>Conduct a minimum of three erosion control inspections at each permitted site.</li> <li>Conduct appropriate enforcement activities for erosion control violations.</li> <li>Update and post the EPSC Site inspection protocol to the SWMP document library.</li> </ul>	1) Track the status of updating the EPSC Site Inspection Protocol. 2) Track the number of erosion control inspections conducted annually. 3) Track the number of notices of non-compliance issued during inspections.	1) Updated November 2023. 2) 3 inspections per site 103 total inspections. 3) 1 notice of non-compliance.	
EC-6: Enforcement	●	●		<ul style="list-style-type: none"> <li>Develop/update EPSC Enforcement SOP.</li> <li>Issue notice of violations and appropriate penalties for non-compliant construction sites.</li> </ul>	1) Track the number of violations, follow-up inspections, and enforcement actions. 2) Track the outcome of enforcement actions.	1) 1 total notices, 0 notices of non-compliance, & 0 stop work orders. 2) All issues were resolved when Notice was issued.	

Appendix A. Status of Implementing Components of Oregon City's 2022 Stormwater Management Plan (SWMP)							
BMP or activity	Addresses bacteria?	Addresses mercury?	Responsible department	Measurable goals (2022 SWMP)	Tracking measures (2022 SWMP)	Annual report information: tracking measure status, Permit year 2024– 2025	Additional detail related to activities conducted
Category E. Post-Construction Site Runoff							
BMP PC-1: Stormwater Code Review	○	○	OC Community Development	<ul style="list-style-type: none"> <li>Review OC's current/planned stormwater treatment and detention standards for compliance with new NPDES MS4 permit language. Prepare a technical review memo to document findings.</li> <li>If needed, modify code and SWGDS to include additional water quality offset programs.</li> </ul>	1) Track the status of developing the technical review memo. 2) Track any code/standards modifications made by ordinance.	1) Brown and Caldwell conducted a detailed review of the Oregon City Municipal Code (OMC) ( <i>revised January 31, 2023</i> ) Chapter 13.12–Stormwater Management, Chapter 17.47 Erosion and Sediment Control, and Chapter 1.20.090–Fines, as well as Oregon City's Stormwater and Grading Design Standards (March 2020), to confirm documentation for each of the five major areas of compliance: <ul style="list-style-type: none"> <li>Repeat violations</li> <li>Timelines for compliance</li> <li>Escalating enforcement</li> <li>Severity of the discharge</li> <li>Penalties and cost recovery</li> </ul> 2) As a result of the review, an enforcement SOP was developed for the construction program, code modifications are being finalized related to SWGDS, and a fee in lieu policy is being finalized. The City's SWGDS were found to be in good shape with respect to meeting the numerical stormwater retention performance standards in the permit.	
BMP PC-2: Low Impact Development Code Review	●	●		<ul style="list-style-type: none"> <li>Conduct LID Development Code Review and document findings in a technical review memo.</li> </ul>	1) Track the status of the LID Development Code Review technical memo.	Completed 10/19/2023	
BMP PC-3: Post-Construction Plan Review and Permitting	●	●		<ul style="list-style-type: none"> <li>Review all new development and applicable redevelopment for conformance with current city stormwater standards and ordinances.</li> <li>Continue to enforce stormwater management standards in the OCMC and SWGDS.</li> </ul>	1) Number of development applications reviewed and approved for compliance with stormwater regulations. 2) Number, type, and drainage area of treatment facilities constructed annually.	1) During the reporting year 2024 – 2025 (7/1/24-6/30/25), 9 applications were reviewed in land use for stormwater compliance, there were <b>25</b> development applications ( <b>9</b> were constructed and placed in operation, <b>3</b> were permitted in the previous reporting year but are not yet in operation and <b>13</b> applications are in some phase of design or land use review and approval for compliance with water quality/water quantity standards. 2) Constructed and in Operation (which has a stormwater component): <ul style="list-style-type: none"> <li>Maplelane North Apartments</li> <li>Harrison Street Apartments</li> <li>Serres Farm Subdivision Phase 1</li> <li>Chase Bank</li> <li>Clackamas County Courthouse</li> <li>Pease Tower Vista Cluster Housing</li> <li>Holmes Townhome Apartments</li> <li>Maplelane South Apartments</li> <li>Pleasant Avenue Apartments</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
BMP PC-4: Private Facility Maintenance	●	●		<ul style="list-style-type: none"> <li>Require new private stormwater facilities to submit maintenance agreements to OC.</li> </ul>	1) Track the number of maintenance	1) 11 developments have fallen out of the 2-year warranty and have been issued maintenance agreements for this reporting year (30 June 2024 to July 1 2025).	24/25 warranty expiration <ul style="list-style-type: none"> <li>PR-135-2019 – Rowland Clearwater</li> <li>PR-174-2020 – Hiram Cluster</li> </ul>

Appendix A. Status of Implementing Components of Oregon City’s 2022 Stormwater Management Plan (SWMP)

