ROGUE VALLEY
SEWER SERVICES
CLEAN WATER - HEALTHY COMMUNITIES

# ANNUAL NPDES PHASE II REPORT FOR FISCAL YEAR 2020

## FOR THE COMMUNITIES OF:

CITY OF PHOENIX
O•R•E•G•O•N

TALENT • OREGON
1911

JACKSON COUNTY
Oregon


## ROGUE VALLEY SEWER SERVICES

Location: 138 West Vilas Road, Central Point, OR - Mailing Address: P.O. Box 3130, Central Point, OR 7502-0005
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State of Oregon
Department of
Environmental
Quality

# Annual Report

## MS4 Phase II General Permit

**National Pollutant Discharge Elimination System**
**MS4 Stormwater Discharge Permit**

## Fiscal Year 2020
## Monitoring Year

## Rogue Valley Sewer Services
## November 19, 2020

## DEQ File Number: 116270

| 1.0 Certification and Signature |
|---|
| 1. Permit Registrant(s): Rogue Valley Sewer Services |
| 2. Legally Authorized Representative: Carl Tappert |
| 3. Title: General Manager |
| 4. Email: ctappert@rvss.us |
| 5. Phone: 541-779-4144 |

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 (40 CFR 122.22(d)).

Signature: _____ Date: Dec. 1 2020

Created by M. Riedel-Bash
Date: 12/27/2018

# Table of Contents

# Instructions

At least once per year, the permit registrant must evaluate compliance with the requirements of the MS4 Phase II general permit using this Annual Report template. This self-evaluation includes assessment of progress made towards implementing the SWMP control measures in Schedule A, and implementation of actions to comply with any additional requirements identified pursuant to Schedule D.1 (Requirements for Discharges to Impaired Waterbodies).

For each SWMP control measure or activity listed below, please answer all the questions and in the comments field cite any relevant information and/or statistics that helps to illustrate implementation or compliance. If your answer is "No," in the comments field explain the reasons and outline the anticipated implementation timeline. If the requirement does not apply, explain why it is not applicable in the comments field.

No later than November 1 each year, beginning in 2020, the permit registrant must submit an Annual Report to DEQ. One signed copy and one electronic copy must be submitted to DEQ using the address provided in permit. DEQ can provide an FTP site for submittal of the electronic copy, upon request.

## 2.0 General Information

### 2.1 Registrant Information

| | | |
|---|---|---|
| 6. Permit Registrant(s): Rogue Valley Sewer Services | | |
| 7. Type(s): ☐ City / ☐ County / ☒ Special District / ☐ Other: | | |
| 8. Registrant Type:<br>Existing Registrant: ☒ New Registrant: ☐ | | |
| 9. Community Type:<br>Large Community: ☒ Small Community: ☐ | | |
| 10. DEQ Permit No: 116270 | | |
| 11. EPA File No: ORS116270 | | |
| 12. Physical Address: 138 West Vilas Road | | |
| City: Central Point | State: OR | Zip: 97502 |
| 13. Point of Contact: Jennie Morgan | | |
| Title: Stormwater Program Manager | Email: jmorgan@rvss.us | Phone: 541-727-6876 |
| 14. Mailing Address (*if different*): PO Box 3130 | | |
| City: Central Point | State: OR | Zip: 97502 |

### 2.2 Municipal Separate Storm Sewer System (MS4) Information

| |
|---|
| 15. Estimate the area in square mileage served by the MS4: 30.4 square miles |
| 16. Estimate the population served by the MS4: 40,829 |

### 2.3 MS4 Stormwater Discharge Information

Identify the names of all known waters that receive a discharge from your MS4.

| Receiving Waterbody | # of Outfalls | Impaired waterbody | | Impairment(s) |
|---|---|---|---|---|
| | | 303d listed | TMDL issued | |
| a. Data is provided in the attached Table 1. | | Yes ☐ No ☐ | Yes ☐ No ☐ | |
| b. | | Yes ☐ No ☐ | Yes ☐ No ☐ | |
| c. | | Yes ☐ No ☐ | Yes ☐ No ☐ | |
| d. | | Yes ☐ No ☐ | Yes ☐ No ☐ | |
| e. | | Yes ☐ No ☐ | Yes ☐ No ☐ | |
| f. | | Yes ☐ No ☐ | Yes ☐ No ☐ | |
| g. | | Yes ☐ No ☐ | Yes ☐ No ☐ | |
| h. | | Yes ☐ No ☐ | Yes ☐ No ☐ | |
| i. | | Yes ☐ No ☐ | Yes ☐ No ☐ | |
| j. | | Yes ☐ No ☐ | Yes ☐ No ☐ | |

## 2.4 Coordination Among Registrants and Joint Agreements

Required for permit registrants relying on another entity to satisfy one or more of the requirements of the permit.

17. Is there a joint agreement in place for the implementation of one or more stormwater management program control measures? *Schedule A.2* Yes ☒ No ☐

18. If yes, has there been any change to the joint agreement(s) submitted previously? Yes ☐ No ☒
If yes, include, as an attachment, a summary of the changes.
Revised Intergovernmental Agreements were submitted with the FY19 Annual Report.

## 2.5 Stormwater Management Program Information

19. Discuss the status and overall progress of establishing legal authority to control pollutant discharges into and discharges from the MS4 and to implement and enforce the conditions of this permit. *Schedule A.2.c*
RVSS established legal authority to control pollutant discharges into and discharges from the MS4 in its code with the initial permit issuance in 2007.

## 2.6 Stormwater Management Program Information

20. Is an updated SWMP Document attached? *Schedule A.2.c*
Yes ☐ No ☒ *(must be submitted with the second Annual Report)*
If necessary, provide an explanation:
The required revised public education and outreach and public involvement sections were submitted to DEQ in February 2020.

21. Identify the publicly accessible website where the SWMP Document is posted. *Schedule 2.c & A.3.b.ii*
https:// www.rvss.us/pilot.asp?pg=stormwaterdocs
If necessary, provide an explanation:

22. Does the SWMP Document include an implementation schedule for control measures that have yet to be or are partially implemented? *Schedule A.2.c*
Yes ☒ No ☐
If necessary, provide an explanation:
The MS4 Phase 2 permit implementation schedule has deadlines extending into 2023.

23. Describe the method used to gather, track, and use SWMP information to set priorities or assess compliance: *Schedule A.2.d*

RVSS has developed MSAccess and GIS databases to track 1200-C/CN permitted projects and projects requiring compliance with the post-construction stormwater requirements. Dates of plan review and approval are tracked as well as installation and maintenance inspection dates. Inspection dates and evaluations are recorded in the field using Collector and evaluations are recorded in the field using Survey123. Collector and Survey123 are ESRI products that feed directly into our GIS databases. An MSAccess database was also created to track visits to stormwater outfalls including date of visit and outfall conditions based on the Center for Watershed Protection's 2004 field reconnaissance survey. The databases are queried periodically to determine how many inspections have occurred and work plans are then set to achieve the target number of annual inspections.

