

2023-2025 Commission Goals and Strategies



Job Category

June 2025 Update

Department Contact:	Dayna Webb	Date:	February 3, 2025
Percentage Complete:	Ongoing	Target Completion:	Ongoing Program

Goal 7.2 National Pollution Discharge Elimination System (NPDES) requirements/sampling

Important or Relevant Dates/Milestones: (looking ahead at the next 3 months)

November 1, 2023 – Provide the City Commission with an annual presentation regarding the City's stormwater program, municipal stormwater pollution prevention activities, and best practices for residents to prevent stormwater pollution. Done

November 2023 – Aligned with the City's Winter Weather Response Plan, develop an SOP for the City's road maintenance strategy to document material selection, storage, proper application (timing and rates), collection, and reuse opportunities. Done

February 26, 2024 – Provide the Planning Commission with an annual presentation regarding the City's stormwater program, municipal stormwater pollution prevention activities, and best practices for residents to prevent stormwater pollution. Done

February 28, 2024 – Develop an SOP that outlines pollution prevention measures when cleaning up abandoned campsites in public areas. SOP may be added to the larger Municipal Operations SOP (BMP OM-2). Done

February 28, 2024 – Develop an SOP for pesticide and fertilizer storage, application, and disposal. SOP may be added to Municipal Operations SOP in OM-2. Revise standard language for maintenance and landscaping contracts to include provisions and restrictions for pesticide and fertilizer application. Done

November 2024 – Prepare an illicit discharge ordinance that will update OCMC 8.08 to specifically prohibit illicit discharges (and allow or conditionally allow others), consistent with NPDES MS4 Permit Schedule A.1.d. Include escalating enforcement based on severity and intent of incident. Done

November 2024 – The City's Annual NPDES MS4 2023-2024 Annual Report has been submitted to Oregon Department of Environmental Quality. Done.

December 2024 - Prepare an Erosion & Sediment Control ordinance that will update OCMC 17.47 to define construction site waste as anything material leaving the site without proper treatment (stowed in waste bin, filtered before entering waters of the state, etc.). This amendment is consistent with NPDES MS4 Permit Schedule A.3.d.i Ordinance and/or Other Regulatory Mechanisms. Done

March 3rd, 2025 - Mercury Monitoring IGA between Water Environmental Services, Oregon City and 9 other Co-permittee members were fully executed to ensure the quality and consistency of permit mandated monitoring is conducted in a timely and economic fashion. This is consistent with NPDES MS4 Permit Schedule B.1.b Monitoring Requirements Table 3. Done

May 6th, 2025 - More Benthic Macroinvertebrate Monitoring with Wolf Water Resources, Inc IGA With Oregon City & Water Environmental Services was fully executed to ensure the quality and consistency of permit mandated monitoring is conducted in a timely and economic fashion. This is consistent with NPDES MS4 Permit Schedule B.1.b Monitoring Requirements Table 3. Done

May 2025 - Completed GIS Mapping and Data Collection for permit renewal package. Saving money for the 25/27 Biennium Budget. Done.

April 2026 – Permit Renewal Package and application due. Each NPDES MS4 phase 1 individual permit is valid for a 5-year cycle and our current permit is scheduled to expire in September 2026. The renewal package includes: a renewal application, assessment of current pollutants impairing our watersheds, evaluation of pollutant load reduction with current BMPs modeled within our city's borders, Development of pollutant load reduction Benchmarks to meet in the next five years and propose any changes to monitoring plan. 50% Done

Status: (What has been done/Is Being Done)

The Public Works Department Manages the NPDES Program within the Stormwater Division and in accordance with the NPDES Municipal Separate Storm Sewer System (MS4) Phase I Permit. Our Stormwater Management Program (SWMP) document lays out a long list of activities the City must implement to comply with the City's NPDES MS4 Permit. The program categories include Public Education and Outreach, Public Involvement, Illicit Discharge Detection and Elimination, Erosion and Sediment Control, Post Construction, Municipal Operations and Maintenance, Industrial and Commercial Program, and additional program elements.

Details on the City's NPDES program are most easily found via the City's website at
<https://www.orcity.org/1165/NPDES-MS4-Phase-I-Permit---Clackamas-Gro>

One all-encompassing accomplishment of the NPDES program is the City's dedicated NPDES webpage. providing access to a long list of reference documents compiled in one location accessible to the public is a recent accomplishment. Website access provides easy access to the MS4 Permit, the SWMP, a long history of annual reports, and several other supporting documents that the City has created to maintain compliance with Federal and State mandates and to reduce discharges of pollutants to receiving waters.

Illicit discharge detection and elimination (IDDE) remains a priority. Public works to continue to assess new outfall sites for consideration for this inspection process. The prioritization criteria for Outfall inspections were reviewed and deemed appropriate for current permit requirements and language for IDDE SOP was updated to reflect the 2021-2026 MS4 permit. Allowable discharges were recently defined in OCMC 8.08 prohibiting all other substances from entering waters of the State.

The construction site runoff control program continues to remain effective. This is accomplished through regulatory requirements, plan reviews, permitting and construction site inspections, enforcement procedures, education, and training. Procedures are clearly outlined in the newly completed Oregon City Erosion Control Enforcement Standard of Practice, as required by SWMP BMP EC-6. OCMC 17.47 has been amended to include any type of waste or debris originating from a construction site as a pollutant, increasing our enforcement capabilities on construction BMPs.

Inspections of public stormwater management facilities remain a routine practice. Staff is tasked with Identifying maintenance needs and issuing work orders when repairs or maintenance is required. For the publicly owned facilities Staff perform maintenance actions to maintain stormwater management facility performance monthly.

Public Works Develop an SOP that outlines pollution prevention measures when cleaning up abandoned campsites in public areas.

Public Works Develop an SOP for pesticide and fertilizer storage, application, and disposal. Staff have conducted inspections of high-priority businesses identified through the industrial/commercial facility screening program. During site inspections, staff review onsite stormwater systems, pollution prevention measures, material transport and storage, and waste disposal. The Industrial/Commercial Facilities Strategy has been updated to reflect new permit language and submitted the Final document (with comments addressed) to the DEQ and is now available on the City's website.

Staff have begun translating published public informational fliers and key program outreach information to load them on the Department's website.

The green infrastructure/low impact design (LID) strategy has been completed to reflect new permit language & a gap analysis has been performed on all municipal Codes and Standards to ensure there are no barriers to LID implementation. A technical review memo of the gap analysis has been made available to the public and DEQ in the online library. Three capital improvement projects have been constructed as a result of addressing the 2015 hydromodification assessment to minimize stream bank erosion and improve water quality. Site prioritization, assessment, and planning for future improvements is ongoing. An update is required by the DEQ and was submitted with the MS4 annual report.

Currently leading the charge on the permit renewal package process for all 12 co-permittees; organizing cost-share opportunities and discovering hurdles for other permittees and ways to overcome them. The permit renewal package is on track for early or on-time completion.