BMP or activity	Addresses bacteria?	Addresses mercury?	Responsible department	Measurable goals (2022 SWMP)	Tracking measures (2022 SWMP)	Annual report information: tracking measure status, Permit year 2024– 2025	Additional detail related to activities conducted			
				<ul style="list-style-type: none"><li>Add all newly constructed private stormwater management facilities to the digital inventory with links to maintenance agreements.</li><li>Mail annual maintenance reminders to inventoried private facility owners.</li><li>Conduct annual inspections of 20 percent of private stormwater management facilities and send follow-up letters to private owners about required maintenance.</li></ul>	<p>agreements submitted to OC each year.</p> <p>2) Track the number of private stormwater management facilities in the digital inventory.</p> <p>3) Track the number of maintenance reminder letters mailed and returned each year.</p> <p>4) Track the number of private facility maintenance inspections performed each year.</p>	<p>2) 38 PWQFs with Maintenance agreements</p> <p>3) Facilities w/o Maintenance agreements were sent educational materials on their specific facilities and are currently being visually inspected, photographed, and documented for site prioritization. For facilities with maintenance agreements 38 initial letters were sent.</p> <p>4) 10 Facilities with maintenance agreements were inspected.</p>	<ul style="list-style-type: none"><li>PR-139-2019 – Gardiner Middle School</li><li>PR-161-2020 – Advantis Credit Union PI-20-00060</li><li>SP-18-125 – Harley Ave apts PI-18-000123</li><li>TP-18-02 – Edward Oaks</li><li>TP-17-08 – Mireles Caldera</li><li>PR 150-2019 – 950 South End PI-20-00008</li><li>PR-151-2020 – Willamette Providence East PI-20-00016</li><li>PR-148-2019 – Beavercreek N Campus PI-20-00046</li><li>PR-98-2018 – OC Christian Church</li></ul>			
BMP PC-5: Public Facility Maintenance	●	●	OC Community Development	<ul style="list-style-type: none"><li>Inspect 25% of public stormwater management facilities annually to identify maintenance needs.</li><li>Maintain public structural control facilities in accordance with documented frequencies and procedures.</li><li>Update the public structural control facility inventory as needed.</li></ul>	<p>1) Track the number of public stormwater management facilities in the digital inventory.</p> <p>2) Track the number of public structural facilities inspected and maintained.</p>	<p>3) Municipal Count</p> <p>a. Pond_____96</p> <p>b. Rain Garden _____11</p> <p>c. Roadside Planter_____203</p> <p>d. Soaker Trench Infiltrator____2</p> <p>e. Swale_____76</p> <p>f. <b>TOTAL_____388</b></p> <p>4) All 388 (100%) publicly owned (municipal) water quality facilities were inspected and maintained this fiscal year.</p>				
Category F. Pollution Prevention for Municipal Operations										
BMP OM-1: Catch Basin Maintenance	●	●	OCPW	<ul style="list-style-type: none"><li>Inspect at least 33% of the public catch basins annually.</li><li>Schedule the repair, and replacement of catch basins as needed, based on inspections.</li><li>Update the stormwater system map when discrepancies are found.</li></ul>	<p>1) Track the percentage of total public catch basins inspected and/or maintained annually.</p> <p>2) Track the number of catch basin replacements annually.</p> <p>3) Track the number of public catch basins in OC’s catch basin inventory.</p>	<p>1) 43% (1,800) of catch basins inspected and/or maintained</p> <p>2) 0 CBs replaced by WW/STM Divisions.</p> <p>3) 4,349 CBs</p>				
BMP OM-2: Municipal Operations SOP	○	○	OCPW and Parks	<ul style="list-style-type: none"><li>Complete SOP development and implementation.</li></ul>	<p>1) Track the status of development and implementation of the updated SOP.</p>	<p>1) The Municipal Stormwater Pollution Prevention System (SWPPS) SOP was originally produced in 2013. The SWPPS manual was updated in 2017, 2021, &amp; 2024 to address operational modifications to each facility to ensure all potential pollution sources are monitored for best practices.</p>				
BMP OM-3: Winter Road Maintenance	○	○	OCPW	<ul style="list-style-type: none"><li>Continue current deicing operations to prevent stormwater pollution.</li><li>Continue to research potential cost-effective reuse opportunities for deicing sand materials.</li><li>Complete SOP development and implementation.</li></ul>	<p>1) Track dates of annual inspections and training related to deicing.</p> <p>2) Track deicing quantities applied annually including number of events</p>	<p>1) 11/13 and 11/15 calibration of equipment and in-house training.</p> <p>2) See volumes and dates in the next column.</p>	<div><div>Street</div><div>Gallons used</div><div>Gal./lane mile</div><div>Date</div></div> <div><div>Beavercreek Road</div><div>12</div><div>20</div><div>11/27/2024</div></div> <div><div>Molalla Ave</div><div>12</div><div>20</div><div>11/27/2024</div></div> <div><div>Warner Milne</div><div>9</div><div>20</div><div>11/27/2024</div></div> <div><div>Warner Parrot Road</div><div>9</div><div>20</div><div>11/27/2024</div></div>			

Appendix A. Status of Implementing Components of Oregon City's 2022 Stormwater Management Plan (SWMP)									
BMP or activity	Addresses bacteria?	Addresses mercury?	Responsible department	Measurable goals (2022 SWMP)	Tracking measures (2022 SWMP)	Annual report information: tracking measure status, Permit year 2024– 2025	Additional detail related to activities conducted		
					and general locations.		Linn Ave	12	20 11/27/2024
							5th st	6	20 11/27/2024
							Center St	6	20 11/27/2024
							South 2nd st	5	20 11/27/2024
							Tumwater Dr.	4	20 11/27/2024
							South End Road	9	20 11/27/2024
							Ganong St	5	20 11/27/2024
							Sunset St	6	20 11/27/2024
							Washington St	9	20 11/27/2024
							12th st	5	20 11/27/2024
							15th st	9	20 11/27/2024
							Holcomb Blvd.	12	20 11/27/2024
							Anchor way	9	20 11/27/2024
							Singer Hill rd	6	20 11/27/2024
							Pearl st	9	20 11/27/2024
							Division St	6	20 11/27/2024
							4th St	5	20 11/27/2024
							Oak st	5	20 11/27/2024
							Hazel St	5	20 11/27/2024
							Eluria st	5	20 11/27/2024
							Barclay Hills Dr.	12	20 11/27/2024
							Newell crest Dr.	9	20 11/27/2024
							Duane St	9	20 11/27/2024
							Jason Lee Way	9	20 11/27/2024
							Chickaree Dr	9	20 11/27/2024
							Peter Skeen Way	12	20 11/27/2024
							Magnolia st	5	20 11/27/2024
							Cascade st	5	20 11/27/2024
							Oaktree Terr	12	20 11/27/2024
							Oak Valley Dr.	9	20 11/27/2024
							Warner Milne	9	20 1/13/2025
							Warner Parrot Road	10	20 1/13/2025
							South End rd	12	20 1/13/2025
							2nd st	5	20 1/13/2025
							Center St	7	20 1/13/2025
							Central point rd	12	20 1/13/2025
							Linn Ave	7	20 1/13/2025
							Leland rd	8	20 1/13/2025
							Meyers Rd.	10	20 1/13/2025