Our Salmon Watch program is evaluated each year using pre and post tests administered to attendees, as well as written evaluations from the teachers. The test scores and written evaluations help to inform us of how the program should be modified to meet education goals. Pre and post testing is also used to evaluate the success of each Erosion Prevention and Sediment Control Designated Inspector course.

24. Have adequate finances, staff, equipment and other support capabilities been provided to implement the permit? *Schedule A.2.e*
Yes ☒ No ☐
If necessary, provide an explanation:

| |
|---|
| 25. During this monitoring year was compliance with the requirements of this permit evaluated? *Schedule B.1*<br>Yes ☒ No ☐<br>If necessary, provide an explanation: |
| 26. During this monitoring year was it determined or reported that discharge from the MS4 caused or contributed to an excursion of an applicable water quality standard? *Schedule A.1.a*<br>Yes ☐ No ☒<br>***If "Yes", complete section 3.7, Water Quality Standards of this template.*** |

## 3.0 Stormwater Management Program Control Measures

### 3.1 Public Education and Outreach

27. Provide a brief summary of the ongoing public education and outreach program. *Schedule A.3.a*

RVSS has a year-round public education and outreach program reaching diverse audiences in the jurisdiction through numerous communication channels and methods. RVSS participates in or leads numerous collaborative projects and programs, attends events, gives presentations, and engages community and school groups as well as individuals on a variety of topics and activities all related to increasing the understanding of stormwater issues, the impacts of stormwater on water quality, and ways to reduce pollutants in stormwater. RVSS partners frequently with the Rogue Valley Council of Governments on public participation, education, and outreach. Further details on activities described in the RVCOG Annual Report 2019-2020, attached.

28. Were the required components in place by the implementation date? *Schedule A.3.a.i*

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2020 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

29. Provide the number of education and outreach activities conducted: *Schedule A.3.a.iii*

During this reporting year: 24 outreach and education events and activities were completed and RVSS had direct contact with 1,087 individuals in FY20. See Table 2 for a complete listing.

30. During the permit term:

If necessary, provide an explanation:

31. Indicate target audiences addressed during this reporting year: *Schedule A.3.a.iv*

☒ General public, homeowners, homeowner association, schoolchildren, and businesses
☒ Local elected officials, land use planners and engineers
☒ Construction site operators

32. Have each target audience been addressed during the permit term? *Schedule A.3.a.iv*

Yes ☒ No ☐

33. Indicate target topics addressed during this reporting year: *Schedule A.3.a.iv*

☒ Impacts of illicit discharges on receiving waters and how to report them
☒ Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts
☐ BMPs for proper use, application and storage of pesticides and fertilizer
☒ BMPs for litter and trash control
☐ BMPs for recycling programs
☐ BMPs for power washing, carpet cleaning and auto repair and maintenance
☒ Low impact development/green infrastructure
☐ Information pertaining to maintenance of septic systems
☒ Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife
☒ Other: Erosion & sediment control BMPs for construction site operators

34. Describe the types of educational messages or activities distributed and/or offered during this reporting year. *Schedule A.3.a.iii*

A variety of communication messages and activities occurred during the period as shown in Table 2, a brief description of selected activities is provided below:

RVSS staff initiated and then assisted the City of Talent Public Arts Committee in implementing a storm drain art project that resulted in the creation of four painted sidewalk murals centered on high visibility storm drains, with the message "Bear Creek Starts Here" emphasizing the stormwater system's connection to surface water. The project was very well received by the community including members of city government, participating artists, passers-by during the installation of the murals, and the public at large when the project was publicized at completion. RVSS staff included the painted stormdrains when doing stormwater tours with local school groups and most students had seen the art and understood its relevance to protecting stormwater quality. An article ran the Mail Tribune, July 22, 2019, on this project

https://mailtribune.com/news/top-stories/five-art-contest-winners-will-paint-designs-on-storm-drains-in-talent-to-highlight-water-issues

RVSS is a co-coordinator with the Rogue Valley Council of Governments Natural Resources Department of the Salmon Watch outdoor education program. This program has operated as a consortium for seven years in the Rogue basin and brings students to local rivers and streams to experience spawning salmon. In FY 2020, Rogue Valley Sewer Services partnered with 15 regional organizations and served over 1,490 students from 18 participating schools in the Rogue basin. RVSS staff offered in-class presentations and had contact with over 200 students prior to their Salmon Watch field trips. A classroom visit by RVSS staff included an activity and discussion of stormwater pollution prevention and reduction as well as an analysis of stormwater movement and possible sources of pollution in the schoolyard. RVSS staff had direct contact with almost 200 students during Salmon Watch field trips. The Mail Tribune reported on Salmon Watch Friday, October 25th 2019: https://mailtribune.com/news/top-stories/from-classroom-to-creek

A banner with the message "Only Rain In The Drain" was displayed at the Phoenix High School gym and outdoor sports fields that serves students, athletes, and community members from two towns in the jurisdiction. Signage in these locations are viewed multiple times by students, staff, faculty, and others (clubs, visiting teams, etc.) participating or attending sporting events, practices, and activities or classes in these locations. The high school enrollment is over 700; unique views of the banners could be easily estimated at well over 2,000.

RVSS staff organized a Hazardous Materials Spill Response Training for Municipal Employees which was attended by 53 people from eight jurisdictions including public works departments, storm and sanitary sewer jurisdictions, and irrigation districts. The training provided information for how municipal employees should respond to spills, where to report spills, and what actions they should, or should be taken following a spill. Presenters included representatives from the OR DEQ, the local Hazardous Materials Response Team fire department lead, and an OR Department of Transportation trainer on Hazardous Materials Response.

RVSS staff initiated and led a region-wide messaging campaign on "Imagine a Day Without Water". Nine jurisdictions and agencies participated in the coordinated communications campaign which included classes, field trips, site visits, facility tours, as well as social media and web posts on a variety of water resource related topics. Stormwater specific messaging was included as part of the campaign. Over 200 people in the region participated in classes and tours related to the "Imagine a Day Without Water". The Mail Tribune ran an article Monday, October 21st 2019: https://mailtribune.com/news/top-stories/imagine-a-day-without-water

RVSS staff assisted the City of Talent to promote the "adoption" of stormwater facilities to improve maintainance and increase engagement on stormwater. Four facilities were "adopted" and RVSS staff trained all the individuals involved in maintaining the facilities. Facility "adopters" included the entire City Council, several middle school classes, a local stewardship group, and a local business. The Mail Tribune reported on this program Thursday, October 31st 2019: https://mailtribune.com/news/education/talent-students-map-plants-by-wagner-creek

RVSS administers its own website and Facebook page, both of which cover stormwater topics and provide information to various audiences. RVSS is an active participant in the Rogue Basin Stream Smart collaborative, a group made up of MS4 and TMDL communities to deliver a unified brand and message to our region focused on protecting water quality. The Stream Smart collaborative hosts a website, Facebook page, and Instagram account to connect to a varied audience with stormwater related content. RVSS contributes to both social media channels and works with the collaborative on the website.

