

**City of Dallas, OR**

**TMDL Implementation Plan  
2022 – 2023 ANNUAL REPORT**



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October 30, 2023

## Certification

*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.*



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## ACRONYMS

BMPs	Best Management Practices
City	City of Dallas
CESCL	Certified Erosion and Sediment Control Lead
CS	Construction Site Runoff
CWA	Clean Water Act
DEQ	(Oregon) Department of Environmental Quality
DMA	Designated Management Agency
ESCP	Erosion and Sediment Control Plan
EPA	United States Environmental Protection Agency
GH	Good Housekeeping in Municipal Operations
ID	Illicit Discharge Detection and Elimination
LID	Low Impact Development
LUCS	Land Use Compatibility Statement
LWI	Local Wetland Inventory
MCM	Minimum Control Measure (aka Stormwater Controls)
NPDES	National Pollutant Discharge Elimination System
NPS	Nonpoint Sources (not under an NPDES permit)
NWI	National Wetland Inventory
OAR	Oregon Administrative Rules
ODA	Oregon Department of Agriculture
ODFW	Oregon Department of Fish and Wildlife
PC	Post-Construction Runoff Control in New and Re-development
PE	Public Education
PI	Public Involvement
RY	Report Year
SWPPP	Stormwater Pollution Prevention Plan
SWMP	Stormwater Management Plan
TMDL	Total Maximum Daily Load
TSS	Total Suspended Solids
UIC	Underground Injection Control Device
USGS	United States Geological Survey
WQMP	Water Quality Management Plan

## Table of Contents

<b>Section 1 – Introduction</b>	1
1.1 Background	1
1.2 Program Summary 2022/2023	1
1.3 Report Format	2
<b>Section 2 – Program Strengths and Weaknesses</b>	2
2.1 Program Strengths	2
2.2 Program Weaknesses	3
<b>Section 3 – Public Education</b>	3
3.1 Overview	3
3.2 BMP Accomplishments/Discussion	4
<b>Section 4 – Public Involvement</b>	5
4.1 Overview	5
4.2 BMP Accomplishments/Discussion	5
<b>Section 5 – Illicit Discharge Detection and Elimination</b>	6
5.1 Overview	6
5.2 BMP Accomplishments/Discussion	6
<b>Section 6 – Construction Site Runoff</b>	7
6.1 Overview	7
6.2 BMP Accomplishments/Discussion	8
<b>Section 7 – Post-Construction Runoff Control</b>	9
7.1 Overview	9
7.2 BMP Accomplishments/Discussion	9

<b>Section 8 – Good Housekeeping in Municipal Operation</b>	10
8.1 Overview	10
8.2 BMP Accomplishments/Discussion	11
<i>Table 8.2 Street Sweeping Totals</i>	11
<b>Section 9 – Public Involvement Evaluation</b>	12
<b>Section 10 – Program Monitoring / Adaptive Management</b>	13
10.1 Program Monitoring	13
10.2 Adaptive Management	13
<b>Section 11 – Projections for 2023/2024</b>	14
11.1 Temperature	14
11.2 Closing Summary	14

**ATTACHMENTS:**

- A BMP Status 2022/2023
- B TMDL Matrix 2022/2023 with editing
- C TMDL Matrix 2023/24

## Section 1 Introduction

This document serves as the 2022/2023 Report Year Annual Report for the City of Dallas. The City has a population of 16,854 according to the 2020 U.S. Census. This annual report has been written by the City's consultant and City staff. It has been reviewed and approved by the Dallas Public Works Director and City staff.

The City of Dallas discharges stormwater to Rickreall Creek, North Fork Ash Creek, Bashaw Creek. Rickreall Creek and the North Fork Ash Creek are tributaries of the Willamette River.

### 1.1 Background

Dallas submitted their Total Maximum Daily Load (TMDL) Implementation Plan in 2008 as a response to the 2006 Willamette Basin TMDL and Water Quality Management Plan (WQMP). This initial TMDL addressed mercury, temperature, and bacteria.

The City's plan was revised in 2018 and again in 2022. The latest version of the plan was in response to the 2019 Final Willamette Basin Mercury TMDL and WQMP. DEQ officially approved the 2022 plan on May 16, 2023. Dallas also submitted their 5<sup>th</sup> Year Report (evaluation) on June 15, 2023 to document progress on the best management practices (BMPs) listed in the Implementation Plan. As part of these revisions and program adjustments, the City also changed their report year to October 1 through September 30 of each year. Annual reports are due on November 1. For the report year 2022/2023, the yearly report includes programmatic activities for June, July, August, and September of 2022 in addition to the report year. This action was taken in order to document full implementation for the report year change.

### 1.2 Program Summary 2022/2023

As is documented in the 2022 TMDL Implementation Plan, Dallas has been a Designated Management Agency (DMA) since 2006. The City has had successes and failures over that time period, but the progress the City has made in Report Year (RY) 2022/2023 clearly demonstrates that Dallas is dedicated to successfully implementing the program. Accomplishments and shortfalls are discussed in Section 2.



*May 31, 2023 – Outdoor School*

### **1.3 Report Format**

This report has been formatted with public and DEQ review in mind. Sections 1 through 8 of the report include a detailed accounting of program implementation for the review period of June 15, 2022 through September 30, 2023. The reported progress is described through control measures and associated BMPs and activities in the Sections that follow.

The required Public Education Evaluation is covered in Section 9. Program monitoring and any adaptive management activity is found in Section 10, and temperature is covered in Section 11.

Appendix A, BMP Status, is an at-a-glance table listing the BMPs and the status as of September 30, 2023. This table is for the first report year of the revised plan and does not address new or revised BMPs. The TMDL Implementation Plan matrix is attached as Appendix B. The matrix has been edited to include updates to language which is noted in red text. Any text proposed for removal is listed as a strikeout. The status column includes program progress for the report year. Finally, Appendix C is the revised matrix for Report Year 2023/2024 which includes new language and BMPs.

More detail for activities can be found in the narrative portion of this document. Adaptive Management is covered in subsection 10.2

## **Section 2 Program Strengths and Weaknesses**

### **2.1 Program Strengths**

Dallas hired a consultant in 2021 to assist with development of the revised TMDL Implementation Plan required by the Final Willamette Basin Mercury TMDL. The development of the revised plan set the foundation for a more cohesive program that clearly addressed the pollutants of concern within the 6 control measure framework. Dallas has been actively implementing the revised plan since June 2022.

The City of Dallas hired a new employee, the Environmental and Field Inspection Technician, in 2022 to assist with TMDL related BMPs in the organization. Dallas has also hired a Geographic Information System (GIS) technician in the past year. These 2 positions have been critical in program successes during the RY. The City has made significant strides in educating the public, and has covered program elements and requirements for elected officials. Dallas is currently working on development of their illicit discharge and construction site runoff programs. Employee training has been addressed in areas such as illicit discharge, erosion control and construction site runoff, post-construction runoff, and good housekeeping activities.

Public education efforts have been a high point for the City of Dallas. In addition to adding a significant amount of new information to the website, staff also took the initiative to get involved in a local Outdoor School for the 5<sup>th</sup> graders from Whitworth Elementary School. The event was held May 31, 2023 to June 2, 2023 on the Little Luckiamute River near Falls City. Approximately 170 students attended and participated in a rotating station program covering topics such as macros, indicator species, habitat, and water quality. The program was very successful and is expected to become an annual event. Staff received positive feedback from the instructors who organized the event.



*Dallas City Park*

## **2.2 Program Weaknesses**

The City is moving forward with program implementation in a proactive manner. With so much internal growth over the review period, shortfalls in the program are limited. The report year for 2022/2023 was a year of growth for the City of Dallas in regard to TMDL implementation. With an eye on all that has been accomplished, staff needs to direct more attention toward reaching target audiences with specific messages as it applies to public education. As was noted in the previous section, the City has done a very good job of elevating public education activities, but more emphasis on specific groups will help shape the City into a reliable resource for the community.

As is the case with many TMDL communities, Dallas needs to include vision in their program planning efforts. A focus on developing defensible long-term activities rather than meeting short term goals will help build a successful program within the community.

Dallas will need to continue the momentum they have developed over the past year to remain current with their TMDL obligations. Staff is currently being shared between Public Works Divisions with outside support from the City’s consultant. In the future, Dallas will need to address the staffing levels for the TMDL/stormwater program.

## **Section 3 – Public Education (PE)**

### **3.1 Overview**

The City made good progress in developing its Public Education Program in 2022/2023. The material that has been developed addresses mercury, temperature, and bacteria. The City has utilized the website, direct handouts, the City’s monthly newsletter, and hands-on education to educate the residents of Dallas. More emphasis will be placed on reaching target audiences and refining education activities in 2023/2024.



### **3.2 BMP Accomplishments/Discussion**

**PE-1 *Education Material Resource Development.*** A portfolio of education and outreach material was developed during the report year. The portfolio includes an overview of mercury, temperature, and bacteria to assist staff with communicating with the public. Messages were developed for brochures, handouts, and social media. The portfolio includes resources links as well as suggestions to help create messages from existing themes such as ‘walk your pet day’ and ‘go barefoot day’. Personnel will continue to update the portfolio with new ideas and messages.

**PE-2 *Post Educational Material to Website.*** Dallas is utilizing their website to provide educational information to the public. The stormwater tab contains information pages for mercury, temperature, and bacteria. There are 2 brochures, a resource link for teachers, and links for 1200-C permit resources.

**PE-3 *Participate in Local Event.*** The City of Dallas hosts an annual event in the summer called Krazy Days. Community activities, booths, and vendors encourage residents to come out and join the festivities.

The City utilized Krazy Days, held on 7/27/23, to provide TMDL and environmental material to the public. The City booth had stormwater based brochures, promotional items, [Take Action Towards Clean Streams | Dallas Oregon](#), and educational material from the Polk County Soil and Water Conservation District (SWCD). Krazy Days is a well established Dallas event, and well attended, but personnel said it was hard to attract people to the booth. A resolution to this situation might be to give more energy toward an activity that will generate interest.

**PE-4 *Education for Students.*** As was discussed earlier in this report, the City has done commendable work on this BMP. Staff participated in the Whitworth Elementary School Outdoor School held on May 31, 2023. Attendance included 170 5<sup>th</sup> graders. Instruction included a rotation type format, 50 minutes per station.

**PE-5 *Property Owner Mailing.*** The property owner mailing list was developed in 2022/2023 with 252 properties identified to receive material. The educational material to be sent out will include information that addresses the 3 pollutants of concern. Resources that address temperature will include resources for native plants, and the importance of tree retention.

**PE-6 *Partner Regionally*** City staff has actively sought out other agencies to build partnerships and increase water quality minded activities including the cities of Monmouth and Falls City. These relationships will serve the City well for program resources in the future.