Appendix A. Status of Implementing Components of Oregon City's 2022 Stormwater Management Plan (SWMP)									
BMP or activity	Addresses bacteria?	Addresses mercury?	Responsible department	Measurable goals (2022 SWMP)	Tracking measures (2022 SWMP)	Annual report information: tracking measure status, Permit year 2024– 2025	Additional detail related to activities conducted		
							Partlow rd.	9	20 1/13/2025
							5th st.	15	20 1/13/2025
							Eluria st	8	20 1/13/2025
							Molalla Ave	10	20 1/13/2025
							Peter Skeen Way	10	20 1/13/2025
							Pearl st	9	20 1/13/2025
							Anchor way	5	20 1/15/2025
							Holcomb Blvd.	46	20 1/15/2025
							Washington St	9	20 1/15/2025
							Center St	5	20 1/15/2025
							High St	3	20 1/15/2025
							Beavercreek Road	4	20 1/15/2025
							South 2nd st	2	20 1/15/2025
							Division St	5	20 1/15/2025
							Abernathy rd	2	20 1/15/2025
							7th	4	20 1/15/2025
							5th st.	3	20 1/15/2025
							Warner Parrot Road	2	20 1/15/2025
							Molalla Ave	40	20 2/4/2025
							Beavercreek Road	15	20 2/4/2025
							Warner Milne	23	20 2/4/2025
							5th st.	60	20 2/4/2025
							Central point rd	61	20 2/4/2025
							South End road	80	20 2/4/2025
							Center St	20	20 2/4/2025
							Meyers Rd.	90	20 2/4/2025
							Pearl st	15	20 2/4/2025
							Leland rd	20	20 2/4/2025
							Clairmont Way	40	20 2/4/2025
							Molalla Ave	23	20 2/4/2025
							Beavercreek Road	23	20 2/4/2025
							7th st	23	20 2/4/2025
							Singer Hill rd	23	20 2/4/2025
							Washington St	23	20 2/4/2025
							15th st	23	20 2/4/2025
							Division St	23	20 2/4/2025
							Pearl st	23	20 2/4/2025
							Eluria st	23	20 2/4/2025
							Morton rd	23	20 2/4/2025

Appendix A. Status of Implementing Components of Oregon City's 2022 Stormwater Management Plan (SWMP)									
BMP or activity	Addresses bacteria?	Addresses mercury?	Responsible department	Measurable goals (2022 SWMP)	Tracking measures (2022 SWMP)	Annual report information: tracking measure status, Permit year 2024– 2025	Additional detail related to activities conducted		
							Anchor way	23	20 2/4/2025
							Holcomb Blvd.	23	20 2/4/2025
							Oaktree Terr	23	20 2/4/2025
							12th	23	20 2/4/2025
							John Adams	23	20 2/4/2025
							Barclay Hills Dr.	23	20 2/4/2025
							Jason Lee Way	23	20 2/4/2025
							Duane St	23	20 2/4/2025
							Newell crest Dr.	23	20 2/4/2025
							Peter Skeen Way	23	20 2/4/2025
							Magnolia st	23	20 2/4/2025
							Cascade st	23	20 2/4/2025
							Molalla Ave	40	20 2/6/2025
							Beavercreek Road	15	20 2/6/2025
							Warner Milne	23	20 2/6/2025
							5th st.	60	20 2/6/2025
							Central point rd	61	20 2/6/2025
							South End Rd	80	20 2/6/2025
							Center St	20	20 2/6/2025
							Meyers Rd.	90	20 2/6/2025
							Pearl st	15	20 2/6/2025
							Leland rd	20	20 2/6/2025
							Clairmont Way	40	20 2/6/2025
							Molalla Ave	24	20 2/6/2025
							Beavercreek Road	24	20 2/6/2025
							7th st	24	20 2/6/2025
							Singer Hill rd	24	20 2/6/2025
							Washington St	24	20 2/6/2025
							15th st	24	20 2/6/2025
							Division St	24	20 2/6/2025
							Pearl st	24	20 2/6/2025
							Eluria st	24	20 2/6/2025
							Morton rd	24	20 2/6/2025
							Davis rd	24	20 2/6/2025
							Anchor way	24	20 2/6/2025
							Holcomb Blvd.	24	20 2/6/2025
							Oaktree Terr	24	20 2/6/2025
							12th	24	20 2/6/2025
							9th	24	20 2/6/2025



Appendix A. Status of Implementing Components of Oregon City's 2022 Stormwater Management Plan (SWMP)									
BMP or activity	Addresses bacteria?	Addresses mercury?	Responsible department	Measurable goals (2022 SWMP)	Tracking measures (2022 SWMP)	Annual report information: tracking measure status, Permit year 2024– 2025	Additional detail related to activities conducted		
							Jakson ln	24	20 2/6/2025
							16th	24	20 2/6/2025
							John Adams	24	20 2/6/2025
							City hall	24	20 2/6/2025
							PD Parking lot	24	20 2/6/2025
							Molalla Ave	40	20 2/9/2025
							Beavercreek Road	15	20 2/9/2025
							Warner Milne	23	20 2/9/2025
							5th st.	60	20 2/9/2025
							Central point rd	61	20 2/9/2025
							South End Rd	80	20 2/9/2025
							Center St	20	20 2/9/2025
							Meyers Rd.	90	20 2/9/2025
							Pearl st	15	20 2/9/2025
							Leland rd	20	20 2/9/2025
							Molalla Ave	24	20 2/9/2025
							Beavercreek Road	24	20 2/9/2025
							7th st	24	20 2/9/2025
							Singer Hill rd	24	20 2/9/2025
							Washington St	24	20 2/9/2025
							15th st	24	20 2/9/2025
							Division St	24	20 2/9/2025
							Pearl st	24	20 2/9/2025
							Eluria st	24	20 2/9/2025
							Morton rd	24	20 2/9/2025
							Davis rd	24	20 2/9/2025
							Anchor way	24	20 2/9/2025
							Holcomb Blvd.	24	20 2/9/2025
							Oaktree Terr	24	20 2/9/2025
							12th	24	20 2/9/2025
							9th	24	20 2/9/2025
							Jakson ln	24	20 2/9/2025
							16th	24	20 2/9/2025
							John Adams	24	20 2/9/2025
							City hall Parking lot	24	20 2/9/2025
							PD Parking lot	24	20 2/9/2025
BMP OM-4: Litter Control	●	○	OCPW	<ul style="list-style-type: none"> <li>Develop SOP for clean-up of abandoned campsites in public areas.</li> <li>Add standard litter control language to new event contracts and facility rental agreements.</li> </ul>	1) Status of SOP for pollution prevention during campsite cleanup.	1) Oregon City's Police department has an abandoned campsite policy that was amended in February 2024 to address this SWMP measurable goal.			