35. Was outreach to construction site operators working within your community offered during this reporting year? *Schedule A.3.a.v*

Yes ☒ No ☐

36. Total number during the permit term: Formal outreach to construction site operators was provided through Designated Erosion Prevention and Sediment Control Inspector Certification classes offered by RVSS for construction contractors, public works employees and engineers. RVSS is listed in the 2015 1200-C permit as an approved provider of certification classes. In FY20, 28 individuals received first time certification and 12 individuals received recertification. Numbers are down compared to previous years as our normal May certification and renewal classes were cancelled due to COVID19. Numerous incidences of informal outreach occur throughout the year during on-site inspections.

37. Identify and describe the assessment/evaluation of, at least, one education and outreach activity that occurred during this reporting year. Include the assessment process or metric for evaluation, and why this activity was considered successful. *Schedule A.3.a.vi*

    The Salmon Watch program is a field trip with extensive water quality and watershed related curriculum primarily for students grades 4-8. Salmon Watch students complete an eight question multiple choice quiz prior to their field trip and after their field trip (both quizzes are usually within one week of the field trip). In FY20, approximately 5% (75) of the Salmon Watch students answered all of the questions on the quiz and returned both the pre and post field trip quiz. 82% of respondents had at least a 10% increase in correct answers. 44% of respondents had at least a 25% increase in correct answers. 23% of respondents had at least a 50% increase in correct answers. These metrics indicate that learning occurred and the activity was successful.

    RVSS is a partner and member of the Clean Rivers Coalition (CRC) Steering Committee that contracted for a survey of 1,000 people (29% of which were not in the Washington, Multnomah or Clackamas Counties or other Willamette Valley areas). In addition, a focus group of eight Jackson County residents discussing similar topics was conducted. The purpose of the survey and focus group was to assess residents' connections to rivers, streams, and lakes, perceptions of insecticides, herbicides, and fertilizers, and willingness to change their lawn care behaviors. These viewpoints and perceptions directly relate to people's understanding of stormwater and their willingness to adopt behaviors that are protective of water quality. The CRC is embarking on a campaign to educate the public about usage of these products and future surveys will be conducted to determine if any change in behavior occurs as a result of the campaign.

38. Will the assessment be used to inform future stormwater education and outreach efforts? *Schedule A.3.a.vi*

    Yes ☒ No ☐

39. Provide an explanation:

    The program assessment metrics indicate the Salmon Watch program is successful at delivering the intended message. The success metrics will be used to help us continue to obtain funding to provide the program.

## 3.2 Public Involvement and Participation

40. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.b*

The Rogue Valley MS4 permittees formed the Stormwater Advisory Team (SWAT) in 2004 to work collaboratively on Stormwater Management Plan development and implementation. The SWAT is open to the public and anyone is able to comment on the topics and proposals discussed. Voting is limited to MS4 permit holders. RVSS has been a leading member of the SWAT, which continues to meet quarterly, ever since.

Additionally, RVSS makes a concerted effort to engage with each of its co-implementer's staff specifically to seek their input into our Stormwater Management program and to identify opportunities for collaboration. In FY20, RVSS worked with co-implementers, partners, and sought public comment on the proposed revisions to the public education and outreach and public involvement portions of our Stormwater Management Plan, which is publically available on the RVSS website. RVSS presented an overview of the stormwater management program and the updated sections of the SWMP to the Phoenix City Council in April 2020.

Currently, RVSS is working with our co-implementers and SWAT members to jointly develop plans and strategies to meet the requirements of the new permit including developing SOPs and BMPs for Municipal Operations in Pollution Prevention. In addition, RVSS attends community events in each of our co-implementers jurisdictions to educate the public about stormwater issues and to seek their input in our program. Specifically, RVSS attended the Talent Community Development Fair in January 2020 to talk with residents about their concerns regarding stormwater management in Talent.

41. Were the required components in place by the implementation date? *Schedule A.3.b.i*
    Yes ☒ No ☐ *(Implementation date: Feb. 28, 2020 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

42. Is the SWMP Document posted on a publicly accessible website? *Schedule A.3.b.ii*
    Yes ☒ No ☐

43. Was the publicly accessible website updated during this reporting year? *Schedule A.3.b.ii*
    Yes ☒ No ☐
    If necessary, provide an explanation:

44. Does the publicly accessible website include illicit discharge complaint/reporting information or procedures? *Schedule A.3.b.ii.A*
    Yes ☒ No ☐
    If necessary, provide an explanation:

45. Does the publicly accessible website include draft documents issued for public comment, final reports, plans and other official SWMP policy documents? *Schedule A.3.b.ii.B*
    Yes ☒ No ☐
    If necessary, provide an explanation:

46. Does the publicly accessible website include links to all ordinances, policies and/or guidance documents related to the construction and post-construction stormwater management control programs, including education, training, licensing, and permitting? *Schedule A.3.b.ii.C*
    Yes ☒ No ☐
    If necessary, provide an explanation:

47. Does the publicly accessible website include contact information for relevant staff, including phone numbers, mailing addresses and email addresses? *Schedule A.3.b.ii.D*
    Yes ☒ No ☐
    If necessary, provide an explanation:

48. During this reporting year, was a stewardship opportunity created or partnered with another entity? *Schedule A.3.b.iii*
Yes ☒ No ☐

If "Yes", summarize the stewardship opportunity(s).

RVSS is a leading member of the "Stream Smart" collaborative, which maintains a publically accessible website focused on conveying information to the public on how they can help protect and improve water quality and promotes watershed stewardship as well as outreach and education events and opportunities.
RVSS contributed to several stewardship opportunities through the reporting period including facility maintenance, stream clean-ups, and riparian restoration.

- In FY20, RVSS participated in a stormwater facility maintence and clean-up activity in Talent and a facility planting event in Phoenix as part of the bi-annual "Bear Creek Stewardship Day" which this year, due to the pandemic was only held in the fall and was cancelled for the spring. "Bear Creek Stewardship Day" is a collaboration with numerous other entities in the region and uses the SOLVE platform to organize and implement a watershed-wide stewardship event that can include stream clean-up, riparian restoration, or stormwater quality facility improvement work at multiple sites. RVSS usually partcipates at both the fall and spring events in Talent and Phoenix. Total public involvement at the fall event in FY20 was over 167 people, with over 3,345 lbs. of trash collected from 11 sites.

- Adopt-a-Swale. RVSS works closely with schools in their jurisdiction and has developed an on-going relationship with the STEM program at Talent Middle School. Several times a year, RVSS staff brought student groups to nearby vegetated stormwater facilities to discuss stormwater runoff pollution and the function and benefits of vegetated stormwater management facilities. The students also obtain hands on experience performing maintenance tasks on the facilities. In FY20, the Talent City Council adopted maintenance of a large and highly visible stormwater facility.

