



2023-2025 Commission Goals and Strategies

Job Category

September 2023 UPDATE

Department Contact:	John Lewis	Date:	Sept. 21,2023
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.

NOVEMBER 2023 – ALIGNED WITH THE CITY'S WINTER WEATHER RESPONSE PLAN, DEVELOP A SOP FOR THE CITY'S ROAD MAINTENANCE STRATEGY TO DOCUMENT MATERIAL SELECTION, STORAGE, PROPER APPLICATION (TIMING AND RATES), COLLECTION AND REUSE OPPORTUNITIES.

DECEMBER 2023 - 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.

JUNE 2023 - 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.

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 IS MOST EASILY FOUND ON VIA THE CITY'S WEBSITE AT [HTTPS://WWW.ORCITY.ORG/1165/NPDES-MS4-PHASE-I-PERMIT---CLACKAMAS-GRO](https://www.orcity.org/1165/NPDES-MS4-PHASE-I-PERMIT---CLACKAMAS-GRO)

ONE ALL-ENCOMPASSING ACCOMPLISHMENT FOR 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 REMAINS A PRIORITY. STAFF RECENTLY COMPLETE DRY WEATHER OUTFALL INSPECTIONS, SEVERAL NON-RESIDENTIAL STORMWATER MANAGEMENT FACILITIES WERE CONFIRMED TO BE FREE OF ILLICIT DISCHARGE.

CONSTRUCTION SITE RUNOFF CONTROL PROGRAM CONTINUES TO REMAIN EFFECTIVE. THIS IS ACCOMPLISHED THROUGH REGULATORY REQUIREMENTS, PLAN REVIEWS, PERMITTING AND CONSTRUCTION SITE INSPECTIONS, ENFORCEMENT PROCEDURES, TRAINING, EDUCATION AND TRAINING.

INSPECTIONS OF PUBLIC STORMWATER MANAGEMENT FACILITIES REMAINS A ROUTINE PRACTICE. STAFF IS TASKED WITH IDENTIFYING MAINTENANCE NEEDS AND ISSUE WORK ORDERS WHEN REPAIRS OR MAINTENANCE IS REQUIRED. FOR THE PUBLICLY OWNED FACILITIES STAFF PERFORM MAINTENANCE ACTIONS TO MAINTAIN STORMWATER MANAGEMENT FACILITY PERFORMANCE ON A MONTHLY BASIS.

STAFF HAVE CONDUCTED INSPECTIONS OF HIGH PRIORITY BUSINESSES IDENTIFIED THROUGH THE INDUSTRIAL/COMMERCIAL FACILITY SCREENING PROGRAM. DURING SITE INSPECTIONS, STAFF REVIEWS 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 HAS BEEN UPLOADED TO THE WEBSITE FOR A 30-DAY COMMENT PERIOD BEFORE SUBMITTING THE FINAL DOCUMENT (WITH COMMENTS ADDRESSED) TO THE DEQ (DUE DECEMBER 1, 2023).

THE GREEN INFRASTRUCTURE/LOW IMPACT DESIGN (LID) STRATEGY HAS BEEN UPDATED 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.

TWO 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 IS BEING FINALIZED FOR SUBMISSION (DUE DECEMBER 1, 2023)