Appendix A. Status of Implementing Components of Oregon City's 2022 Stormwater Management Plan (SWMP)							
BMP or activity	Addresses bacteria?	Addresses mercury?	Responsible department	Measurable goals (2022 SWMP)	Tracking measures (2022 SWMP)	Annual report information: tracking measure status, Permit year 2024– 2025	Additional detail related to activities conducted
					2) Status of updated litter control contract language.	2) Oregon city Parks department's Rental manual has been amended to contain current permit language on litter control and all new special event applications are reviewed for litter and water quality BMPs.	
BMP OM-5: Pesticide and Fertilizer Controls			OCPW	<ul style="list-style-type: none"> <li>Develop SOP for pesticide and fertilizer storage, application and disposal.</li> <li>Include SOP in new contracts for landscape maintenance.</li> </ul>	1) Track status of developing pesticide and fertilizer SOP.	1) An integrated pest management plan (IMP) was developed by parks department in 2021 and was modified to address city wide pest management concerns and finalized in February 2024. The IPM can be found on the city NPDES library website.	
Category G. Industrial and Commercial Facility BMPs							
BMP IC-1: Industrial and Commercial Strategy	○	○	OCPW	<ul style="list-style-type: none"> <li>Update Industrial/Commercial Facilities strategy with revised facility screening strategy, inspection processes, and documentation procedures.</li> <li>Develop database of industrial and commercial facilities with the potential for increased stormwater pollution.</li> </ul>	1) Track the status of updating the Industrial/Commercial Facilities Strategy 2) Track the number of facilities referred for 1200-Z permits.	1) IND/COM Facilities Strategy was updated November, 2023 and posted on the city website for public access. 2) No new businesses have been identified or referred to DEQ for 1200-z permit this year.	
BMP IC-2: Industrial and Commercial Inspection Program	○	○	OCPW	<ul style="list-style-type: none"> <li>Investigate 20% of high priority businesses each year and document inspection results and follow-up actions.</li> </ul>	1) Track the number of inspections conducted. 2) Track inspection results and follow-up actions.	No new businesses were ranked with high priority this reporting year. No High priority sites were inspected this year. Two of Oregon City's five existing high priority sites were re-inspected for the 24/25 reporting period.	<ul style="list-style-type: none"> <li><b>DB STEEL, INC - 1800 MAIN ST, OREGON CITY, OR 97045 - INSPECTED 3/2017 &amp; 7/2024</b></li> <li><b>MCI Welding - 15942 PARK PLACE CT, OREGON CITY, OR 97045 - INSPECTED 5/2018 &amp; 7/2024</b></li> </ul>
Category H. Additional Program BMPs							
BMP AP-1: MS4 Staff Training	○	○	OCPW	<ul style="list-style-type: none"> <li>Conduct municipal training for employees associated with stormwater management in OC.</li> <li>Coordinate with other Clackamas County co-permittees regarding regional water quality efforts.</li> <li>Participate in training and advisory committee opportunities available through state and local agencies and groups.</li> <li>Conduct regular stormwater staff meetings one or twice a year.</li> </ul>	1) Track the number of employees receiving training in stormwater management annually. 2) Track OC staff participation in groups, committees, and organizations relevant to stormwater quality management. 3) Track regular stormwater staff meetings and staff attendance at those meetings.	1) Two individuals received training at Clackamas community college on inspections and maintenance of vegetated water quality facilities 2) The water quality coordinator – stormwater continues to attend several committees and organizations that are relevant to stormwater daily management: ACWA, RCCRS, CRC, GOCWC, 3) Refer to table 4 in narrative.	
BMP AP-2: Retrofit Progress Report	○	○	OCPW	<ul style="list-style-type: none"> <li>Complete Retrofit Progress Report by December 1, 2023.</li> </ul>	1) Track the status of completing the Retrofit Progress Report.	1) The Retrofit Progress report was submitted to DEQ in November of 2023. No feedback was given so we assume the report was satisfactory.	
BMP AP-3: Hydromodification Progress Report	○	○	OCPW	<ul style="list-style-type: none"> <li>Complete the Hydromodification Progress Report by December 1, 2023.</li> </ul>	1) Track the status of completing the Hydromodification Progress Report.	1) The Hydromodification Progress report was submitted to DEQ in November of 2023. No feedback was given so we assume the report was satisfactory.	- An outfall at Barclay Hills Storm Outfall (CI 23-014) was reconstructed, regraded to minimize erosion, and return hydrology back to predevelopment conditions in September 2024.
BMP AP-4:	○	●	OCPW	<ul style="list-style-type: none"> <li>Conduct site visits to hydromodification tracking sites and document with photos and tracking for each year.</li> </ul>	1) Track the number of hydromodification	1) Sites 1 through 5 overlap with other monitoring like Dry weather field-screening and in-stream monitoring sites. Site 6 through 14 are visited every August. Site 13 is under	

Appendix A. Status of Implementing Components of Oregon City’s 2022 Stormwater Management Plan (SWMP)							
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Hydromodification Tracking Site Visits					tracking site visits conducted each year.	construction and should be completed by the end of next fiscal year.	
BMP AP-5: Permit Renewal Package				<ul style="list-style-type: none"><li>• Complete 303(d) evaluation (due with permit renewal).</li><li>• Complete TMDL Pollutant Load Reduction Evaluation (due with permit renewal).</li><li>• Develop TMDL Benchmarks (due with permit renewal).</li><li>• Outline proposed changes to the monitoring program (due with permit renewal).</li><li>• Document service area expansions in 2025. Prepare a fiscal evaluation in 2025. Prepare updated maps in 2025.</li><li>• Submit permit renewal application to DEQ by March 30, 2026.</li></ul>	1) Track the status of completing the permit renewal package.	<ul style="list-style-type: none"><li>• Completed 303(d) evaluation (due with permit renewal).</li><li>• Completed GIS evaluation needed for the TMDL Pollutant Load Reduction Evaluation (due with permit renewal).</li><li>• Developing TMDL Benchmarks (due with permit renewal).</li><li>• Outlining proposed changes to the monitoring program (due with permit renewal).</li><li>• Documenting service area expansions in 2025. Prepare a fiscal evaluation in 2025. Prepare updated maps in 2025.</li></ul>	
BMP AP-6: Stormwater Monitoring Program				<ul style="list-style-type: none"><li>• Conduct monitoring in accordance with the updated plan and report results annually.</li></ul>	1) Track the status of DEQ’s approval of the City’s updated Stormwater Monitoring Plan. 2) Track the status of monitoring results.	1) The CCSMP was updated to address current permit requirements in 2022 and was accepted by DEQ in 2023. 2) Monitoring results are recorded and visualized in a master spreadsheet and every reporting year results are uploaded in the appropriate format in DEQ’s YDO by December 1 <sup>st</sup> of each year.	