## 3.3 Illicit Discharge Detection and Elimination

49. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.c*

In FY20 RVSS continued to implement this MCM as we have for the past 13 years with dry weather sampling of stormwater outfalls, following the protocols outlined in the Center for Watershed Protection's 2014 manual. We are in the process of updating our GIS stormwater maps through on the ground GPS data collection. RVSS is working with our co-implementers to help them develop SOPs to implement pollution prevention BMPs in their own operations. RVSS is also involved in the Middle Rogue Pesticide Stewardship Partnership having helped to establish the sampling locations and protocols beginning in 2014. In FY20 RVSS contintued to coordinate with the partners to determine appropriate sampling locations and to evaluate the data. We are beginning the next phase of the partnership which is to determine how to change behavior based on the information we have obtained.

50. Were the required components in place by the implementation date? *Schedule A.3.c.i*

Yes ☐ No ☐ *(Implementation date: Feb. 28, 2022 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

51. Is the MS4 map(s) current? *Schedule A.3.c.ii.A*

Yes ☐ No ☐

52. Describe the MS4 map(s) format(s):

Our MS4 maps are in GIS format and as mentioned in question 49, we are in the process of updating them. The maps were created over 10 years ago using as-built plans, we are now in the process of field surveying stormwater features to update our GIS maps. Additionally, we have established processes for updating the stormwater mapping as development occurs.

Is the MS4 map(s) included as attachment? Yes ☐ No ☒

Or, are the digital shapefiles available for electronic submittal? Yes ☒ No ☐

*(Existing Registrants must submit their MS4 map with the third Annual Report; New Registrants must submit by Sept. 1, 2023)*

If necessary, provide an explanation:

53. Is the digital inventory of all known outfalls, with the associated receiving waterbody current? *Schedule A.3.c.ii.A*

Yes ☒ No ☐

If necessary, provide an explanation:

All outfalls shown in our GIS maps were GPS'd in the field, however some were last GPS'd 15 years ago. We are now in the process of updating the location data with new GPS technology.

54. Indicate if the following features are included on your MS4 map:

- ☒ Location of all known outfalls, including the requirements in *Schedule A.3.c.ii.B*
- ☒ Stormwater collection and conveyance system, including the requirements in *Schedule A.3.c.ii.C*
- ☒ Stormwater structural controls, including the requirements in *Schedule A.3.c.ii.C*
- ☐ Location of known chronic discharges *Schedule A.3.c.ii.D*

If necessary, provide an explanation:

We have no known chronic discharges.

55. Have non-stormwater discharges into the MS4 been prohibited through enforcement of an ordinance or other regulatory mechanism? *Schedule A.3.c.iii*

Yes ☒ No ☐

If necessary, provide an explanation:

56. Indicate which of the following have an ordinance or other regulatory mechanism to prohibit discharge to the MS4: *Schedule A.3.c.iii*

- ☒ Septic, sewage, and dumping or disposal of liquids or materials other than stormwater into the MS4
- ☒ Discharges of washwater resulting from the hosing or cleaning of gas stations, auto repair garages, or other types of automotive services facilities
- ☒ Discharges resulting from the cleaning, repair, or maintenance of any type of equipment, machinery, or facility, including motor vehicles, cement-related equipment, and port-a-potty servicing, etc.

☒ Discharges of washwater from mobile operations, such as mobile automobile or truck washing, steam cleaning, power washing, and carpet cleaning, etc.

☒ Discharges of washwater from the cleaning or hosing of impervious surfaces in municipal, industrial, commercial, or residential areas (including parking lots, streets, sidewalks, driveways, patios, plazas, work yards and outdoor eating or drinking areas, etc.) where detergents are used and spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed)

☒ Discharges of runoff from material storage areas, which contain chemicals, fuels, grease, oil, or other hazardous materials from material storage areas

☒ Discharges of pool or fountain water containing chlorine, biocides, or other chemicals; discharges of pool or fountain filter backwash water

☒ Discharges of sediment, unhardened concrete, pet waste, vegetation clippings, or other landscape or construction-related wastes

☒ Discharges of trash, paints, stains, resins, or other household hazardous wastes

☒ Discharges of food-related wastes (grease, restaurant kitchen mat and trash bin washwater, etc.)

If necessary, provide an explanation:

RVSS code currently addresses this in Section 4.05.100 with the following language: 3) Discharge. a) Prohibition of Illegal Discharges. No person shall throw, dump, drain, or otherwise discharge, cause, or allow others under its control to throw, dump, drain, or otherwise discharge into the public storm sewer system any pollutants or waters containing any pollutants, other than Stormwater. The commencement, conduct, or continuance of any illegal discharge into the storm sewer system is prohibited. If any discharge is determined by the manager, or designee, to cause, or threaten to cause, a condition of pollution, contamination or nuisance, the discharge shall be stopped, treated and cleaned up to the maximum extent practicable by the person responsible for the discharge. The prohibition shall not apply to any non-Stormwater discharge permitted under an NPDES permit,…"

57. Is the written escalating enforcement and response procedure included as an attachment? *Schedule A.3.c.iv*

Yes ☒ No ☐

*(For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023)*

If necessary, provide an explanation:

See attachment 3.3 SOP 14.06, Stormwater Quality Enforcement

58. Is there a phone number, webpage, and/or other communication channel publicized for the public use to report illicit discharges? *Schedule A.3.c.v.A*

☒ Phone number(s)

☐ Webpage(s)

☐ Other communication channels

If necessary, provide an explanation:

59. Provide the number of complaints received during this reporting year. *Schedule A.3.c.v.D*

Number: Four, see Table 3. *(complaints related to IDDE)*

60. On average, how long did it take to respond to complaints? *Schedule A.3.c.v.B*

In working days: Two

61. Provide the number of complaints that included notification of the Oregon Emergency Response System during this reporting year. *Schedule A.3.c.v.B*

Number of notification: One

62. Provide the number of complaints where staff performed an investigation during this reporting year. *Schedule A.3.c.v*

Number: Four *(investigations related to IDDE)*

63. On average, how long did it take to conduct an initial investigation? *Schedule A.3.c.v.B*

In working days: Two

64. Provide the number of illicit discharges discovered and eliminated during this reporting year. *Schedule A.3.c.v*

Number: Three

65. On average, how long did it take to eliminate an illicit discharge? *Schedule A.3.c.v.B*

In working days: One

66. Provide the number times escalating enforcement procedure was used to eliminate illicit discharge during this reporting year. *Schedule A.3.c.v.D*

    Number of times: None

Do any of the illicit discharges involve the repair or replacement of the wastewater and/or storm sewer conveyance systems? *Schedule A.3.c.v.B*

Yes ☒ No ☐ NA ☐

If necessary, provide an explanation:

On August 27, 2019, through the process of routine dry weather screening for illicit discharges, RVSS staff discovered a stormwater outfall that appeared to have sanitary sewer discharge. E. coli sampling showed that E. coli concentration in the discharge was off the charts. RVSS immediately conducted a follow-up investigation and found a sanitary sewer line that was cross-connected to the stormwater system. RVSS removed the cross connection and properly connected the sanitary line to the sanitary conveyance system on September 3rd, 2019.