Polk County Soil and Water Conservation District (SWCD) provided educational material for Krazy Days on 7/27/23. In addition, the SWCD will be hosting a free Rickreall Creek Symposium on 11/4/23 that staff will participate in. The audience will primarily be property owners adjacent to the creek.

PE-7 *Pet Waste Stations* The Dallas pet waste stations are monitored and refilled as part of weekly rotations.

The 2022 City of Dallas TMDL Implementation Plan includes a discussion in subsection 3.1 which refers to the need to reach target audiences with public education messages about reducing pollutants, including mercury in local waterways. The following list specifies the Dallas target audiences and outreach efforts for the report year.

The Dallas TMDL Implementation Plan includes an effort to provide educational material to people that live and do business within the community. While staff has done a good job of having a variety of education material available, more effort needs to be directed toward reaching target audiences specifically. The City will work to refine messages in the upcoming permit year.

Target Audiences for the City of Dallas 2022/2023

- General Public** – The website has various resources for the general public.
- Students / School Children** – Participation at the Outdoor School for 5<sup>th</sup> graders from Whitworth Elementary School
- Businesses**
- Industries**
- Landscapers** – Online brochure with landscaping BMPs, OSU native plants list and DEQs Green Lawn website link.
- Developers/Builders/Engineers** – Online brochure, mercury information, DEQ 1200-C links
- Elected Officials / City Staff** – City Council presentation on 11/22/22. Public Works Advisory Committee presentations held on 06/26/23, and on 10/23/23.

**Section 4 – Public Involvement (PI)**

**4.1 Overview**

The City has completed the BMPs in public involvement for mercury, temperature, and bacteria assigned for the review period.

**4.2 BMP Accomplishments/Discussion**

**PI-1 *Maintain the Website.*** The City’s TMDL Implementation Plan is posted on the website. This annual report will be posted as well.

**PI-2 *Presentation to City Council.*** The Mayor and City Council members had an opportunity to review the implementation plan and view a presentation on 11/22/22. A presentation was also held for the Public Works Advisory Committee on June 26, 2023 to discuss the implementation plan, and to introduce the Illicit Discharge program requirements. Presentations cover the three pollutants of concern.

**PI-3** *Mark Catch Basins.* Staff has connected with a local Girl Scout group for a storm drain marking project. Staff met with the troop leader on 3/13/23 and on 7/20/23 to coordinate the project.

The City will be using the metal medallions. The installation date is pending.



## Section 5 – Illicit Discharge Detection and Elimination (ID)

### 5.1 Overview

The City of Dallas has addressed all illicit discharge BMPs for the report year. All pollutants of concern have been addressed in City activities. BMP progress is discussed in Section 4.2

### 5.2 Accomplishments/Discussion

**ID-1** *GIS Updates.* The City is actively utilizing their GIS program and have made good progress updating assets for the stormwater system. The GIS technician has updated existing stormwater layers and was most recently adding as-built data to the system. Existing data includes such as storm lines, outfalls, detention basins, and the like.

**ID-2** *Ordinance.* Completion of the City's Illicit Discharge Ordinance is scheduled to be completed in 2024. In preparation for ordinance development staff has reviewed MS4 Phase II ordinances from other municipalities in Oregon. Staff has also developed a path forward by utilizing the Public Works Advisory Committee to review the ordinance for presentation to City Council. A presentation was held in June 2023 to give the committee an overview of the TMDL Program and requirements to be addressed through the illicit discharge control measure. A second presentation is being held on October 23, 2023. Barring setbacks, staff anticipate that the new ordinance will be complete and ready to review by Dallas City Council in late 2024.

**ID-3** *Enforcement Response Plan.* The enforcement components of the illicit discharge requirements have been reviewed by staff. The enforcement response procedure is to be completed in conjunction with development of the illicit discharge ordinance. The enforcement response activities and requirements are to be utilized with construction site runoff, if possible, in order to provide just one process for staff to follow.

ID-4 *Annual Training.* Staff training has been held when suitable during the report year, but a comprehensive training was held on August 31, 2023. This training was a multi-agency event directed specifically toward Public Works maintenance personnel. Topics covered included required elements of the program, non-stormwater discharges, spill response, coordination with police and fire, emergency response, the use of spill kits, and additional training opportunities.

ID-5 *Recordkeeping.* Staff is currently conducting recordkeeping using spreadsheet software, but they are quickly transitioning to GIS.

ID-6 *Outfall Inspections.* The City made good progress on outfall inspection work in 2022/2023. Staff worked to develop a useful numeric system for the structures including a process for adding or subtracting structures moving forward. The City has developed a tentative plan for dry weather sampling as well.



*Upstream of the Aquatic Center on Rickreall*

Not all City outfalls were inspected in 2022/2023, but a total of 29 out of 136, or aprx. 21%, were field verified. The information collected was added to GIS. In subsequent years, the City intends to inspect at least 40% of outfalls. Inspections will be completed at high priority locations and an inspection plan will be developed and discussed in the 2023/2024 yearly review document.

## **Section 6 – Construction Site Runoff Control (CS)**

### **6.1 Overview**

Progress has been made on implementation of this control measure. Staff has obtained CESCL certification, and is actively engaging the development community with education and erosion control material from the 1200-C permit. Staff has taken on inspection work as well.



## 6.2 Accomplishments/Discussion

**CS-1 1200-C Requirement.** A brochure has been developed to give to developers/builders with BMPs, DEQ resources, and a check-off list directed toward erosion control. The City also has DEQ resources on the website. [Managing Soil Runoff | Dallas Oregon](#) Dallas has links posted on the website for 1200-C information through DEQ.

**CS-2 Ordinance** Very little progress, other than planning, has occurred for this BMP. Staff is actively inspecting development sites, and understands the benefit of having a local program. Some work will be conducted on this BMP in conjunction with the ID ordinance development in 2024

**CS-3 Enforcement Response Plan** The City has not yet developed an enforcement response plan for this control measure, but the Environmental and Field Inspection Technician is actively conducting and tracking inspections. Inspection work commenced in July 2023. All sites are inspected at least weekly. Having obtained the CESCL certification has been very beneficial in providing resources to the development community. The completed plan will be developed in conjunction with ordinance development.

**CS-4 Tracking System** Staff has made use of an Excel type spreadsheet for tracking construction site activities during the reporting period.

**CS-5 Training** The City has made good progress on training as it applies to construction site runoff. Staff has reviewed and studied the 1200-C permit, and is actively providing appropriate guidance to the development community. CECSL certification was obtained by the Environmental and Field Inspection Technician on 2/16/23. In addition, Marion County hosted an erosion control field training in March 2023 that Dallas attended. Finally, a multi-agency training was held on August 31, 2023 that addressed such topic as plan review, Your DEQ Online (YDO), 1200-C regulations, and construction site program development. This training was hosted by the City's consultant and Nathan Hardebeck from Clean Water Team Training (CWT).

## Section 7 - Post-Construction Site Runoff Control in New and Re-development (PC)

### 7.1 Overview

Only minor progress on this control was made over the report year, with more emphasis being placed on illicit discharge and construction site runoff. The City has employed some LID facilities within Dallas, but more work in this area will need to be addressed.



Downtown – City of Dallas

### 7.2 BMP Accomplishments/Discussion

**PC-1 Ordinance/Design Standards** A Stormwater Master Plan was developed in 2016. This document should allow for a more trouble-free transition to the revision of the City's Design Standards needed to meet the conditions of this control measure.

**PC-2 Use of UICs** The use of UICs has been explored and will become an option worth more consideration moving forward. Dallas does not have ideal soils for infiltration and viable options are limited. The City will need to use creative approaches on projects. New technologies will need to be explored.

**PC-3 Inspection and Maintenance** Inspection and maintenance has been discussed with staff although no recordable activity for this control measure has been conducted. Personnel will utilize recordkeeping procedures from other organizations to serve as initial tools for this BMP.

**PC-4 *Develop an Inventory*** As was noted in the overview of this section, Dallas has installed some post-construction facilities within the City. Some facilities may need to be retrofitted to function properly. As the City works toward development of an inventory, existing facilities can be categorized for future action.

**PC-5 *Training*** A multi-agency training was held on August 31, 2023. This training covered pre-development conditions, design considerations for successful facilities, requirements for this control measure, a discussion of long-term maintenance, and developing a facility inventory. The training included personnel from Dallas, Monmouth, Polk County, Willamina, Yamhill County, Falls City, and Dayton.

**PC-6 *Recordkeeping*** Very little recordkeeping has occurred for this BMP although existing structural stormwater controls are being added to GIS as a result of as-built review.

## **Section 8 – Good Housekeeping (GH)**

### **8.1 Overview**

The City of Dallas has had good housekeeping practices in place for many years. Revision of the TMDL Implementation Plan will allow staff the opportunity to review practices and revise activities as needed. The City anticipates that this control measure will continue to evolve as personnel become more involved in problem solving.



## 8.2 BMP Accomplishments/Discussion

**GH-1 *Good Housekeeping Manual*** A final draft good-housekeeping manual was developed over the review period. The manual is in a easy-to-use format in order to encourage use by staff. Categories of activity (ie, excavation, vehicle washing, catchbasin cleaning, etc) include suitable BMPs, inspection schedule, and recordkeeping forms.

**GH-2 *Inspections*** Inspection practices are listed in the Good Housekeeping Manual. Inspection work is scheduled to commence in 2023/2024.

**GH-3 *Street Sweeping*** Street sweeping is an ongoing activity in Dallas. The City began tracking removal yards on January 5, 2023. Starting in 2023, the City began tracking by cubic yard for removal totals.

*Table 8.2 Street Sweeping*

<b>Month</b>	<b>Cubic Yards</b>
January	35.07
February	37.02
March	52.76
April	9.68
May	35.63
June	6.41
July	13.45
August	15.99
September	9.20
<b>Total</b>	<b>215.21</b>

Reviewing the data for this first recordkeeping effort indicates low totals removed in both April and September. As recordkeeping continues, the recorded totals are expected to produce trends that can be used to evaluate anomalies in subsequent years.

**GH-4 *Catch Basin Cleaning*** 988 catch basins were cleaned during the report year, which is 42% of the inventory total of 2340 structures.





While the goal of cleaning 50% was not reached, staff made significant progress in recordkeeping and gathering asset information. The 50% total is expected to be reached in subsequent review periods.

The new Good Housekeeping Manual includes BMPs for this work and also notes potential programs the City might look to in the future for storm line maintenance and replacements.

*GH-5 Training* A multi-agency training was held on August 31, 2023. This training covered rationale for recordkeeping, refining operation activities, and handouts were offered for catch basin and storm pipe cleaning. The training included personnel from Dallas, Monmouth, Polk County, Willamina, Yamhill County, Falls City, and Dayton.