# **Appendix B**

## **Public Education and Outreach Information**

**Public Education and Awareness Activities**  
**July 1, 2024 – June 30, 2025**

**Table 5: Summary of Activities**

<b>Date</b>	<b>Event</b>	<b>Location</b>	<b>Contact Total</b>	<b>Program/Subject</b>
<b>7/2024</b>	KPTV Public Service Announcements	Portland Metro Area	General Public	Lawn Tips, Car Wash Tips
<b>8/2024 – 9/2024</b>	KPTV Public Service Announcements	Portland Metro Area	General Public	Water Conservation, Car Wash Tips
<b>9/2024</b>	Message on Utility Bill	Oregon City water customers	General Public	Remember, Only Rain Down the Drain!
<b>10/2024</b>	KPTV Public Service Announcements	Portland Metro Area	General Public	Fall Lawn Care, Be Rain Ready
<b>10/2024</b>	Message on Utility Bill	Oregon City water customers	Oregon City water customers	Pick up after your pets! Go to <a href="https://theriverstartshere.org/">https://theriverstartshere.org/</a>
<b>9/30/2024–10/12/2024</b>	Stormwater Banner Display at City Hall	625 Center St. Oregon City, OR	Visitors and Staff at City Hall	Display featuring Oregon City’s major streams; tips to improve water quality
<b>10/13/2024–10/27/2024</b>	Stormwater Banner Display at the Pioneer Center	615 5th St. Oregon City, OR	Visitors and Staff at City Hall	Display featuring Oregon City’s major streams; tips to improve water quality
<b>10/28/2024–10/14/2024</b>	Stormwater Banner Display at the Pioneer Center	13895 Fir St., Oregon City, OR	Oregon City Engineering and Operations Complex	Display featuring Oregon City’s major streams; tips to improve water quality
<b>Winter 2024</b>	Trail News – Winter	Oregon City Public Buildings and City website	All OC residents and general public	Do you Scoop the Poop? Does it really matter?
<b>11/2024</b>	KPTV Public Service Announcements	Portland Metro Area	General Public	Fall Lawn Care, Be Rain Ready
<b>11/20/2024</b>	Tree Planting Event	North Oregon City Neighborhoods	General Public – advertised in Trail News monthly E-newsletter	Friends of Trees tree planting event in the following neighborhoods: Barclay Hills, Canemah, McLoughlin, Park Place, Rivercrest, and South End
<b>12/2024</b>	KPTV Public Service Announcements	Portland Metro Area	General Public	Rain Ready, Sweep don’t wash (winter maintenance)
<b>January 2025</b>	Wildlife and Water Friendly Garden	Oregon City E-News letter	General Public	Winter 2022, will see the return of our FREE Wildlife & Water

	Series – Collaboration between OC and the Environmental Learning Center			Friendly Gardens workshop series, this time with a focus on meeting the challenges of changing climate conditions. Learn how to garden with less water, choose temperature resilient trees, install permeable hardscapes, and more!
<b>Spring 2025</b>	Trail News – Spring	Oregon City Public Buildings and City website	All OC residents and general public	Ditch the weed and Feed, Eco-friendly ways to remove moss.
<b>1/2025</b>	KPTV Public Service Announcements	Portland Metro Area	General Public	Rain Ready, Sweep don't wash (winter maintenance)
<b>1/28/2025</b>	River Starts Here – Student Video Contest	Social Media, OC Website	General Public – generated towards students, grades 9-12	Student engagement in stormwater subjects which impact the students and/or communities
<b>2/2025</b>	KPTV Public Service Announcements	Portland Metro Area	General Public	Rain Ready, Sweep don't wash (winter maintenance)
<b>3/2025</b>	KPTV Public Service Announcements	Portland Metro Area	General Public	Car Wash Tips, Sweep don't wash (winter maintenance)
<b>4/2025</b>	KPTV Public Service Announcements	Portland Metro Area	General Public	Car Wash, Lawn Tips
<b>5/3/2025</b>	Annual Water Quality Report	N/A	15,540**, available on city website	Water Quality Information
<b>Summer 2025</b>	Trail News – Summer	Oregon City Public Buildings and City website	All OC residents and general public	To swim or not to swim – HAB education, The Terrible P's – Pfas and Phthalates education.
<b>5/2025</b>	KPTV Public Service Announcements	Portland Metro Area	General Public	Car Wash, Lawn Tips
<b>6/24/2025</b>	BMP IDDE Handout	Email	Orion Garcia – Express Power Wash	Sent ACWA IDDE handout for pressure washing and surface cleaning for Mr. Garcia's new business
<b>2023-2025</b>	Regional Coalition for Clean Rivers & Streams	N/A	Metro area	Pollution prevention messages via website and social media
<b>2024-2025</b>	Clackamas River Water Providers	N/A	Residents with the Clackamas River as drinking water source	Various programs to promote source water protection, water conservation, and water quality awareness

**\*\*A postcard was mailed to each Oregon City utility customer announcing the on-line availability of the annual water quality report. Those with limited internet access were encouraged to request a printed copy of the report.**





# 2025 OREGON CITY WATER QUALITY REPORT

Read the facts about your water **ONLINE!**

[orccity.news/2025-water-quality-report](https://orccity.news/2025-water-quality-report)



В этом сообщении содержится важная информация о воде, которую вы пьёте. Попросите кого-нибудь перевести для вас это сообщение или поговорите с человеком, который понимает его содержание.

Este informe contiene información importante acerca de su agua potable. Haga que alguien lo traduzca para usted, o hable con alguien que lo entienda.

Figure 1: Photo on 2025 Annual Water Quality Report Postcard chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.orcity.org/ArchiveCenter/ViewFile/Item/301

## I. Pressure Washing Informational Handout to Customer



Figure 2: ACWA IDDE Pressure Washing Informational Hand Out

**II. Stormwater Banner Display at City Hall: 9/23/2024-10/06/2024, Pioneer Center: - 10/07/2024-10/20/2024, & Oregon City Engineering and Operations Complex: 10/21/23 - 11/03/2023**

Visitors to City Hall (625 Center St) the Pioneer Center (615 5th St), & Oregon City Engineering and Operations Complex (13895 Fir St). Customers visiting these three facilities, Pioneer Center (as well as city staff, could view our stormwater banner display featuring Oregon City's largest basins and streams. Included are the following suggestions to prevent stormwater runoff pollution and to improve water quality:

- Never dump anything down storm drains or into streams
- Sweep driveways and patios clean instead of hosing them down
- Repair your vehicles if they are leaking oil, antifreeze, or other fluids
- Take your car to a car wash, or wash it on the lawn instead of the driveway
- Minimize your use of fertilizers and pesticides; consider going organic
- Plant native trees and shrubs; if you have a stream flowing through your property streamside plantings will help reduce the temperature of the water
- Pick up after your pet

The banner includes contact information for the Greater Oregon City Watershed Council and how to obtain additional information about Oregon City's Stormwater Management Plan.