67. Provide the number of illicit discharges that were referred to another entity during this reporting year. *Schedule A.3.c.v.C*

    Number: One

68. On average, how long did it take to notify the entity(s)?

    In working days: Same day.

    If necessary, provide an explanation:

69. Indicate which of the following are included in the complaints or reports tracking documentation: *Schedule A.3.c.v.D*

- ☒ Date the complaint was received and, if available, the complainant's name and contact information
- ☒ Name of staff responding to the complaint
- ☒ Date the investigation was initiated
- ☒ The outcome of the staff investigation
- ☒ Corrective action(s) taken to eliminate the illicit discharge
- ☒ The responsible party for the corrective action(s)
- ☒ The status of enforcement procedure(s), when necessary
- ☒ The date the corrective action(s) was completed and staff who evaluated final compliance

If necessary, provide an explanation:

70. Provide percentage of outfalls inspected. *Schedule A.3.c.vi.A/B*

    Known outfalls screened this reporting year: 31/199

71. Known outfalls screened during the permit term: 31/199

    If necessary, provide an explanation:

72. Provide percentage of outfalls inspected as part of field screening of priority location. *Schedule A.3.c.vi.C*

    Priority location outfalls screened this reporting year: No priority locations have been identified at this time.

73. Priority location outfalls screened during the permit term: No priority locations have been identified at this time.

    If necessary, provide an explanation:

74. Indicate which of the following dry-weather field screening activities have been performed in the last year: *Schedule A.3.c.vi*

- ☒ General observation
- ☒ Field Screening and Analysis
- ☐ Pollutant Parameter Action
- ☒ Laboratory Analysis

If necessary, provide an explanation:

75. If flow is observed and the source is unknown, provide a brief description of the field investigation and analysis process. *Schedule A.3.c.vi.D,E,G*

    All flowing outfalls are sampled and analyzed for E. coli, for any samples that exceed the 406MPN/100ml a follow-up investigation is conducted to determine the source of the flow. There is consistent high ground water in the Rogue Valley and most flow from outfalls is groundwater or irrigation.

76. Have pollutant parameter action levels been established and are they included as an attachment? *Schedule A.3.vi.F*

    Yes ☐ No ☒

    *(For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023)*

    If necessary, provide an explanation:

    Although not formally established as a pollutant parameter action level, RVSS has been monitoring flowing outfalls for E. coli since at least 2013. RVSS will be establishing an action level of 406MPN/100mL for E. coli. As this is the primary pollutant of concern in the Bear Creek basin, no other pollutant parameters will be established.

77. Are all persons responsible for investigating and eliminating illicit discharges and illicit connections into the MS4 appropriately trained to conduct such activities? *Schedule A.3.c.vii*

    Yes ☒ No ☐

    If necessary, provide an explanation:

78. Are all new staff working to implement the IDDE program trained within 30 days of their assignment to this program*? Schedule A.3.c.vii*

    Yes ☒ No ☐

    If necessary, provide an explanation:

## 3.4 Construction Site Runoff Control

79. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.d*

RVSS has had a robust construction site runoff control program since issuance of the initial Phase 2 permit in 2007. RVSS became a 1200-C Agent in 2006 and in 2010 began implementing the 1200-CN permit, which requires us to do in-house reviews of erosion prevention and sediment control plans. We have been offering a local Designated Inspector Erosion and Sediment Control course for at least a decade in order to educate local contractors, engineers and public works employees on proper erosion prevention and sediment control measures. RVSS served on an ACWA committee in 2013 to develop a field guide on proper BMP installation and maintenance and has in-house inspectors that provide oversight inspections of 1200-C and CN permitted projects.

80. Were the required components in place by the implementation date? *Schedule A.3.d.i*

Yes ☐ No ☐ *(Implementation date: Feb. 28, 2023 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

81. Do ordinances or other regulatory mechanisms require erosion controls, sediment controls, and waste materials management controls to be used and maintained at all qualifying construction projects? *Schedule A.3.d.ii*

Yes ☒ No ☐ NA ☐

If necessary, provide an explanation:

RVSS' code, section 4.05.110 Development, requires that projects greater than one acre in area obtain a 1200-CN permit and those greater than five acres in area obtain a 1200-C permit. The permits detail the requirements for erosion and sediment controls and waste management practices.

82. Indicate the minimum land disturbance where construction site operators are required to complete and implement an Erosion and Sediment Control Plan (ESCP) for construction project sites: *Schedule A.3.d.ii*

In square feet or portion of an acre: One $ft^2$ ☐, acres ☒

If necessary, provide an explanation:

Projects greater than one acre are required to create and implement an ESCP in accordance with the 1200-C/CN permit. Projects less than one acre currently sign a one page "Small site stormwater permit" that lists BMPs that the developer agrees to follow. The permits are not site specific and no plan for the project is required. RVSS' code requires construction projects less than one acre to abide by the prohibition on illicit discharges. The code does not specifically require erosion, sediment or waste management controls.

83. For construction projects that disturb one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres), provide a brief description how these project are referred to DEQ or the appropriate DEQ agent, to obtain a NPDES Construction Stormwater General Permit. *Schedule A.3.d.iii*

RVSS is a 1200-C and 1200-CN agent. All projects within our MS4 boundary that disturb greater than one acre must apply for a 1200-C or CN permit through our office. We coordinate review of the erosion control, sanitary sewer and post-construction designs so that a single project approval is issued when all parts meet our standards.

84. Provide the written specifications that address the proper installation and maintenance of such controls during all phases of construction activity as an attachment *Schedule A.3.d.iv*

Attached: Yes ☐ No ☒

If necessary, provide an explanation:

RVSS served on an ACWA committee in 2013 to create the ACWA Construction Site Stormwater Guide, which we distribute in our Designated Erosion Control Inspector Certification classes. The ACWA SW Site Guide was provided as an attachment to our FY19 report.

85. Provide the Erosion and Sediment Control Plan template as an attachment. *Schedule A.3.d.iv.A*

Attached: Yes ☐ No ☒

If necessary, provide an explanation:

This was provided as an attachment to our FY19 report.

86. Indicate which of the following are required for qualifying construction projects: *Schedule A.3.d.iv*

☒ Site operator required to complete a ESCP template prior to beginning construction/land disturbance
☒ Site operator required to keep the ESCP on site

☒ Site operator required maintain and update the ESCP as site conditions change, or as needed.
☒ Site operator required to provide the ESCP to the permit registrant, DEQ, or another administrating entity

If necessary, provide an explanation:

Yes, for all projects disturbing one acrea or greater.

87. ESCP templates [from construction projects that will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres)] are reviewed using a checklist or similar document to determine compliance. *Schedule A.3.d.v*

Yes ☒ No ☐

88. Provide the ESCP review template as an attachment. *Schedule A.3.d.v*

Attached: Yes ☐ No ☒

89. Indicate the minimum land disturbance where you require the ESCP to be reviewed, if different than one acre:
$ft^2$ ☐, acres ☐

If necessary, provide an explanation:

RVSS uses the DEQ provided list of required elements as a review checklist, attachment 3.4 ESCP DEQ Required Elements.