## **Section 9    Public Education Evaluation**

The TMDL WQMP specifies that the DMA must include an assessment in the annual report that discusses progress toward implementation of the Public Education Program including an evaluation of at least one activity during the review period.

As discussed in Section 3, the City has made good progress in regard to public education, but staff needs to put more effort towards programmatic activities.

Staff participation in the Outdoor School was very beneficial for students and for staff that acted as instructors. Given positive feedback from the school, this event will likely continue to occur on an annual basis. Staff will likely make good use of this opportunity to reach school aged children.



*Outdoor School – Macroinvertebrate Identification*

The City has explored public outreach at community events such as Krazy Days which is held annually in July. For the summer event in 2023, staff used handouts and brochures for the event, and partnered with the Polk County Soil and Water Conservation District. The booth was the no-flash version of a local government booth.

In 2023 the results of getting the message to the community were less than encouraging. While the reasoning for utilizing this opportunity was sound, there were take-aways that can be used for future event planning. Staff will have to plan in advance to provide an opportunity that will draw the public in. Prizes, promotional items, educational activities, and positive messaging may be components to consider in the future for taking advantage of the large crowds drawn to the event. Utilizing this event in a more creative manner in the future holds promise.

Finally, the City will need to do a better job of utilizing their website for stormwater education, with material available for each target audience.

## **Section 10 – Program Monitoring / Adaptive Management**

### **10.1 Program Monitoring**

The City is implementing the TMDL program without any major short-comings or noteworthy flaws. During this review year Dallas has made noteworthy strides with the addition of new staff, preparations for illicit discharge program development, GIS development, and much more.

The 6 minimum control measures are being addressed through the City's program. BMPs and associated timelines seem reasonable and staff does not anticipate delays at this point. Public education, public involvement, and good housekeeping are on target for most activities, with only refinement measures being needed for 2023/2024. Illicit discharge detection, which acts as the foundation for the stormwater program has been discussed and planned for throughout the year, with involvement from elected officials. Ordinance work will be moving forward in 2023/2024. The use of the Public Works Advisory Committee to introduce the ordinance to the City Council was intended to assist with a smooth transition into adoption. The City does have the ability to impose fines now.

Construction site runoff ordinance development will commence in the latter part of the upcoming report year, on the heels of illicit discharge ordinance development. Staff has obtained valuable certification and training during the year. They are actively providing regular guidance to the development community that is consistent with 1200-C permitting.

Post Construction is the single control measure that has not received a great deal of attention during the report year. BMPs for this measure have been slightly adjusted in order to make certain that adequate progress occurs in 2023/2024. Training has occurred for municipal staff.

### **10.2 Adaptive Management**

Dallas has utilized the preparation time for the annual report to fine-tune the TMDL Program. As was noted in subsection 1.3, Attachment B shows changes to the matrix with new language shown in red text, and text being removed as a strikeout. Some minor formatting was completed as well which is noted in red text. For the most part, the BMPs

are producing the outcomes intended with few exceptions. The majority of any changes made were intended to clarify intent of the BMP.

BMP PC-2, has been removed and will be replaced with a new PC-2 in the matrix. The use of UICs is not appropriate at this time. Soil surveys indicate the City has unsuitable soil in many developable parts of the community. The use of UICs should be considered as the stormwater and post-construction elements of facility management grows. There exists a potential to use these features, but adding the task isn't warranted at this time.

BMP PC-2 has been replaced with a new BMP-2 for the post-construction control measure. The City will develop a long-term maintenance plan in 2023/2024. This plan is intended to prepare PW staff for the maintenance and function needs of these facilities. It will also spell out an appropriated timeline which will put Dallas in the position of meeting their goals. This new BMP is similar to BMP PC-3, but they are intended to be separate tasks. PC-2 calls for the plan which will discuss how PC facilities are assessed in regard to function. PC3 is development of the materials that will be utilized in the field to collect data for further action. Unfortunately there was a typographical error in the post-construction BMPs in the original plan. That has been corrected and the accurate numbering and language is provided in Appendix C, the Report Year 2 matrix.

Two new BMPs have been added to the temperature portion of the matrix; ID-7 and ID-8. These BMPs were added in response to the pending temperature

## **Section 11 – Projections for 2023/2024**

### **11.1 Temperature**

The TMDL Temperature Replacement requirements are on the horizon and Dallas is looking at potential implications for the City. Although the City has not received notice of required implementation revisions from DEQ, the City recognizes the amount of work that will be required for this action. As requested by DEQ in the 5<sup>th</sup> Year Evaluation approval letter, Dallas is adding temperature BMPs. The matrix in Appendix B shows the addition of 2 BMPs which are directed toward assessing information gathered for the City's Local Wetland Inventory (LWI). That information will be useful for planning channel modification work and more. In addition, the property owner mailing which is scheduled to be mailed in 2023/2024 will include more information about tree and native plant retention than was originally intended.

A BMP for the revision of the implementation plan has been added to Management Activities at the end of the matrix. The revision work was added to the matrix to make certain that this activity remains on the radar for City staff moving forward.

### **11.2 Closing Summary**

Dallas is now implementing their TMDL program in a productive and useful way. BMPs have been fine-tuned, GIS is being utilized, additional staffing has been acquired, and major program development is occurring for illicit discharge detection and elimination. The City has had some stumbling blocks in the past, but those have been eliminated and the future looks promising.

While the implementation plan has been in place for many years, the City is looking at their obligations with new eyes and a new mindset.

**BMP Status 2022/2023**

*(The table does not include modifications to BMPs for report year 2023/2024)*

<b>BMP</b>	<b>Description</b>	<b>Complete Y/N</b>
PE-1	Develop a resource portfolio of outreach messages for the identified target audiences.	Yes
PE-2	Post relevant stormwater public education materials to the City's website.	Yes 2022/2023
PE-3	Participate in Krazy Days and/or other local events.	Yes 2022/2023
PE-4	Provide educational opportunities and material for students.	Yes 2022/2023
PE-5	Mail informational letter to streamside property owners 2x during the 5 year term	Progress in 2022/2023
PE-6	Partner with local watershed council, SWCD, university, etc	Yes 2022/2023
PE-7	Maintain pet waste stations	Yes 2022/2023
PI-1	Maintain a website to post the most current environmental educational information	Yes 2022/2023
PI-2	Annual presentation to City Council	Yes 2022/2023
PI-3	Utilize community groups to mark catch basins and include an educational element	Progress 2022/2023
ID-1	Update the City's GIS system to include new stormwater data	Yes 2022/2023
ID-2	Develop an ordinance that prohibits non-stormwater discharges into the stormwater system	Progress in 2022/2023
ID-3	Develop and enforce an escalating and response procedure to include construction sites, illegal dumping and illegal connections.	No
ID-4	Annual staff training	Yes 2022/2023
ID-5	Recordkeeping including response to complaint accounting	Progress in 2022/2023
ID-6	Conduct annual outfall inspections	Yes
CS-1	Coordinate with the development community regarding the need for a 1200-C permit and a City ECSP Plan	Yes 2022/2023
CS-2	Develop an Erosion Control Ordinance which includes DEQ requirements	Progress in 2022/2023
CS-3	Develop and enforce an escalating and response procedure to include qualifying construction sites	No
CS-4	Develop a tracking system	Yes 2022/2023
CS-5	Send selected personnel to CESCL training and annual training for PW person	Yes 2022/2023
PC-1	Develop an ordinance or other regulatory mechanism such as design standards to meet the post-construction requirements	No
PC-2	Evaluate the use of UICs in areas where stormwater cannot be infiltrated	Yes 2022.2023
PC-3	Develop inspection and maintenance requirements for publically owned property	No
PC-4	Develop an inventory of private and public facilities	Progress 2022/2023
PC-5	Staff training	Yes
PC-6	Recordkeeping	Progress in 2022/2023

## APPENDIX A – Annual Report 2022/2023

<b>GH-1</b>	Develop a Good Housekeeping Manual	Yes 2022/2023
<b>GH-2</b>	Monthly Inspections at Shop Facility	Progress in 2022/2023
<b>GH-3</b>	Street Sweeping	Yes 2022/2023
<b>GH-4</b>	Catchbasin Cleaning	Yes 2022/2023
<b>GH-5</b>	Annual training	Yes 2022/2023
	Develop a sustainable stormwater fee	Progress in 2022/2023
	Develop a Stormwater Management Plan (SWMP)	Progress in 2022/2023
	Complete annual reports	Yes 2022/2023
	Evaluate public education activities according to WQMP	Yes 2022/2023
	Annually evaluate implementation efforts and program progress (monitoring)	Yes 2022/2023
	Complete 5 <sup>th</sup> Year Assessment and Evaluation (for 2018)	Yes 2022/2023

**City of Dallas  
TMDL IMPLEMENTATION PLAN MATRIX 2022 – 2027  
Review period June 15, 2022 to Sept. 30, 2023**

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
<b>POLLUTANT: Mercury</b>								
<b>MCM #1 Public Outreach</b>								
PE-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Develop a resource portfolio of outreach messages for the identified target audiences.	<del>Resources to be developed by knowledgeable persons to reach target audiences</del> Update portfolio annually	Work to be completed by consultant	Report updates in annual report	2023/2 Ongoing annually	Develop program foundation with focused approach. Annually update portfolio	Brochures, resource lists, social media content, handouts, and the like were developed. The material includes mercury specific information.. <b>BMP COMPLETE</b>
PE-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	Post relevant stormwater public education materials to the City's website.	<del>Utilize material from portfolio to make FAQ sheets, brochures, etc</del> Add new information to the website and refine	Staff	Document materials and topics covered annually and discuss in annual report	Ongoing annually	<del>Completion of multiple documents on the website for the public to access.</del> Update routinely Focus on target audiences and program development	<b>Development</b> – brochure and 1200-C info. <b>Landscapers</b> – OSU native plant list, Green Lawns link <b>Residents</b> – Brochure and links on website <b>Businesses</b> – Information in brochure on website
PE-3	Runoff from soil disturbance and direct discharge to waterway from riparian area	Participate in Crazy Days and/or other local events.	Host a booth or event and document materials	Small fund for display materials and incentive items	Document date of events and participation	Ongoing annually	Report number of materials handed out, date, and participation	Krazy Days event booth on 7/28/23 to 7/30/23. Handouts for kids, brochures for adults. Polk County shared the booth and had resource information as well. Krazy Days is an annual event and well attended,

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
PE-4	Discharge from unvegetated riparian area	Provide educational opportunities and material for students.	Presentation in classroom or field events at a local park, etc	Staff time and presentation needs	Document date, # of students, and content	Ongoing annually	Report specifics of event including date, material covered, etc	Staff assisted and helped with development of an Outdoor School held from 5/31/23 to 6/2/23. Aprx. 170 5 <sup>th</sup> graders from Whitworth Elementary. 50 minute rotation presentations such as micros, water quality, habitat, etc.
PE-5	Runoff from soil disturbance and direct discharge to waterway from riparian area	Mail informational letter to streamside property owners 2x during the 5 year term	Letters will cover streamside responsibilities and BMPs	Staff time and mailing cost	<del>Complete mailing list in 2022/2023</del> Update mailing list	2023/24 and 2025/26	<del>Maintain records of how many recipients and copy of the letters</del> First mailing in 23/24	Mailing list has been developed. 252 property owners have been identified to receive direct outreach
PE-6	Runoff from soil disturbance and direct discharge to waterway from riparian area	Partner with local watershed council, SWCD, university, etc	<del>Provide financial support or other incentives for environmental activities in Dallas</del> Work together on joint activities for local benefit	<del>Tbd — agreement should be reached with the applicable group</del> Staff time and minimal cost for supplies	Report annual progress in yearly report	Ongoing annually	Document progress annually	The City partnered with the Polk Co. SWCD for Krazy Days, and the Stream Symposium to be held on 11/04/23. Dallas is also routinely communicating with the City of Monmouth.
<b>MCM #2 Public Involvement</b>								
PI-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Maintain a website to post the most current environmental educational information	Post the TMDL Plan, revisions, and annual reports on City website with educational material	Staff time	Post the plan in 2022 and post plan reports submitted to DEQ annually	To occur <b>each year</b> starting in 2022	Post new and updated material annually and report	The website has been updated to include 1200-C resources and links, a development based brochure, and an article regarding mercury in fish.