**III. Clackamas River Water Providers – ongoing throughout the year**

Oregon City, through its association with South Fork Water Board, partners with other agencies that use the Clackamas


River for potable water, to promote source water protection and water conservation. Programs include water quality monitoring and a pesticide outreach program. For specific information, and to read their annual report, visit the CRWP website at [www.clackamasproviders.org](http://www.clackamasproviders.org).

**IV. The Oregon City Website – ongoing throughout the year**

A wide variety of information pertaining to stormwater, water quality, and Oregon City's NPDES MS4 permit is available to the public at [www.orcity.org](http://www.orcity.org).



## Social Media Posts


**Oregon City - City Hall**  
Published by Jarrod Lyman · May 22 ·

The Stormwater division of Oregon City Public Works urges everyone to "Do their doody" and "scoop the poop." Pet waste contains harmful bacteria and other nasties that can seriously impact water quality if it washes down storm drains. So for National Public Works Week this week, and for your fellow residents every other week, please pick up after your pets.

### ATTENTION HUMANS


Please scoop the poop and not feed the waterfowl.


Keep our water safe and clean!



### ATTENTION ANIMALS

WOOF! QUACK! TWEET! Have fun.





The Partners for Clean Water thank you.

[See insights and ads](#)

Boost post



## Oregon City - City Hall

Published by Jarrod Lyman · May 8 ·



Oregon City's Inflow and Infiltration project, or "I and I" received an Award of Excellence from the [League of Oregon Cities](#) last week.

The I and I program has rehabilitated and constructed about 20,000 linear feet of mainline, plus numerous lateral sewer connections. This work prevents stormwater from making it into the sewer system, preventing overflows, and saving money by preventing treatment on water that didn't need it.



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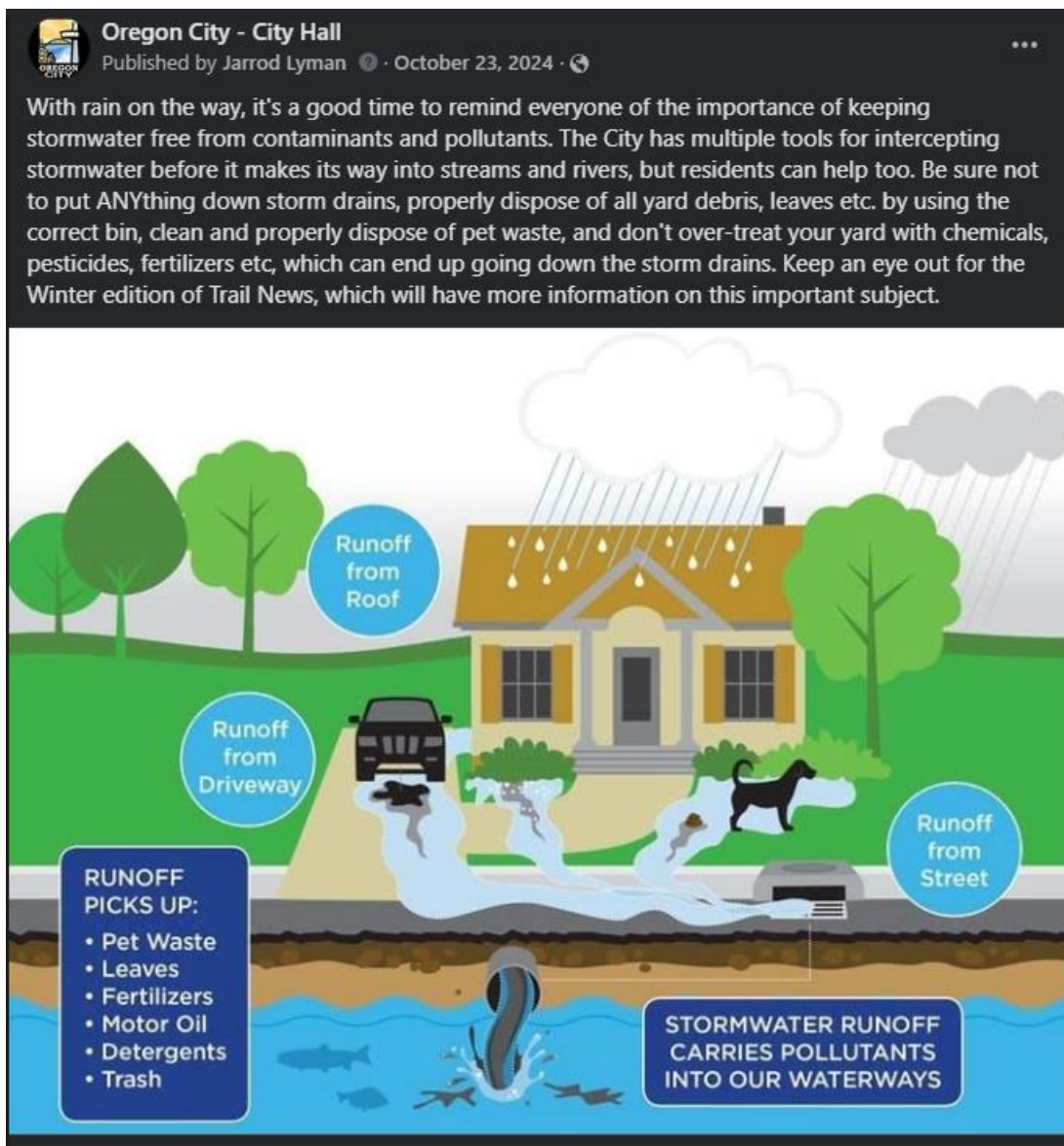
Would you look at that, the sun is out! This break in the weather is allowing our Stormwater Department to get in some necessary storm system maintenance, which will require the closure of Harrison St. between 15th and 16th Streets. The closure will be in effect Jan 7 - 9 from 7:30 a.m. to 4 p.m. As usual, local traffic and emergency vehicles will be allowed access.