90. All construction projects [that will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres)] are expected or scheduled to be inspected at least once per permit term. *Schedule A.3.d.vi.A.1*

Indicate the number of inspections completed to comply with this requirement during this reporting year: 98

Indicate the number of inspections completed to comply with this requirement during the permit term: 194

If necessary, provide an explanation:

A total of 194 erosion and sediment control inspections have been conducted since March 1st, 2019. RVSS inspects 1200-C/CN permitted sites multiple times throughout the life of a project based on the Standard Operating Procedures outlined in SOP 9.06, attached.

91. Are construction projects with visible sediment in stormwater/dewatering discharge or when a complaint is received inspected? *Schedule A.3.d.vi.A.2*

Yes ☒ No ☐

92. Indicate number of projects that were inspected based on this inspection trigger: None

If necessary, provide an explanation:

93. Indicate the total number of construction projects that were inspected this monitoring year: 22

94. Indicate the total number of construction projects that were inspected during the permit term: 31

95. Indicate which of the following are documented during an inspection: *Schedule A.3.d.vi.B*

☐ That the ESCP is reviewed to determine if the described It is unclear what is being asked for in the highlighted text.
☒ Control measures were installed, implemented, and maintained appropriately
☒ Assessment of the site's compliance with the ordinances or requirements
☒ Visual observation of any existing or potential non-stormwater discharges, illicit connections, and/or discharge of pollutants from the site
☒ Recommendations to the construction site operator for follow-up
☐ Education or instruction provided to the site operator related to stormwater pollution prevention practices

If necessary, provide an explanation:

96. If available, provide a copy of the written or electronic inspection report form. *Schedule A.3.d.vi.B*

Attached: Yes ☒ No ☐

97. For Existing Large Communities: Indicate the number of new construction projects inspected that disturb less one acre during this monitoring year. Is this number at least 25% of the qualifying new construction sites? *Schedule A.3.d.vi.C*

None

If necessary, provide an explanation:
This requirement is not in effect until February 2023.

98. Provide the written escalating enforcement and response procedure as an attachment. *Schedule A.3.d.vii*
Yes ☒ No ☐
*(For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023)*
If necessary, provide an explanation:
See attachment 3.3, SOP 14.06.

99. Was the escalating enforcement procedure used to achieve compliance at any construction projects? *Schedule A.3.d.vii*
Yes ☒ No ☐
Indicate number of times during this reporting year: 3

100. Indicate number of times during the permit term: 8
If necessary, provide an explanation:

101. Were all persons responsible for ESCP reviews, site inspections, and enforcement appropriately trained to conduct such activities? *Schedule A.3.d.viii*
Yes ☒ No ☐
If necessary, provide an explanation:

102. Were all new staff working to implement the construction site runoff control program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.d.viii*
Yes ☒ No ☐

## 3.5 Post-Construction Site Runoff for New Development and Redevelopment

103. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.e*
RVSS has had a Stormwater Design Manual in place since 2006 that stipulates design guidelines for stormwater treatment and detention. Initially there was a large focus on manufactured devices for stormwater treatment, however since 2012 RVSS has shifted toward emphasizing the use of Low Impact Development techniques where practicable. The Design Manual is adopted by the City of Medford and Ashland as well, who both have their own MS4 permits. RVSS led a Working Group for two years to develop design guidelines for Low Impact Development BMPs that were adopted in 2018. Since March 2019, RVSS has led the Working Group through a process to draft new design guidelines to meet the retention requirements of the new MS4 permit. We are now beginning the process of revising the Design Manual text to incorporate the new requirements.

Additionally, RVSS reviews and approves stormwater management plans and conducts installation and maintenance inspections of stormwater management facilities.

104. Were the required components in place by the implementation date? *Schedule A.3.e.i*
Yes ☐ No ☐ *(Implementation date: Feb. 28, 2023 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

105. For projects creating or replacing impervious area, indicate the area (or threshold) where the site is required to implement the post-construction site runoff program requirements: *Schedule A.3.e.ii*
In square feet: 2500 $ft^2$
If necessary, provide an explanation:

106. Indicate which of the following are required at qualifying sites: *Schedule A.3.e.ii*
☒ The use of stormwater controls
☒ A site-specific stormwater management approach that targets natural surface or predevelopment hydrological function through the installation and long-term operation and maintenance of stormwater controls
☒ Long-term O&M of stormwater controls at project sites that are under the ownership of a private entity

If necessary, provide an explanation:

107. Were ordinance(s), code(s) and development standards reviewed to identify, minimize or eliminate barriers that inhibit design and implementation techniques intended to minimize impervious surfaces and reduce stormwater runoff? *Schedule A.3.e.iii*

Yes ☐ No ☒

108. If barriers were identified or if necessary, provide an explanation:

This item is not due until 2023, we will begin working on code review in the next year.

109. Provide an explanation of the timeline for removal of barriers or if removal is outside your authority:

This item is not due until 2023, we will begin working on code review in the next year.

110. Indicate which of the following technical standards are used to determine the retention requirement: *Schedule A.3.e.iv.A*

☐ Volume-based method
☐ Storm event percentile-based method
☐ Annual average runoff-based method

If necessary, provide an explanation:

RVSS is leading a working group that has developed technical standards for meeting the retention requirement. We are now beginning the process of revising the Rogue Valley Stormwater Design Manual to incorporate the new standards.

111. For projects that are unable to meet the retention requirement, is the remainder of the rainfall/runoff treated prior to discharge with a structural stormwater control? *Schedule A.3.e.iv.B*

Yes ☐ No ☐

112. Was the stormwater structural control designed to remove, at minimum, 80 percent of the total suspended solids?

Yes ☒ No ☐

If necessary, provide an explanation:

Retention requirements will be in place by the permit deadline, but are not yet.

113. Are the allowable structural stormwater controls and specifications available for review? *Schedule A.3.e.iv.C*

Yes ☒ No ☐

114. Indicate if they are attached or the location where they can be viewed:

Attached ☐

Location:

The Rogue Valley Stormwater Design Manual is available on our website.

If necessary, provide an explanation:

115. Have alternatives for projects complying with the retention requirement been approved? *Schedule A.3.e.iv.D*

Yes ☐ No ☒

116. If yes, are the written technical justifications evaluated? *Schedule A.3.e.iv.D*

Yes ☐ No ☒

117. Provide a brief description of the factors of technical infeasibility or site constraints that prevented the on-site management of the runoff amount stipulated in the stormwater retention requirement or a portion thereof. *Schedule A.3.e.iv.D*

Requirements are currently under development, but have not yet been incorporated into the stormwater design manual.

If necessary, provide an explanation:

118. Before the allowance of alternative compliance, were mitigation options established? *Schedule A.3.e.iv.E*

Yes ☐ No ☐

If necessary, provide an explanation:

Alternative compliance is not currently allowed.

119. If applicable, indicate which of the following mitigation options have been used and provide a narrative description of the implementation of the mitigation option? *Schedule A.3.e.iv.E*

☐ Off-Site Mitigation

☐ Groundwater Replenishment Projects

☐ Treatment Equivalent to the Retention Requirement

If necessary, provide an explanation:

Mitigation options are not currently provided.