<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
PI-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	Annual presentation to City Council	Work Session presentation	Consultant and staff	Report progress in yearly report	To occur each year starting in 2022/2023	Content and date to be included in annual report	City Council meeting held on 11/22/22. Councilors had good questions and general interest in the program.
PI-3	Runoff from soil disturbance and illicit discharges	Utilize community groups to mark catch basins and include an educational element	Utilize community groups to mark a number of basins each year	Budget for placards, and misc. costs for adhesive, kits, etc.	Track number of basins marked and report annually	To occur <b>each year</b> starting in 2024	Track number of markers installed, dates, and volunteers	<b>In progress</b> - Arrangements have been finalized for the first project with a Girl Scout troop. Medallions have been selected. GIS maps will be used to identify catchbasins
<b>MCM #3 Illicit Discharge Detection and Elimination</b>								
ID-1	Runoff from soil disturbance and impervious area	Update the City's GIS system to include new stormwater data	Review WQMP to meet DEQ requirements	Staff time	Document annual updates	To occur <b>each year</b> starting in 2022/2023	Track annual assets (ie. outfalls, catchbasins, etc)	Stormwater asset inventory is in progress. Outfalls have been added to GIS, as-built data, storm lines, manholes, etc. Mobile application has been developed for field personnel. The City has made good progress on this BMP
ID-2	Runoff from soil disturbance and impervious area	Develop an ordinance that prohibits non-stormwater discharges into the stormwater system	Utilize ordinances and programs from other agencies	Staff time involving legal	Provide DEQ annual progress on this BMP in the annual report	Complete by 2024/2025	Document annual activities	<b>In progress</b> - Ordinances from other cities are being reviewed for suitability. Discussions have been had on what a stormwater ordinance would include. Presentation to PW Committee on 6/26/23 which includes Illicit Discharge regulations and next steps. Ordinance discussion on 10/23/23 w/ PW Committee

BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when. Measure success</i>	Status
ID-3	Runoff from soil disturbance and impervious area	Develop and enforce an escalating and response procedure	The plan will include escalating steps of enforcement	Staff time	Report progress and final to DEQ	Complete by 2025/2026 2024/2025	Document annual activities	<i>No useful progress has occurred on this BMP. The enforcement plan will be completed in conjunction with ordinance development</i>
ID-4	Runoff from soil disturbance and impervious area	Annual staff training	Annual training by existing staff. Take advantage of inexpensive regional training	Include training in the annual budget	Report training date, # of employees in attendance	To occur <b>each year</b> starting in 2022/2023	Conduct annual training – develop a schedule. Yr 1 training by consultant	Training on 8/31/23 with other Polk and Yamhill county agencies. Training facilitated by E and S Consulting and CWT Training. Topics ID, CS, PC, GH, and regulatory
ID-5	Runoff from soil disturbance and impervious area	Recordkeeping including response to complaint accounting	Utilize GIS or another database to document response to calls and complaints	Staff time	Report # of complaints and outcome annually	To occur <b>each year</b> starting in 2022/2023	Develop a response process and tracking system. <b>Refine recordkeeping</b>	Staff is currently using an Excel spreadsheet for recordkeeping. GIS recordkeeping will be incorporated in the future. Staff has developed a form for responders to take information
ID-6	Runoff from soil disturbance and impervious area	Conduct annual outfall inspections	Field inspect outfalls and maintain inventory	Staff time	Report activities in annual report	To occur <b>each year</b> starting in 2023/2024	<del>Develop process and maintain digital inventory. Prepare for dry weather insp</del> <b>Complete field inspection work. Develop priority locations and identify in GIS. Develop annual screening plan</b>	The City has made good progress on this BMP. Staff has developed asset identification, a form for dry weather inspection work. The outfall inventory is 136 structures. 29 were field verified in 2022/2023

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<b>MCM #4 Construction Site Runoff</b>								
CS-1	Runoff from soil disturbance and impervious area	Coordinate with the development community regarding the need for a 1200-C permit and a ESCP Plan	Provide materials on the website and conduct site visits	Staff time	Report progress in yearly report	Ongoing to commence in 2023	<del>Develop a flyer for builders/developers. Use in field and post on website.</del> Track referrals to DEQ.	Brochure completed March 2023. It has been distributed in the field and at Krazy Days. It is also posted on the website.
CS-2	Runoff from soil disturbance and impervious area	Develop an Erosion Control Ordinance which includes DEQ requirements	Ordinance and document need to be consistent with 1200-C and 1200-CN programs	Staff time	Document annual progress	2025/2026	Report progress in each annual report	<b>In progress</b> - Staff has obtained CESCL certification and regulatory training for this BMP so they are able to understand what will be needed.
CS-3	Runoff from soil disturbance and impervious area	Develop and enforce an escalating and response procedure to include qualifying construction sites	The response procedure will be linked to a process that applies to the ID, PC portions of the plan	Staff time	Report progress in annual report	2023/2024	Education will be emphasized prior to ordinance development. Develop draft	<i>No significant progress has been made on this BMP. Enforcement response will be addressed within the illicit discharge program development</i>
CS-4	Runoff from soil disturbance and impervious area	Develop a tracking system	Will seek to eventually tie this process to GIS	Staff time	Report progress in annual report	2023/2024	Maintain annual tracking data	Staff is currently using an Excel spreadsheet for recordkeeping efforts. The City is working toward utilizing GIS in the future.

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CS-5	Runoff from soil disturbance and impervious area	Send selected personnel to CESCL training and annual training for PW personnel	Utilize resources for local training	Training fees included in budget	Report training and recertification dates	2023/2024	Obtain training City will track new certification and renewal activities. Document other training activities	CESCL certification obtained. Field training at Marion County. Training on 8/31/23 with other Polk and Yamhill county agencies. Training facilitated by E and S Consulting and CWT Training. Topics ID, CS, PC, GH, and regulatory <b>COMPLETE</b>
<b>MCM #5 Post-Construction Runoff Control for New and Redevelopment</b>								
PC-1	Runoff from soil disturbance and impervious area	Develop an ordinance or other regulatory mechanism such as design standards to meet the post-construction requirements	Utilize DEQ resources and mirror what other municipalities have done.	Staff time – potential for engineering costs	Document progress annually	Complete by 2025/2026	Describe progress in the annual report	<i>No significant progress has occurred on this BMP</i>
PC-2	Runoff from soil disturbance and impervious area	Evaluate the use of UICs in areas where stormwater cannot be infiltrated	Utilize engineering reports, soil surveys, field studies	Consulting cost	Report path forward in yearly report	2023/2024	Review regulatory language and soil data to determine feasibility	The consultant has reviewed UIC regulations and potential opportunities for Dallas. At this point it appears that use of UICs would be limited. The City will look for additional opportunities as the Post-Construction program is developed <b>BMP COMPLETE</b>

BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when. Measure success</i>	Status
PC-2	Runoff from soil disturbance and impervious area	Develop long-term operations and maintenance plan	The plan should include actions for failing, abandoned, and needed maintenance	Staff time	Report annual progress	2023/2024	Develop a plan and document activities	<b>NEW</b>
PC-3	Runoff from soil disturbance and impervious area	Develop inspection and maintenance requirements materials for private and publically owned property	The plan should include a checklist for inspections	Staff time	Report annual progress	2024/2025	Add maintenance plan and protocol to GH manual	<i>No significant progress has occurred on this BMP</i>
PC-4	Runoff from soil disturbance and impervious area	Develop an inventory of private and public facilities	Review as-builts, field verify, etc	Staff time	Describe progress in the annual report	Complete by 2024/2025	Inventory shall include owner, installation date, type, etc.	Some work has occurred on this BMP, but primarily from the addition of facilities identified on as-builts through GIS work.
PC-5	Runoff from soil disturbance and impervious area	Staff training	Annual staff training for involved personnel	Cost of training	Report annual training activities	Ongoing starting in 2022/2023	Consultant to facilitate Year 1 training	Training on 8/31/23 with other Polk and Yamhill county agencies. Training facilitated by E and S Consulting and CWT Training. Topics ID, CS, PC, GH, and regulatory
PC-6	Runoff from soil disturbance and impervious area	Recordkeeping	Track facilities, ownership, age, type, etc	Staff time	Report annual activities	Ongoing starting in 2023/2024	Inventory existing facilities in 2023/2024	<b>In progress</b> – some inventory information has been collected although limited. Facilities available from as-builts are/will be added to the GIS database.