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## Collaboration with Other Agencies

### **V. Clackamas River Water Providers – ongoing throughout the year**

Oregon City, through its association with South Fork Water Board, partners with other agencies that use the Clackamas

River for potable water, to promote source water protection and water conservation. Programs include water quality monitoring and a pesticide outreach program. For specific information, and to read their annual report, visit the CRWP website at [www.clackamasproviders.org](http://www.clackamasproviders.org). “Clean Water, It’s Our Future” Campaign on KPTV Chanel 12 on Television and Website (<https://www.kptv.com/water/>)

Oregon City continues to partner with other agencies in the Portland metro area in sponsoring public education messaging via KPTV media outlets. The campaign identifies simple things that

can be done to keep our rivers and streams healthy. The following topics were highlighted on their website, social media, and television during the 2024-2025 campaign:

- Reducing stress while gardening
- Car maintenance
- Water friendly weed control
- Clean gutters and storm drains
- Fall lawn tips
- Clean driveways

#### **VI. Regional Coalition for Clean Rivers and Streams**

Oregon City is one of the Clean River Partners of Clackamas County. As such, the city continues to support the effort, along with other agencies in the Portland metro area, to educate the public about the impact of stormwater runoff pollution on the health of our rivers and streams. For specific information about the current campaign – The River Starts Here – visit the Coalition website at <http://theriverstartshere.org/>.

#### **VII. The Environmental Learning Center at Clackamas Community College**

Oregon City has begun a partnership with the Environmental Learning Center (ELC) at Clackamas Community College (CCC) to fund Watershed Health Program Activities for all age groups ranging from Preschool Programs to adults and continuing professional education.

## **Appendix D**

### **TMDL Annual Report**

City of Oregon City  
Willamette River TMDL Implementation Plan  
Annual Progress Report

December 1, 2025

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## **Introduction**

The City of Oregon City (City) submitted its first Willamette River Total Maximum Daily Load Implementation Plan (TMDL Implementation Plan) to the Oregon Department of Environmental Quality (DEQ) on March 31, 2008. DEQ requires the City to conduct a review of the TMDL Implementation Plan every five years, and to provide updates to the plan based on those reviews. As a result, the City's plan was updated in May of 2014, and January of 2019 (DEQ comments were also addressed in the 2019 plan in 2020). In the interim, in February of 2021, DEQ and EPA finalized an update to the Willamette River TMDL for mercury. That TMDL update required the City to update their TMDL Implementation Plan to address mercury-specific requirements within 18 months. Oregon City submitted the updated TMDL Implementation Plan to address the mercury-specific requirements in August, 2022. DEQ approved this plan on June 28, 2023. Oregon City conducted another comprehensive five-year review of TMDL implementation at the end of 2023. As a result, minor changes were made to update some outdated references and the current plan is dated December 31, 2023.

This annual report provides a summary of the City's efforts during the reporting year from July 1, 2024 – June 30, 2025 based on the 2023 plan.

## **Background**

The City's TMDL Implementation Plan identifies and describes management strategies that the City will implement to address nonpoint sources of pollution generated in Oregon City's portion of the Clackamas and Middle Willamette River subbasins in the Willamette River watershed. The TMDL parameters of concern for these subbasins include temperature, bacteria, and mercury.

While the TMDL Implementation Plan addresses nonpoint sources of pollutants, DEQ includes requirements within the City's NPDES MS4 permit as they pertain to point sources of TMDL pollutants. The NPDES MS4 permit requires best management practices (BMPs) as outlined in a Stormwater Management Program Document (SWMP) to be applied to address these point sources of pollution in stormwater runoff. At permit renewal, the NPDES MS4 permit also requires Oregon City to develop TMDL pollutant load reduction benchmarks to show progress towards meeting TMDL wasteload allocations. Finally, the NPDES MS4 permit requires adaptive management to ensure that stormwater programs are reviewed, expanded and refined over time to make continued progress towards meeting

wasteload allocations.

Management strategies for nonpoint sources of bacteria and mercury are summarized in the City's TMDL Implementation Plan, but compliance with the TMDL for these parameters is mostly covered by implementation of management practices summarized in the City's NPDES MS4 Permit SWMP. This provides efficiencies, as the City's SWMP is implemented city-wide regardless of whether pollutant sources (i.e., bacteria and mercury) are attributed to point sources (the municipal stormwater conveyance system), or nonpoint sources (runoff which directly discharges overland to local water bodies without first entering the City's stormwater conveyance system). Outside of the City's SWMP, additional management strategies to address nonpoint sources of bacteria and mercury include riparian area plantings which help to filter runoff. These riparian area practices are summarized in the temperature section of the TMDL Implementation Plan.

Stormwater runoff in the Willamette Valley is not considered to be a problem with respect to temperature. Therefore, temperature is solely considered to be a nonpoint source issue and is not addressed or covered by the City's NPDES MS4 permit. Management strategies for temperature were developed and included in the City's TMDL Implementation Plan. Historically, riparian vegetation removal and channel modifications have resulted in reduced baseflows, reduced stream shade, and increased instream temperatures. As part of the first TMDL Implementation Plan, a Geographic Information System-based evaluation of the City's stream corridors was conducted to evaluate existing shade conditions and identify opportunities for riparian vegetation enhancement. Strategies to address temperature were identified, and a timeline and schedule for implementation were provided in the plan.

For the 2019 TMDL Implementation Plan, the City reevaluated and updated maps for the purpose of reconfirming stream shade opportunities. A new series of maps were created using an updated stream layer and updated aerial photographs. In some areas, the updated stream layer affected the original delineation of the 60-foot buffer and the maps were updated accordingly. Additional/updated strategies to address temperature were identified and a timeline and schedule for implementation were provided in the updated plan.

### **Implementation Status**

As previously stated, management practices in the City's NPDES MS4 permit SWMP address both point sources and nonpoint sources of bacteria and mercury to address the Willamette Basin TMDLs. Progress towards implementing BMPs to address bacteria and mercury are summarized in Appendix A of the 2024–2025 NPDES MS4 Annual Report that will be submitted to DEQ by December 1, 2025 as required by the permit. Progress related to riparian area practices are provided in this TMDL Implementation Plan Annual Report.

As required by Schedule D.3.b of the previous 2012 NPDES MS4 permit, Oregon City submitted a TMDL Wasteload Allocation Attainment Assessment (WLAAA) on October 29, 2015. Four hypothetical BMP scenarios were evaluated to determine what types of BMPs and coverage levels would be needed to achieve the established TMDL wasteload allocations for bacteria (*E. coli*). Mercury wasteload allocations had not yet been included in the Willamette



River TMDL. A financial analysis of the cost to construct and maintain these BMPs was included in the evaluation.

Results from the WLAAA indicated that achievement of the waste load allocation for E. coli is not practical or feasible with current structural stormwater treatment BMPs given the effectiveness of BMPs, the City's practical and physical constraints and current fiscal abilities. The City continues its work towards reducing pollutant loads and hydromodification impacts by looking for opportunities for new water quality facilities, incorporating treatment measures into transportation and road improvement projects whenever feasible, and investigating retrofit opportunities on City-owned properties.