120. Was a procedure developed for the review and approval of structural stormwater control plans for new development and redevelopment projects? *Schedule A.3.e.v*

Yes ☒ No ☐

If necessary, provide an explanation:

121. Indicate the minimum land disturbance or creation of new impervious area where plans are required to be reviewed: 2500 $ft^2$ ☒, acres ☐ of land disturbance ☐ creation of new impervious area ☒

122. Are all sites that use alternative compliance to meet the retention requirement reviewed?

Yes ☐ No ☐

If necessary, provide an explanation:

Alternative compliance is not currently allowed.

123. Indicate if an inventory and implementation strategy is used to ensure that all stormwater controls are operated and maintained to meet the site performance standard in Schedule A.3.e.iv of the permit? *Schedule A.3.e.vi*

Yes ☒ No ☐

If necessary, provide an explanation:

124. Indicate which of the following strategies have been developed to ensure that all stormwater controls are operated and maintained to meet the site performance standard in Schedule A.3.e.iv.: *Schedule A.3.e.vi*

☒ Legal authority to inspect and require effective operation and maintenance of privately owned and operated stormwater controls

☒ Inspection procedures and an inspection schedule to ensure compliance with the O&M requirements of each stormwater control operated by the permit registrant and by other private entities

☒ A tracking mechanism for documenting inspections and the O&M requirements for each stormwater control

☒ Reporting requirements for privately owned and operated stormwater controls that document compliance with the O&M requirement in Schedule A.3.f.

If necessary, provide an explanation:

125. Are the location of all public and private stormwater controls installed during this permit term are documented on the MS4 Map? *Schedule A.3.e.vi*

Yes ☒ No ☐

If necessary, provide an explanation:

126. Were all persons responsible for performing post-construction runoff site plan reviews, administrating the alternative compliance program, or performing O&M practices or evaluating compliance with long-term O&M requirements appropriately trained to conduct such activities? *Schedule A.3.e.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

127. Were all new staff working to implement the post-construction site runoff for new development and redevelopment program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.e.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

## 3.6 Pollution Prevention and Good Housekeeping for Municipal Operations

128. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.f*

In FY20, RVSS began reviewing and updating Standard Operating Procedures for its organization, as well as for those of its co-implementers, to bring them into compliance with the MS4 requirements.

129. Were the required components in place by the implementation date? *Schedule A.3.f.i*

Yes ☐ No ☐ *(Implementation date: Feb. 28, 2022 for Existing Registrants and Sept. 1, 2023 for New Registrants)*

130. Were O&M strategies for existing controls developed for both permit registrant-owned controls and controls owned and operated by another entity discharging to the MS4? *Schedule A.3.f.ii*

131. Yes ☐ No ☐ N/A ☐

If necessary, provide an explanation:

In process.

132. Indicate the percentage of catch basins inspected/cleaned: *Schedule A.3.f.iii*

Percentage inspected this reporting year: *Phoenix 40%* ; Percentage cleaned: 35%
Talent 30% ; Percentage cleaned: 9% (100% of this requiring cleaning)
Jackson County 433 inlets inspected and cleaned

133. If known, estimate of material removed: Phoenix 1.5 units yards
Talent 25 units cubic yards
Jackson County approximately 16 cubic yards

Percentage inspected during the permit term: *Phoenix 40%*; Percentage cleaned: 35%
Talent 30% ; Percentage cleaned: 9% (100% of this requiring cleaning)
Jackson County 433 inlets inspected and cleaned

134. If known, estimate of material removed: Phoenix 1.5 units yards
Talent 25 units cubic yards
Jackson County approximately 16 cubic yards

135. If necessary, provide an explanation:

25

136. During the permit term were existing procedures for inspection and maintenance schedules reviewed/updated to ensure pollution prevention and good housekeeping practices were conducted for the following activities? *Schedule A.3.f.iv*

☒ Pipe cleaning for stormwater and wastewater conveyance systems
☒ Cleaning of culverts conveying stormwater in roadside ditches
☒ Ditch maintenance
☒ Road and bridge maintenance
☒ Road repair and resurfacing including pavement grinding
☒ Dust control for roads and municipal construction sites
☒ Winter road maintenance, including salt or de-icing storage areas
☒ Fleet maintenance and vehicle washing
☒ Building and sidewalk maintenance including washing
☒ Solid waste transfer and disposal areas
☒ Municipal landscape maintenance
☒ Material storage and transfer areas, including fertilizer and pesticide, hazardous materials, used oil storage, and fuel
☐ Fire fighting training activities
☒ Maintenance of municipal facilities including public parks and open space, golf courses, airports, parking lots, swimming pools, marinas, etc.

If necessary, provide an explanation:

RVSS has reviewed our own procedures and has worked with the cities of Talent and Phoenix to review their procedures. In the next year we hope to revise and develop written procedures as needed.

137. Do any permit registrant-owned facilities have coverage under DEQ's 1200-Z Industrial Stormwater Discharge Permit? *Schedule A.3.f.v*

Yes ☐ No ☒ NA ☐

If "Yes", provide DEQ File Number(s):

If necessary, provide an explanation:

138. Are practices in place to reduce the discharge of pollutants to the MS4 associated with the application and storage of pesticides and fertilizers? *Schedule A.3.f.vi*

Yes ☒ No ☐

If necessary, provide an explanation:

Talent: The City of Talent adopted a revised Integrated Pest Management policy in 2018 that aimed to phase out the use of synthetic pesticides within three years. In FY2020, Talent reported no use of organic pesticides on publicly maintained property, see the attached policy 3.6 Talent IPM.

Jackson County follows an Integrated Vegetation Management plan that aims to use the most environmentally effective and economically practicable product for the targeted weed, see the attached policy, 3.6 Jackson County Roads Guidelines for Pesticide Application.

139. Are methods/practices in place to reduce the discharge of litter within the jurisdiction? *Schedule A.3.f.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

Jackson County has several litter/trash collection programs in place.

- Adopt a Road Program: 66 miles of road cleaned 2x/year, removed 181 bags of trash plus many loads of large waste items.
- Parks Department spent $21,300 on dump fees to clear 1,000cy of debris from homeless camps in the riparian area of Bear Creek.
- Community Justice Crews removed litter from 732 road miles
- A total of 2,409 miles of road were swept in FY20, this is roughly equivalent to sweeping all roads three times.

Talent

- Street sweeping of roads occurs twice per month and removed 550cys.
- Litter clean-ups along the Bear Creek riparian corridor in September removed 100 pounds of trash. A clean-up was also scheduled for April but was cancelled due to COVID-19.

Phoenix

- All streets are swept in the city; 84yards of debris were removed in FY20.
- Leaf pick-up removed 59cy of leaves.
- Bi-weekly trash clean-ups along six miles of trails in the parks removed half a cubic yard of debris.