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<b>MCM #6 Good Housekeeping in Municipal Operations</b>								
GH-1	Pollution from municipal operations	Develop a Good Housekeeping Manual	The manual is a reference guide for operations personnel	Staff time w/ Consultant	Describe progress in the annual report	<del>Complete by 2022/2023</del> Revise by 2023/2024	Complete manual. Staff to review and make revisions in 2023/2024	The Good Housekeeping Manual is in final draft form. It needs to be reviewed by Operations personnel for any adjustments
GH-2	Pollution from municipal operations	Monthly Inspections at Shop Facility	Inspections will occur according to Good Housekeeping Manual in Yr 2	Staff time	Provide completion date and documentation for inspections to DEQ	Conduct inspections starting in 2023/2024	Conduct inspections according to the manual	Inspections will commence when the manual has been approved. The manual includes inspection schedule.
GH-3	Pollution from municipal operations	Street Sweeping	Continue street sweeping activities	Staff time	Provide annual activities in annual report	To occur <b>each year</b> starting in 2023	Evaluate practices to improve effort. Record quarterly removal totals	A total of 215.21 cubic yards were removed from City streets since tracking commenced in Jan. 2023
GH-4	Pollution from municipal operations	Catchbasin Cleaning	Continue catchbasin cleaning – clean 50% of total annually	Staff time	Evaluate practices to improve effort	To occur <b>each year</b> starting in 2023	Provide annual activities in annual report	The City has a catch basin inventory of 2340 structures. 988 were cleaned during the reporting period. 42% of the City's catch basins were cleaned during the reporting year.
. GH-5	Pollution from municipal operations	Annual training	Utilize consultant for initial training	Consultant	Record date, content, and employees	To occur <b>each year</b> starting in 2023	Describe progress in the annual report	Training on 8/31/23 with other Polk and Yamhill county agencies. Training facilitated by E and S Consulting and CWT Training. Topics ID, CS, PC, GH, and regulatory

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<b>POLLUTANT: Temperature</b>								
<b>MCM #1 Public Education</b>								
PE-1	Sediment loading and lack of shade	Develop a resource portfolio of outreach messages for the 5 year evaluation period	Resources to be developed by knowledgeable persons	Work to be completed by consultant	Report updates in annual report	2022 2024/2025	Develop program foundation with focused approach <b>Develop additional specific temperature education material</b>	Brochures, resource lists, social media content, handouts, and the like were developed. The material includes temperature specific information. <b>BMP COMPLETE</b>
PE-4	Discharge from unvegetated riparian area	Provide educational opportunities and material for students.	Presentation in classroom or field events at a local park, etc	Staff time and presentation needs	Document date, # of students, and content	Ongoing annually	Report specifics of event including date, material covered, etc	Staff assisted and helped with development of an Outdoor School held from 5/31/23 to 6/2/23. Aprx. 170 5 <sup>th</sup> graders from Whitworth Elementary. 50 minute rotation presentations such as micros, water quality, habitat, etc.
PE-5	Runoff from soil disturbance and direct discharge to waterway from riparian area	Mail informational letter to streamside property owners 2x during the 5 year term	Letters will cover streamside responsibilities and BMPs	Staff time and mailing cost	<del>Complete mailing list in 2022/2023</del> <b>Update mailing list for second notice</b>	2023/24 and 2025/26	<del>Maintain records of how many recipients and copy of the letters</del> <b>First mailing in 23/24 will include temperature educational topics.</b>	Mailing list has been developed. 252 property owners have been identified to receive direct outreach

BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when. Measure success</i>	Status
<b>MCM #2 Public Involvement</b>								
PI-1	Sediment loading and lack of shade	Maintain a website to post the most current environmental educational information	Post the TMDL Plan on the City website with educational material	Staff time	Post the plan in 2022 and post plan reports submitted to DEQ annually	To occur <b>each year</b> starting in 2022	Post new and updated material annually and report	Implementation Plan and overview is posted on the website. The website has been updated to make stormwater material easier to find. The Annual Report for Year 1 will be posted as well
PI-2	Sediment loading and lack of shade	Annual presentation to City Council	Work Session presentation	Consultant and staff	Report progress in yearly report	To occur <b>each year</b> starting in 2022/2023	Content and date to be included in annual report	City Council meeting held on 11/21/22. Councilors had good questions and general interest in the program. The City anticipates a Council presentation in 2023/2024.
PI-3	Sediment loading and lack of shade	Utilize community groups to mark catch basins	Utilize community groups to mark a number of basins each year	Budget for placards, and misc. costs for adhesive, kits, etc.	Track number of basins marked and report annually	To occur <b>each year</b> starting in 2024	Track number of markers installed, dates, and volunteers	<b>In progress</b> - Arrangements have been finalized for the first project with a Girl Scout troop. Medallions have been selected. GIS maps will be used to identify catchbasins
<b>MCM #3 Illicit Discharge Detection and Elimination</b>								
ID-1	Sediment loading and lack of shade	Update the City's GIS system to include new stormwater data <b>Add water rights data and well data from OWRD</b>	Review WQMP to meet DEQ requirements	Staff time	Document annual updates	To occur <b>each year</b> starting in 2022/2023	Track annual assets (ie. outfalls, catchbasins, etc)	Stormwater asset inventory is in progress. Outfalls have been added to GIS, as-built data, storm lines, manholes, etc. Mobile application has been developed for field personnel. The City has made good progress on this BMP



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ID-2	Sediment loading and lack of shade	Develop an ordinance that prohibits non-stormwater discharges into the stormwater system	Utilize ordinances and programs from other agencies <b>and include prohibition of some activities that involve using heated water</b>	Staff time involving legal	Provide DEQ annual progress on this BMP in the annual report	Complete by 2024/2025	Document annual activities. Use Phase II as guidance.	<i>Ordinances from other cities are being reviewed for suitability. Discussions have been had on what a stormwater ordinance would include and laying out the regulations for a stormwater utility. PW Advisory Committee meeting on 6/26/23 was an introduction to the TMDL plan and illicit discharge program.</i>
ID-3	(See CS-3)	Develop and enforce an escalating and response procedure to include construction sites, illegal dumping and illegal connections.	The plan will include escalating steps of enforcement	Staff time	Report progress and final to DEQ	Complete by 2024/2025	Document annual activities	<i>No useful progress has occurred on this BMP. The enforcement plan will be completed in conjunction with ordinance development</i>
ID-4	Sediment loading and lack of shade	Annual staff training	Annual training by existing staff. Take advantage of inexpensive regional training when available	Include training in the annual budget	Report training date, # of employees in attendance	To occur <b>each year</b> starting in 2022/2023	Conduct annual training — <del>develop a schedule.</del> <b>Yr 1 training by consultant Record dates and content</b>	Training on 8/31/23 with other Polk and Yamhill county agencies. Training facilitated by E and S Consulting and CWT Training. Topics ID, CS, PC, GH, and regulatory. Mercury, temperature, and bacteria were discussed

BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when. Measure success</i>	Status
ID-7	Stream morphology, potential hydromodification	Add LWI to GIS	Utilize LWI maps to digitized in GIS	Existing budget	LWI data will be included in the City's GIS	2023/2024	Document progress	<b>NEW</b>
ID-8	Stream morphology, potential hydromodification	Assess wetlands using OFWAM or other assessment method	Use methodology approved by DSL	Consultant	Assessment to provide value ranking	2024/2025	Document progress	<b>NEW</b>
<b>MCM #4 Construction Site Runoff</b>								
CS-2	Sediment loading and lack of shade	Develop an Erosion Control Ordinance which includes DEQ requirements as well as retention of trees and native vegetation	Ordinance and document need to be consistent with 1200-C and 1200-CN programs	Staff time	Document annual progress	2025/2026	Report progress in each annual report	The training held on August 31, 23 included a discussion on temperature, shade effectiveness, and program requirements for TMDL agencies
CS-3	Sediment loading and lack of shade	Develop and enforce an escalating and response procedure to include qualifying construction sites	The response procedure will be linked to a process that applies to the ID, PC portions of the plan	Staff time	Report progress in annual report	2023/2024 2024/2025	Education will be emphasized prior to ordinance development. Develop draft	<i>No useful progress has occurred on this BMP. The enforcement plan will be completed in conjunction with ordinance development</i>
<b>MCM #5 Post Construction Runoff Control in New and Redevelopment</b>								
PC-1	Sediment loading and lack of shade	Develop an ordinance or other mechanism such as design standards to meet the PC regs	Utilize DEQ resources and mirror what other municipalities have done.	Staff time – potential for engineering costs	Document progress annually	Complete by 2025/2026	Describe progress in the annual report	<i>No useful progress has occurred on this BMP. The enforcement plan will be completed in conjunction with ordinance development</i>

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
<del>PC-3</del> PC-2	Sediment loading and lack of shade	Evaluate the use of UICs in areas where stormwater cannot be infiltrated	Utilize engineering reports, soil surveys, field studies	Consulting cost	Report annual progress	2024/2025	Add maintenance plan and protocol to GH manual	The consultant has reviewed UIC regulations and potential opportunities for Dallas. At this point it appears that use of UICs would be limited. The City will look for additional opportunities as the Post-Construction program is developed. <b>BMP COMPLETE</b>
PC-3	Sediment loading	Develop inspection and maintenance requirements for publically owned infiltration facilities property	The plan should include a checklist for inspections	Staff time	Report annual progress	2024/2025	Add maintenance plan and protocol to GH manual	<i>No significant progress has occurred on this BMP</i>
<del>PC-5</del> PC -4	Sediment loading and lack of shade	Develop an inventory of private and public facilities	Review as-builts, field verify, etc	Staff time	Describe progress and findings in the annual report	Complete by 2024/2025	Inventory shall include owner, installation date, type, etc.	Some work has occurred on this BMP, but primarily from the addition of facilities identified on as-builts through GIS work.
<del>PC-6</del> PC-5	Sediment loading and lack of shade	Staff training	Annual staff training for involved personnel	Cost of training	Report annual activities	Ongoing starting in 2023/2024	Inventory existing facilities in 2023/2024	Training on 8/31/23 with other Polk and Yamhill county agencies. Training facilitated by E and S Consulting and CWT Training. Topics ID, CS, PC, GH, and regulatory. Discussed principles of water cycle, development, and impacts on infiltration

BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when. Measure success</i>	Status
<b>MCM #6 Good Housekeeping in Municipal Operations</b>								
GH-1	Pollution from municipal operations	Develop a Good Housekeeping Manual	Include protocol for retention of trees and native vegetation along waterways	Staff time w/ Consultant	Complete manual	Complete by 2022/2023	Describe progress in the annual report	The Good Housekeeping Manual is in final draft form. It needs to be reviewed by Operations personnel for any adjustments
<b>POLLUTANT: Bacteria</b>								
<b>MCM # 1 Public Education</b>								
PE-1	Runoff from pervious surface, or illegal discharge	Develop a resource portfolio of outreach messages for the 5 year evaluation period	Resources to be developed by knowledgeable persons	Work to be completed by consultant	Report updates in annual report	2023/2 Ongoing annually	Develop program foundation with focused approach. <b>Annually update portfolio</b>	Brochures, resource lists, social media content, handouts, and the like were developed. The material includes bacteria specific information. <b>BMP COMPLETE</b>
PE-2	Runoff from pervious surface, or illegal discharge	Post relevant stormwater public education materials to the City's website.	Material in the form of FAQ sheets, articles, brochures, etc	Staff	Document materials and topics covered annually and discuss in annual report	Ongoing annually	Completion of multiple documents on the website for the public to access. Update routinely	<b>Development</b> – brochure and 1200-C info. <b>Landscapers</b> – OSU native plant list, Green Lawns link <b>Residents</b> – Brochure and links on website <b>Businesses</b> – Information in brochure on website