The City's progress towards implementing strategies to address temperature, bacteria, and mercury is summarized in Table 1 of this annual report. Such strategies include public education and outreach activities, implementation of development standards to promote infiltration, and shade preservation and planting activities. As described in the TMDL Implementation Plan, the City had committed to contributing \$5,000 per year for the duration of the Plan (2024 – 2028) to enhance riparian vegetation. Table 1 lists how this commitment has been addressed during the 2024 – 2025 reporting period. In 2023 the City entered a contract with Greater Oregon City Watershed Council (GOCWC) to pursue shade planting opportunities outside of Oregon City's jurisdictional boundaries. The City has committed an additional \$10,000 annually towards the partnership with GOCWC.

APPENDIX B: Table B-1. City of Oregon City Summary of Strategies to Address Temperature, Bacteria, & Mercury							
Best Management Practice or Activity	Responsible Division	Commitment/ Implementation Strategy <i>What will be done in the next 5 years?</i>	Measurable Goal <i>Specific ways to implement strategy (Fiscal analysis as needed)</i>	Performance Measure <i>How implementation will be demonstrated</i>	Timeline <i>When goal will be achieved?</i>	Milestone <i>Intermediate indicators of progress</i>	Status <i>Progress update for reporting period (Gap analysis discussion as needed)</i>
Planting	Public Works	Utilize annually committed funds towards shading and planting activities for identified public and private opportunity areas. (\$15,000 allocated annually for planting related activities.)	Conduct a desktop GIS evaluation and ground truthing to evaluate planting progress since 2020, and to identify whether replanting or maintenance is required for identified public planting opportunity areas shown in Appendix D.	<ul style="list-style-type: none"><li>Document results of the desktop evaluation and ground truthing.</li><li>Update maps to help catalog and schedule replanting needs for public and private property.</li></ul>	<ul style="list-style-type: none"><li>Compile mapping information per Appendix D of the TMDL Implementation Plan and updated aerial imagery by December 2025.</li><li>Visit all public sites as part of the ground truthing efforts by July 1, 2026.</li><li>Prepare maintenance and planting schedule for public priority planting sites based on ground truthing exercise by November 1, 2026.</li></ul>	All public sites will be visited, verified and reprioritized for planting by February 1, 2027.	Oregon City is in the process of updating aerial imagery for appendix D and should be completed by December 2025.  36 trees were planted this reporting year (FY-24/25).
			Conduct or financially support planting activities as identified for priority public and private shade opportunity areas.	<ul style="list-style-type: none"><li>Track and map public planting and maintenance activities in accordance with funding activities.</li><li>Annually monitor previous year's plantings to evaluate survivability.</li></ul>	By July 2024, update field inspection forms and procedures for monitoring planting activities in conjunction with routine stormwater inspection activities.	each year, dedicated funds of \$5,000 are spent preparing, planting and/or maintaining identified public or private shade opportunity areas for the duration of this plan.	Tree Cost - \$6,206 Planting cost - \$1,800 Summer watering - \$3,600 Total \$11,606
			Continue partnership and funding of \$10,000 per year, towards the Greater Oregon City Watershed Council (GOCWC) to identify shade planting opportunities on private lands. To receive funding, GOCWC will be responsible for clearing, planting and maintenance for 2 years.	<ul style="list-style-type: none"><li>Attend GOCWC meetings every 2 months to discuss potential sites, objectives and timelines.</li><li>Track and map private property planting activities in accordance with funding activities.</li></ul>	Ongoing throughout the implementation period.	The GOCWC will provide annual progress reports noting planting activities to the City.	350 mixed species trees and shrubs were planted at the Beemer way project site. Willow stakes were also planted in the wetland. \$3,550 was spent for installation and native plant growth and removal of invasives  2425 mixed species trees and shrubs were planted at the Loun project site along Redland Rd. \$3,320 was spent for installation and site treatment.  Additional funds were leveraged through property owner and other grant contributions.

Hydromodification Projects	Public Works	Complete one, and initiate one Hydromodification Project identified in the 2015 Hydromodification Assessment or Stormwater Master Plan during this implementation period.	Prioritize the list of hydromodification sites based on access, land ownership, partnerships, and necessity. Efforts may occur in conjunction with the 2020 stormwater master plan.	Document results of the site prioritization effort.	Update prioritized project list by November 1, 2026.	At least one project will have been completed and one project will have started during the implementation period.	An outfall at Barclay Hills Storm Outfall (CI 23-014) was reconstructed, regraded to minimize erosion, and return hydrology back to predevelopment conditions.
			Initiate design and construction efforts in accordance with the site prioritization.	Track internal meetings related to project implementation.	Ongoing throughout the implementation period.		
Implement Stormwater Design Standards	Public Works	Implement Chapters 13 of the City's development code, which includes provisions for use of infiltration-based stormwater treatment systems and tree planting.	Adhere to the management standards, set forth in OCMC 13.12 and the City's updated (2016) Stormwater Design Standards.	<ul style="list-style-type: none"> <li>Provide the standards to local engineers, developers, builders, and City staff through trainings and the City's website.</li> <li>Track private and public water quality facility installations, based on completion of Maintenance Covenant and Access Easement Agreement.</li> </ul>	Ongoing throughout the implementation period.	Minor editorial revisions and updates to design standards will be conducted approximately every 3 years as needed.	
Preservation of Existing Shade	Planning and Public Works	Continue to refine and enforce Chapter 17 of the City's code pertaining to the protection of riparian vegetation and buffer areas.	Continue to implement Chapter 17.49 of the City's Natural Resource Overlay District (NROD) development code to address Title 3 and Title 13.	<ul style="list-style-type: none"> <li>Track modifications to Chapter 17.49 in accordance with Title 3 and Title 13 objectives.</li> <li>Track any enforcement actions taken to protect existing shade.</li> </ul>	Ongoing throughout the cycle.	N/A	5 Code Enforcement cases were opened for NROD violations REQ-10553_311Ganong REQ-9794_216-3rdAve_MG REQ-10696_302_3rdAve REQ-10910_16743Livesay
Public Education	Public Works	Distribute temperature- related educational materials in the City newsletter and through direct mailings and signage.	Ensure distribution of a minimum of one temperature-related piece of educational material (i.e., flyer, signage) during each year of the implementation period.	Record temperature- related educational materials distributed annually.	Ongoing throughout the cycle.	N/A	Temperature-related articles were disseminated by OCPW in the following: •2025 Annual Water Quality Report When submitted (December 1, 2025), see also Appendix C of the City's 2024-2025 NPDES MS4 Annual Report for specific details regarding public education.