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
PE-3	Runoff from pervious surface, or illegal discharge	Participate in Crazy Days and/or other local events.	Host a booth or event and document materials	Small fund for display materials and incentive items	Document date of events and participation	Ongoing annually	Report number of materials handed out, date, and participation	Krazy Days event booth on 7/28/23 to 7/30/23. Handouts for kids, brochures for adults. Polk County shared the booth and had resource information as well. Krazy Days is an annual event and well attended,
PE-5	Runoff from pervious surface, or illegal discharge	Mail informational letter to streamside property owners 2x during the 5 year term	Letters should cover streamside responsibilities and BMPs	Staff time and mailing cost	Complete mailing list in 2022/2023	2023 and 2025	Maintain records of how many recipients and copy of the letters	Mailing list has been developed for mailing. 252 property owners have been identified to receive mailings
PE-7	Runoff from pervious surface, or illegal discharge	Maintain pet waste stations	Stock, install, and maintain pet waste stations	Maintain budget for this activity	Collect records of when stations are stocked	To occur <b>each year</b> starting in 2022/2023	Report yearly activity in annual report	Stations are being maintained on a regular basis. Bags are restocked weekly . The City has a map of pet waste stations.
<b>MCM #2 Public Involvement and Participation</b>								
PI-1	Runoff from pervious surface or degraded riparian area	Maintain a website to post the most current environmental educational information	Post the TMDL Imp Plan and other educational information	Staff time	Post new and updated material annually and report	To occur <b>each year</b> starting in 2022	Post the plan in 2022 and post plan reports submitted to DEQ annually	The website has been updated to include material that addresses the impacts of runoff such as brochures. The City also has included material and links specific to animal waste.

BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when. Measure success</i>	Status
PI-3	Runoff from pervious surface or degraded riparian area	Utilize community groups to mark catch basins	Utilize community groups to mark a number of basins each year	Budget for placards, and misc. costs for adhesive, kits, etc.	Track number of basins marked and report annually	To occur <b>each year</b> starting in 2024	Track number of markers installed, dates, and volunteer	<b>In Progress</b> .....Medallions have been identified and potential community groups are being considered. Mike is planning on utilizing a girl scout group for installation this summer
<b>MCM #3 Illicit Discharge Detection and Elimination</b>								
ID-2	Runoff from impervious area	Develop an ordinance that prohibits non-stormwater discharges	Develop a plan to meet the conditions of IDDE in 2022/2023	Staff time involving legal	Document annual progress	Complete by 2025/2026	Provide DEQ annual progress on this BMP in the annual report	Presentation shown to PW Committee regarding the IDDE control measure and path forward on 6/26/23
ID-3	Runoff from soil disturbance and impervious area	Develop an enforcement response plan	The plan will include escalating steps of enforcement	Staff time	Report progress and final to DEQ	Complete by 2025/2026	Document annual activities	<i>No useful progress has occurred on this BMP. The enforcement plan will be completed in conjunction with ordinance development</i>
ID-5	Runoff from soil disturbance and impervious area	Recordkeeping including response to complaint accounting	Utilize GIS or another database to document response to calls and complaints	Staff time	Report # of complaints and outcome annually	To occur <b>each year</b> starting in 2022/2023	Develop a response process and tracking system	Staff is currently using an Excel spreadsheet for recordkeeping. GIS recordkeeping will be incorporated in the future. Staff has developed a form for responders to take information
<b>MCM #4 Construction Site Runoff</b>								
CS-2	Runoff from soil disturbance and impervious area	Develop an Erosion Control Ordinance which includes DEQ requirements	Ordinance and document need to be consistent with 1200-C and/or 1200-CN	Staff time	Document annual progress	2025/2026	Report progress in each annual report	<b>In progress</b> - Staff has obtained CESCL certification, and regulatory training for this BMP so they are able to understand what will be needed.

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
CS-3	Runoff from soil disturbance and impervious area	Develop and enforce an escalating and response procedure to include qualifying construction sites	The response procedure will be linked to a process that applies to the ID, PC portions of the plan	Staff time	Report progress in annual report	2023/2024	Education will be emphasized prior to ordinance development. Develop draft	<i>No useful progress has occurred on this BMP. The enforcement plan will be completed in conjunction with ordinance development</i>
<b>MCM #5 Post Construction Runoff Control in New and Redevelopment</b>								
PC-1	Runoff from soil disturbance and impervious area	Develop an ordinance or other regulatory mechanism such as design standards to meet the post-construction requirements	Utilize DEQ resources and mirror what other municipalities have done.	Staff time – potential for engineering costs	Describe progress in the annual report	Complete by 2025/2026	Document progress annually	<i>No useful progress has occurred on this BMP. The enforcement plan will be completed in conjunction with ordinance development</i>
PC-2	Runoff from soil disturbance and impervious area	Evaluate the use of UICs in areas where stormwater cannot be infiltrated	Utilize engineering reports, soil surveys, field studies	Consulting cost	Report path forward in yearly report	2023/2024	Review regulatory language and soil data to determine feasibility	The consultant has reviewed UIC regulations and potential opportunities for Dallas. At this point it appears that use of UICs would be limited. The City will look for additional opportunities as the Post-Construction program is developed <b>BMP COMPLETE</b>

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
PC-3	Runoff from soil disturbance and impervious area	Develop inspection and maintenance requirements for publically owned property	The plan should include a checklist for inspections	Staff time	Report annual progress	2024/2025	Add maintenance plan and protocol to GH manual	<i>No useful progress has occurred on this BMP. The enforcement plan will be completed in conjunction with ordinance development</i>
PC-4	Runoff from soil disturbance and impervious area	Develop an inventory of private and public facilities	Review as-builts, field verify, etc	Staff time	Describe progress in the annual report	Complete by 2024/2025	Inventory shall include owner, installation date, type, etc.	Some work has occurred on this BMP, but primarily from the addition of facilities identified on as-builts through GIS work
PC-5	Runoff from soil disturbance and impervious area	Staff training	Annual staff training	Cost of training	Report annual training activities	To occur annually starting in 2022/2023	Consultant to facilitate Year 1 training	Training on 8/31/23 with other Polk and Yamhill county agencies. Training facilitated by E and S Consulting and CWT Training. Topics ID, CS, PC, GH, and regulatory
<b>MCM #6 Good Housekeeping in Municipal Operations</b>								
GH-1	Pollution from municipal operations	Develop a Good Housekeeping Manual	Include protocol for retention of trees and native vegetation along waterways	Staff time w/ Consultant	Describe progress in the annual report	Complete by 2023/2024	Complete manual and track activities	The Good Housekeeping Manual is in final draft form. It needs to be reviewed by Operations personnel for any adjustments
GH-3	Pollution from municipal operations	Street Sweeping	Continue street sweeping activities	Staff time	Provide annual activities in annual report	To occur <b>each year</b> starting in 2023	Evaluate practices to improve effort. Record quarterly removal totals	To begin after leaf season. Poundage will be tracked starting in 1/2023. This work is underway



BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when. Measure success</i>	Status
GH-4	Pollution from municipal operations	Catchbasin Cleaning	Continue catchbasin cleaning – clean 50% of total annually	Staff time	Provide annual activities in annual report	To occur <b>each year</b> starting in 2023	Evaluate practices to improve effort. Field verify condition and priority	The City has a catch basin inventory of 2340 structures. 988 were cleaned during the reporting period. 42% of the City’s catch basins were cleaned during the reporting year.
<b>Other Management Activities</b>								
Revise Imp Plan	New Temp. Req.	Revise the Implementation Plan to address new temperature TMDL	Use existing staff with assistance from the consultant to develop the plan	Consultant and staff	Complete the plan for review and approval according to the DEQ schedule	2024/2025	Document annual progress	<b>NEW</b>
		Develop a sustainable stormwater fee	Review possible options including an impervious surface study	Staff time	Provide annual activities in annual report	2025/2026	Annual progress shall include options considered, and next steps	The City has increased the stormwater fee during the report year, but a thorough evaluation of project implementation needs to occur.
		Develop a Stormwater Management Plan (SWMP)	SWMP to be developed using Phase II as a guide	Consultant to complete	Report completion date and provide upon request	2022/2023 2024/2025	Develop the SWMP according to the language within the MS4 Phase II permit A.2(c)(d)(e) and to include temperature	<i>The SWMP is currently being developed by the consultant. This completion date for this work has been extended in order to capture the requirements for the pending temperature TMDL</i>
		Complete annual reports	Develop document based on recordkeeping	Consultant to complete	Complete and submit the annual report	By due date Nov 1 <sup>st</sup> annually		Complete Review Year 2022/2023

		Evaluate public education activities according to WQMP	Choose 1 activity to promote and help lead other activities	Consultant to complete	Review activities with staff and determine most effective activity and why	To be submitted with annual report		Completed and included with Annual Report for 2022/2023
		Annually evaluate implementation efforts and program progress	Review and evaluative actions (monitoring)	Consultant to complete	Review and discuss with staff to plan changes for following year	To be submitted with annual report		Completed and included with Annual Report for 2022/2023
		Complete 5 <sup>th</sup> Year Assessment and Evaluation	Gather information based on recordkeeping and annual reports	Staff time	Complete assessment using DEQ guidelines	2026/2027		

	Control Measures
PE	Public Education
PI	Public Involvement and Participation
ID	Illicit Discharge Detection and Elimination
CS	Construction Site Runoff Control
PC	Post-Construction Runoff Control
GH	Good Housekeeping in Municipal Operations

**City of Dallas  
TMDL IMPLEMENTATION PLAN MATRIX 2022 – 2027  
Report Year 2 - October 1, 2023 to Sept. 30, 2024**

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
<b>POLLUTANT: Mercury</b>								
<b>MCM #1 Public Outreach</b>								
PE-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Develop a resource portfolio of outreach messages for the identified target audiences.	Update portfolio annually	Work to be completed by consultant	Report updates in annual report	Ongoing annually	Develop program foundation with focused approach. Annually update portfolio	
PE-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	Post relevant stormwater public education materials to the City's website.	Add new information to the website and refine	Staff	Document materials and topics covered annually and discuss in annual report	Ongoing annually	Focus on reaching target audiences and program development	
PE-3	Runoff from soil disturbance and direct discharge to waterway from riparian area	Participate in Krazy Days and/or other local events.	Host a booth or event and document materials	Small fund for display materials and incentive items	Document date of events and participation	Ongoing annually	Report number of materials handed out, date, and participation	
PE-4	Discharge from unvegetated riparian area	Provide educational opportunities and material for students.	Presentation in classroom or field events at a local park, etc	Staff time and presentation needs	Document date, # of students, and content	Ongoing annually	Report specifics of event including date, material covered, etc	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
PE-5	Runoff from soil disturbance and direct discharge to waterway from riparian area	Mail informational letter to streamside property owners 2x during the 5 year term	Letters will cover streamside responsibilities and BMPs	Staff time and mailing cost	Update mailing list	2023/24 and 2025/26	First mailing in 23/24	
PE-6	Runoff from soil disturbance and direct discharge to waterway from riparian area	Partner with local watershed council, SWCD, university, etc	Work together on joint activities for local benefit	Staff time and minimal cost for supplies	Report annual progress in yearly report	Ongoing annually	Document progress annually	
<b>MCM #2 Public Involvement</b>								
PI-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Maintain a website to post the most current environmental educational information	Post the TMDL Plan, revisions, and annual reports on City website with educational material	Staff time	Post the plan in 2022 and post plan reports submitted to DEQ annually	To occur <b>each year</b> starting in 2022	Post the plan and all regulatory reports	
PI-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	Annual presentation to City Council	Work Session presentation	Consultant and staff	Report progress in yearly report	To occur each year starting in 2022/2023	Content and date to be included in annual report	
PI-3	Runoff from soil disturbance and illicit discharges	Utilize community groups to mark catch basins and include an educational element	Utilize community groups to mark a number of basins each year	Budget for placards, and misc. costs for adhesive, kits, etc.	Track number of basins marked and report annually	To occur <b>each year</b> starting in 2024	Track number of markers installed, dates, and volunteers	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
<b>MCM #3 Illicit Discharge Detection and Elimination</b>								
ID-1	Runoff from soil disturbance and impervious area	Update the City's GIS system to include new stormwater data	Review WQMP to meet DEQ requirements	Staff time	Document annual updates	To occur <b>each year</b> starting in 2022/2023	Track annual assets (ie. outfalls, catchbasins, etc)	
ID-2	Runoff from soil disturbance and impervious area	Develop an ordinance that prohibits non-stormwater discharges into the stormwater system	Utilize ordinances and programs from other agencies	Staff time involving legal	Provide DEQ annual progress on this BMP in the annual report	Complete by 2024/2025	Document annual activities	
ID-3	Runoff from soil disturbance and impervious area	Develop and enforce an escalating and response procedure	The plan will include escalating steps of enforcement	Staff time	Report progress and final to DEQ	Complete by <del>2025/2026</del> 2024/2025	Document annual activities	
ID-4	Runoff from soil disturbance and impervious area	Annual staff training	Annual training by existing staff. Take advantage of inexpensive regional training	Include training in the annual budget	Report training date, # of employees in attendance	To occur <b>each year</b> starting in 2022/2023	Conduct annual training – develop a schedule. Yr 1 training by consultant	
ID-5	Runoff from soil disturbance and impervious area	Recordkeeping including response to complaint accounting	Utilize GIS or another database to document response to calls and complaints	Staff time	Report # of complaints and outcome annually	To occur <b>each year</b> starting in 2022/2023	Develop a response process and tracking system. Refine recordkeeping	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
ID-6	Runoff from soil disturbance and impervious area	Conduct annual outfall inspections	Field inspect outfalls and maintain inventory	Staff time	Report activities in annual report	To occur <b>each year</b> starting in 2023/2024	Complete field inspection work. Develop priority locations and identify in GIS. Develop annual screening plan	
<b>MCM #4 Construction Site Runoff</b>								
CS-1	Runoff from soil disturbance and impervious area	Coordinate with the development community regarding the need for a 1200-C permit and a ESCP Plan	Provide materials on the website and conduct site visits	Staff time	Report progress in yearly report	Ongoing to commence in 2023	Track referrals to DEQ	
CS-2	Runoff from soil disturbance and impervious area	Develop an Erosion Control Ordinance which includes DEQ requirements	Ordinance and document need to be consistent with 1200-C and 1200-CN programs	Staff time	Document annual progress	2025/2026	Report progress in each annual report	
CS-3	Runoff from soil disturbance and impervious area	Develop and enforce an escalating and response procedure to include qualifying construction sites	The response procedure will be linked to a process that applies to the ID, PC portions of the plan	Staff time	Report progress in annual report	2023/2024	Education will be emphasized prior to ordinance development. Develop draft	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
CS-4	Runoff from soil disturbance and impervious area	Develop a tracking system	Will seek to eventually tie this process to GIS	Staff time	Report progress in annual report	2023/2024	Maintain annual tracking data and include numbers in annual report	
CS-5	Runoff from soil disturbance and impervious area	Send selected personnel to CESCL training and annual training for PW personnel	Utilize resources for local training	Training fees included in budget	Report training and recertification dates	2023/2024	Obtain training City will track new certification and renewal activities. Document other training activities	
PC-1	Runoff from soil disturbance and impervious area	Develop an ordinance or other regulatory mechanism such as design standards to meet the post-construction requirements	Utilize DEQ resources and mirror what other municipalities have done.	Staff time – potential for engineering costs	Document progress annually	Complete by 2025/2026	Describe progress in the annual report	
PC-2	Runoff from soil disturbance and impervious area	Develop long-term operations and maintenance plan	The plan should include assessment factors for failing, abandoned, and needed maintenance	Staff time	Report annual progress	2023/2024	Develop a plan and document activities	<b>NEW BMP</b>

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
PC-3	Runoff from soil disturbance and impervious area	Develop inspection and maintenance materials for public and privately owned property	The plan should include a checklist for inspections and when maintenance is triggered.	Staff time	Report annual progress	2024/2025	Add maintenance plan and protocol to GH manual	
PC-4	Runoff from soil disturbance and impervious area	Develop an inventory of private and public facilities	Review as-builts, field verify, etc	Staff time	Describe progress in the annual report	Complete by 2024/2025	Inventory shall include owner, installation date, type, etc.	
PC-5	Runoff from soil disturbance and impervious area	Staff training	Annual staff training for involved personnel	Cost of training	Report annual training activities	Ongoing starting in 2022/2023	Consultant to facilitate Year 1 training	
PC-6	Runoff from soil disturbance and impervious area	Recordkeeping	Track facilities, ownership, age, type, etc	Staff time	Report annual activities	Ongoing starting in 2023/2024	Inventory existing facilities in 2023/2024	
<b>MCM #6 Good Housekeeping in Municipal Operations</b>								
GH-1	Pollution from municipal operations	Develop a Good Housekeeping Manual	The manual is a reference guide for operations personnel	Staff time w/ Consultant	Describe progress in the annual report	Revise 2023/2024	Finalize draft GH Manual	



<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
GH-2	Pollution from municipal operations	Monthly Inspections at Shop Facility	Inspections will occur according to Good Housekeeping Manual in Yr 2	Staff time	Provide completion date and documentation for inspections to DEQ	Conduct inspections starting in 2023/2024	Conduct inspections according to the manual	
GH-3	Pollution from municipal operations	Street Sweeping	Continue street sweeping activities	Staff time	Provide annual activities in annual report	To occur <b>each year</b> starting in 2023	Develop long-term operations and maintenance plan	
GH-4	Pollution from municipal operations	Catchbasin Cleaning	Continue catchbasin cleaning – clean 50% of total annually	Staff time	Evaluate practices to improve effort	To occur <b>each year</b> starting in 2023	Develop long-term operations and maintenance plan	
GH-5	Pollution from municipal operations	Annual training	Utilize consultant for initial training	Consultant	Record date, content, and employees	To occur <b>each year</b> starting in 2023	Describe progress in the annual report	
<b>POLLUTANT: Temperature</b>								
<b>MCM #1 Public Education</b>								
PE-1	Sediment loading and lack of shade	Develop a resource portfolio of outreach messages for the 5 year evaluation period	Resources to be developed by knowledgeable persons	Work to be completed by consultant	Report updates in annual report	2024/2025	Develop additional specific temperature education material	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
PE-4	Discharge from unvegetated riparian area	Provide educational opportunities and material for students.	Presentation in classroom or field events at a local park, etc	Staff time and presentation needs	Document date, # of students, and content	Ongoing annually	Report specifics of event including date, material covered, etc	
PE-5	Runoff from soil disturbance and direct discharge to waterway from riparian area	Mail informational letter to streamside property owners 2x during the 5 year term	Letters will cover streamside responsibilities and BMPs	Staff time and mailing cost	Update mailing list for second notice	2023/24 and 2025/26	First mailing in 23/24 will include temperature educational topics.	
<b>MCM #2 Public Involvement</b>								
PI-1	Sediment loading and lack of shade	Maintain a website to post the most current environmental educational information	Post the TMDL Plan on the City website with educational material	Staff time	Post the plan in 2022 and post plan reports submitted to DEQ annually	To occur <b>each year</b> starting in 2022	Post the plan and all regulatory reports	
PI-2	Sediment loading and lack of shade	Annual presentation to City Council	Work Session presentation	Consultant and staff	Report progress in yearly report	To occur <b>each year</b> starting in 2022/2023	Content and date to be included in annual report	
PI-3	Sediment loading and lack of shade	Utilize community groups to mark catch basins	Utilize community groups to mark a number of basins each year	Budget for placards, and misc. costs for adhesive, kits, etc.	Track number of basins marked and report annually	To occur <b>each year</b> starting in 2024	Track number of markers installed, dates, and volunteers	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
<b>MCM #3 Illicit Discharge Detection and Elimination</b>								
ID-1	Sediment loading and lack of shade	Update the City's GIS system to include new stormwater data Add water rights data and well data from OWRD	Review WQMP to meet DEQ requirements	Staff time	Document annual updates	To occur <b>each year</b> starting in 2022/2023	Track annual assets (ie. outfalls, catchbasins, etc)	
ID-2	Sediment loading and lack of shade	Develop an ordinance that prohibits non-stormwater discharges into the stormwater system	Utilize ordinances and programs from other agencies and include prohibition of some activities that involve using heated water	Staff time involving legal	Provide DEQ annual progress on this BMP in the annual report	Complete by 2024/2025	Document annual activities. Use Phase II as guidance.	
ID-3	(See CS-3)	Develop and enforce an escalating and response procedure to include construction sites, illegal dumping and illegal connections.	The plan will include escalating steps of enforcement	Staff time	Report progress and final to DEQ	Complete by 2024/2025	Document annual activities	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
ID-4	Sediment loading and lack of shade	Annual staff training	Annual training by existing staff. Take advantage of inexpensive regional training when available	Include training in the annual budget	Report training date, # of employees in attendance	To occur <b>each year</b> starting in 2022/2023	Conduct annual training. Record dates and content	
ID-7	Stream morphology, potential hydromodification	Add LWI findings to GIS	Utilize LWI maps to digitized in GIS	Existing budget	LWI data will be included in the City's GIS	2023/2024	Document progress	<b>NEW</b>
ID-8	Stream morphology, potential hydromodification	Assess wetlands from LWI using OFWAM or other method	Use methodology approved by DSL	Consultant	Assessment to provide value ranking	2024/2025	Document progress	<b>NEW</b>
<b>MCM #4 Construction Site Runoff</b>								
CS-2	Sediment loading and lack of shade	Develop an Erosion Control Ordinance which includes DEQ requirements as well as retention of trees and native vegetation	Ordinance and document need to be consistent with 1200-C and 1200-CN programs	Staff time	Document annual progress	2025/2026	Report progress in each annual report	
CS-3	Sediment loading and lack of shade	Develop and enforce an escalating and response procedure to include qualifying construction sites	The response procedure will be linked to a process that applies to the ID, PC portions of the plan	Staff time	Report progress in annual report	2024/2025	Education will be emphasized prior to ordinance development. Develop draft	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
<b>MCM #5 Post Construction Runoff Control in New and Redevelopment</b>								
PC-1	Sediment loading and lack of shade	Develop an ordinance or other mechanism such as design standards to meet the PC regs	Utilize DEQ resources and mirror what other municipalities have done.	Staff time – potential for engineering costs	Document progress annually	Complete by 2025/2026	Describe progress in the annual report	
PC-2	Sediment loading and lack of shade	Develop long-term operations and maintenance plan	The plan should include actions for failing, abandoned, and needed maintenance	Staff time	Report annual progress	2023/2024	Develop a plan and document activities	<b>NEW BMP</b>
PC-3	Sediment loading	Develop inspection and maintenance requirements for publically owned infiltration facilities property	The plan should include a checklist for inspections	Staff time	Report annual progress	2024/2025	Add maintenance plan and protocol to GH manual	
PC -4	Sediment loading and lack of shade	Develop an inventory of private and public facilities	Review as-builts, field verify, etc	Staff time	Describe progress and findings in the annual report	Complete by 2024/2025	Inventory shall include owner, installation date, type, etc.	
PC-5	Sediment loading and lack of shade	Staff training	Annual staff training for involved personnel	Cost of training	Report annual activities	Ongoing starting in 2023/2024	Inventory existing facilities in 2023/2024	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
GH-1	Pollution from municipal operations	Develop a Good Housekeeping Manual	Include protocol for retention of trees and native vegetation along waterways	Staff time w/ Consultant	Complete manual	Complete by 2023/2024	Finalize the draft GH Manual	
<b>POLLUTANT: Bacteria</b>								
<b>MCM # 1 Public Education</b>								
PE-1	Runoff from pervious surface, or illegal discharge	Develop a resource portfolio of outreach messages for the 5 year evaluation period	Resources to be developed by knowledgeable persons	Work to be completed by consultant	Report updates in annual report	Ongoing annually	Develop program foundation with focused approach. Annually update portfolio	
PE-2	Runoff from pervious surface, or illegal discharge	Post relevant stormwater public education materials to the City's website.	Material in the form of FAQ sheets, articles, brochures, etc	Staff	Document materials and topics covered annually and discuss in annual report	Ongoing annually	Completion of multiple documents on the website for the public to access. Update routinely	
PE-3	Runoff from pervious surface, or illegal discharge	Participate in Crazy Days and/or other local events.	Host a booth or event and document materials	Small fund for display materials and incentive items	Document date of events and participation	Ongoing annually	Report number of materials handed out, date, and participation	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
PE-5	Runoff from pervious surface, or illegal discharge	Mail informational letter to streamside property owners 2x during the 5 year term	Letters should cover streamside responsibilities and BMPs	Staff time and mailing cost	Complete mailing list in 2022/2023	2023 and 2025	Maintain records of how many recipients and copy of the letters	
PE-7	Runoff from pervious surface, or illegal discharge	Maintain pet waste stations	Stock, install, and maintain pet waste stations	Maintain budget for this activity	Collect records of when stations are stocked	To occur <b>each year</b> starting in 2022/2023	Report yearly activity in annual report	
<b>MCM #2 Public Involvement and Participation</b>								
PI-1	Runoff from pervious surface or degraded riparian area	Maintain a website to post the most current environmental educational information	Post the TMDL Imp Plan and other educational information	Staff time	Post new and updated material annually and report	To occur <b>each year</b> starting in 2022	Post the plan and all regulatory reports	
PI-3	Runoff from pervious surface or degraded riparian area	Utilize community groups to mark catch basins	Utilize community groups to mark a number of basins each year	Budget for placards, and misc. costs for adhesive, kits, etc.	Track number of basins marked and report annually	To occur <b>each year</b> starting in 2024	Track number of markers installed, dates, and volunteer	
<b>MCM #3 Illicit Discharge Detection and Elimination</b>								
ID-2	Runoff from impervious area	Develop an ordinance that prohibits non-stormwater discharges	Develop a plan to meet the conditions of IDDE in 2022/2023	Staff time involving legal	Document annual progress	Complete by 2025/2026	Provide DEQ annual progress on this BMP in the annual report	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b>
ID-3	Runoff from soil disturbance and impervious area	Develop an enforcement response plan	The plan will include escalating steps of enforcement	Staff time	Report progress and final to DEQ	Complete by 2025/2026	Document annual activities	
ID-5	Runoff from soil disturbance and impervious area	Recordkeeping including response to complaint accounting	Utilize GIS or another database to document response to calls and complaints	Staff time	Report # of complaints and outcome annually	To occur <b>each year</b> starting in 2022/2023	Develop a response process and tracking system	
<b>MCM #4 Construction Site Runoff</b>								
CS-2	Runoff from soil disturbance and impervious area	Develop an Erosion Control Ordinance which includes DEQ requirements	Ordinance and document need to be consistent with 1200-C and/or 1200-CN programs	Staff time	Document annual progress	2025/2026	Report progress in each annual report	
CS-3	Runoff from soil disturbance and impervious area	Develop and enforce an escalating and response procedure to include qualifying construction sites	The response procedure will be linked to a process that applies to the ID, PC portions of the plan	Staff time	Report progress in annual report	2023/2024	Education will be emphasized prior to ordinance development. Develop draft	



<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b> <i>This is the annual reporting column. Make certain you draw DEQ here in the annual report ("FY 2023/2024 progress is listed in the status column of the matrix)</i>
<b>MCM #5 Post Construction Runoff Control in New and Redevelopment</b>								
PC-1	Runoff from soil disturbance and impervious area	Develop an ordinance or other regulatory mechanism such as design standards to meet the post-construction requirements	Utilize DEQ resources and mirror what other municipalities have done.	Staff time – potential for engineering costs	Describe progress in the annual report	Complete by 2025/2026	Document progress annually	
PC-2	Runoff from soil disturbance and impervious area	Develop long-term operations and maintenance plan	The plan should include actions for failing, abandoned, and needed maintenance	Staff time	Report annual progress	2023/2024	Develop a plan and document activities	
PC-3	Runoff from soil disturbance and impervious area	Develop inspection and maintenance requirements for publically owned property	The plan should include a checklist for inspections	Staff time	Report annual progress	2024/2025	Add maintenance plan and protocol to GH manual	
PC-4	Runoff from soil disturbance and impervious area	Develop an inventory of private and public facilities	Review as-builts, field verify, etc	Staff time	Describe progress in the annual report	Complete by 2024/2025	Inventory shall include owner, installation date, type, etc.	

<b>BMP#</b>	<b>Source</b> <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	<b>Strategy</b> <i>What will be done to control or reduce pollutant from source?</i>	<b>How</b> <i>Specifically, how will this be done?</i>	<b>Fiscal Considerations</b> <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	<b>Measure</b> <i>How will successful implementation or completion be measured?</i>	<b>Timing</b> <i>When will the strategy be completed?</i>	<b>Milestone</b> <i>What intermediate goals will be achieved and by when. Measure success</i>	<b>Status</b> <i>This is the annual reporting column. Make certain you draw DEQ here in the annual report ("FY 2023/2024 progress is listed in the status column of the matrix)</i>
PC-5	Runoff from soil disturbance and impervious area	Staff training	Annual staff training	Cost of training	Report annual training activities	To occur annually starting in 2022/2023	Consultant to facilitate Year 1 training	
<b>MCM #6 Good Housekeeping in Municipal Operations</b>								
GH-1	Pollution from municipal operations	Develop a Good Housekeeping Manual	Include protocol for retention of trees and native vegetation along waterways	Staff time w/ Consultant	Describe progress in the annual report	Complete by 2023/2024	Complete manual and track activities	
GH-3	Pollution from municipal operations	Street Sweeping	Continue street sweeping activities	Staff time	Provide annual activities in annual report	To occur <b>each year</b> starting in 2023	Evaluate practices to improve effort. Record quarterly removal totals.	
GH-4	Pollution from municipal operations	Catchbasin Cleaning	Continue catchbasin cleaning – clean 50% of total annually	Staff time	Provide annual activities in annual report	To occur <b>each year</b> starting in 2023	Record # of structures cleaned annually and evaluate practices to improve effort.	
<b>Other Management Activities</b>								
Revise Imp Plan	New Temp. Req.	Revise the Implementation Plan to address new temperature TMDL	Use existing staff with assistance from the consultant to develop the plan	Consultant and staff	Complete the plan for review and approval according to the DEQ schedule	TBD	Document annual progress	<b>NEW</b>
		Develop a sustainable stormwater fee	Review possible options including an impervious surface study	Staff time	Provide annual activities in annual report	2025/2026	Annual progress shall include options considered, and next steps	

		Develop a Stormwater Management Plan (SWMP)	SWMP to be developed using Phase II as a guide	Consultant to complete	Report completion date and provide upon request	2024/2025	Develop the SWMP according to the language within the MS4 Phase II permit A.2(c)(d)(e)	
		Complete annual reports	Develop document based on recordkeeping	Consultant to complete	Complete and submit the annual report	By due date Nov 1 <sup>st</sup> annually		
		Evaluate public education activities according to WQMP	Choose 1 activity to promote and help lead other activities	Consultant to complete	Review activities with staff and determine most effective activity and why	To be submitted with annual report		
		Annually evaluate implementation efforts and program progress	Review and evaluative actions (monitoring)	Consultant to complete	Review and discuss with staff to plan changes for following year	To be submitted with annual report		
		Complete 5 <sup>th</sup> Year Assessment and Evaluation	Gather information based on recordkeeping and annual reports	Staff time	Complete assessment using DEQ guidelines	2026/2027		

	Control Measures
PE	Public Education
PI	Public Involvement and Participation
ID	Illicit Discharge Detection and Elimination
CS	Construction Site Runoff Control
PC	Post-Construction Runoff Control
GH	Good Housekeeping in Municipal Operations