140. Are practices in place to ensure that collected material or pollutants removed in the course of maintenance are managed and disposed of in a manner such as to prevent such pollutants from entering the waters of the state in accordance with state and federal rules? *Schedule A.3.f.viii*

Yes ☐ No ☐

If necessary, provide an explanation:

We are in the process of writing policies to cover this.

141. Were all persons responsible for evaluating O&M practices, evaluating compliance with long-term O&M requirements or ensuring pollution prevention at facilities and during operations appropriately trained to conduct such activities? *Schedule A.3.f.ix*

Yes ☒ No ☐

If necessary, provide an explanation:

For policies currently in place.

142. Were all new staff working to implement the pollution prevention and good housekeeping for municipal operations program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.f.ix*

Yes ☒ No ☐

If necessary, provide an explanation:

## 4.0 Monitoring

*If the requirement does not apply, mark "NA" and explain why it does not apply to you in the comments field.*

143. Was municipal stormwater monitoring performed at outfall locations, in the receiving waterbody, or to demonstrate compliance with this permit? *Schedule B.3*

Yes ☒ No ☐

144. If "Yes" is the data included in the Annual Report?

Yes ☒ No ☐

If necessary, provide an explanation:

### 4.1 Wood Village Monitoring Requirements

145. Provide a summary of the following to evaluate the control strategies established for the Lower Columbia Slough Phosphate, Lead, and Bacteria TMDLs: *Schedule D.1.b*

Phosphate:

Lead:

Bacteria:

146. Indicate which of the following were completed:

☐ For phosphate, monitor influent and effluent dissolved orthophosphate concentrations and total phosphate concentrations at a representative site in Fairview Lake (Reach 4) and Fairview Creek (Reach 5)

☐ For lead, estimates of the effectiveness of controls to remove TSS

☐ For bacteria, measuring E. coli concentrations and its distribution over flows (for example, flow duration intervals) to demonstrate compliance with E. coli criteria

If necessary, provide an explanation:

## 5.0 Water Quality Standards

147. During this monitoring year was it determined or reported that the MS4 discharge caused or contributed to an excursion of an applicable water quality standard? *Schedule A.1.b*

Yes ☒ No ☐

If necessary, provide an explanation:

148. How and when did the excursion of an applicable water quality standard occur? *Schedule A.1.b*

If necessary, provide an explanation:

See description of event provided for questions 66 and 67.

149. Was the excursion self-reported or did DEQ send written notification? *Schedule A.1.b*

Self-reported: Yes ☒ No ☐

If necessary, provide an explanation:

150. Within 48 hours was an investigation started into the cause of the water quality excursion? *Schedule A.1.b.i*

Yes ☒ No ☐

If necessary, provide an explanation:

151. Within 30 days of becoming aware of the excursion, was DEQ notified in writing, if self-reporting? *Schedule A.1.b.ii*

Yes ☒ No ☐

If necessary, provide an explanation:

152. Within 60 days of becoming aware of or being notified of the excursion, was a report submitted to DEQ that documents the following: *Schedule A.1.b.iii*

☒ The results of the investigation, including the date the excursion was discovered
☒ A brief description of the conditions that triggered the violation or the cause
☒ Corrective actions taken or planned, including the date corrective action was completed or is expected to be completed

If necessary, provide an explanation:

153. Were the corrective actions implemented in accordance with the schedule approved by DEQ? *Schedule A.1.b*

Yes ☐ No ☐

If necessary, provide an explanation:

No schedule was provided by DEQ, RVSS completed corrective action in less than a week.

154. Provide any additional comments or narrative description, if necessary:

## Appendix Table of Contents

## Appendix A: Section 2.0 General Information

### Section 2.3 Table 1. MS4 Receiving Water Body 303d and TMDL Information

**Table 1. RVSS MS4 Receiving Water Body 303d and TMDL listings *, **.**

| Stream | Sub-Stream | RVSS Stream code | Total Outfalls | Last sampled (calendar year) | 303d listed Y/N | Impairment | TMDL Y/N | Impairment |
|---|---|---|---|---|---|---|---|---|
| Rogue River | | 0 | | | Y | DO, mercury | Y | Fecal coliform, Temp. |
| Bear Creek | | 1 | 15 | 2019 | Y | Arsenic, DO | Y | aquatic weeds, DO, pH, E. coli, P, Temp. |
| Willow | | 2 | | | | | N | |
| Jackson | | 4 | 30 | 2013 | Y | Biological criteria, DO | N | Fecal coliform, Temp. |
| | Dean | 5 | | | N | | N | |
| | Horn (W Fork Jackson) LLID 1229318423752 | 6 | 30 | 2018 | Y | DO | Y | E. coli |
| Griffin | | 7 | 66 | 2013 | Y | DO, pH | Y | DO, fecal coliform |
| | Daisy | 8 | 24 | 2018 | N | | N | |
| Mingus | | 9 | 65 | 2018 | N | | N | |
| Elk | | 10 | 13 | | N | | N | |
| Lone Pine | | 11 | | | Y | DO, pH | Y | Temp., E. coli |
| Hopkins Canal | | 12 | | | N | | N | |
| | Bear Cr Feeder Canal | 13 | | | N | | N | |
| | Coker Butte Canal | 14 | | | N | | N | |
| Crooked | | 15 | 7 | 2018 | N | | N | |
| Gore | | 20 | 5 | 2018 | N | | N | |
| Coleman | | 21 | 11 | 2015 | N | | Y | DO, E. coli, fecal coliform, Temp. |
| Payne | | 22 | 8 | 2015 | N | | Y | DO, fecal coliform, Temp. |
| East Main Canal | | 23 | | 2016 | N | | N | |
| Anderson | | 24 | 1 | 2015 | N | | N | |
| Phoenix Canal (West Main canal) | | 26 | 9 | 2016 | N | | N | |
| Wagner | | 27 | 24 | 2016 | Y | DO | Y | E. coli, Temp. |
| Meyer | | 28 | | | N | | Y | Fecal coliform, Temp. |
| Talent Canal | Canal | 29 | | | N | | N | |
| Butler | | 30 | | | N | | Y | DO, Temp., Fecal Coliform |
| Lower East Canal | | 32 | | | N | | N | |

**Table 1. RVSS MS4 Receiving Water Body 303d and TMDL listings *, **.**

| Stream | Sub-Stream | RVSS Stream code | Total Outfalls | Last sampled (calendar year) | 303d listed Y/N | Impairment | TMDL Y/N | Impairment |
|---|---|---|---|---|---|---|---|---|
| Neil Creek | | 44 | | | N | | Y | Do, E. Coli, Temp. |
| Emigrant Creek | | 45 | | | N | | Y | Temp., P |
| Upton Slough | | 35 | 2 | | N | | N | |
| | Upton Lateral | 36 | | | N | | N | |
| | Coker Butte Lateral | | | | N | | N | |
| Whetstone | | 37 | 4 | | N | | N | |
| | Ave. A Trib./Agate Slough | 41 | 5 | 2018 | N | | N | |
| | Swanson | 42 | | 2018 | N | | N | |
| | N. fork of Whetstone: LLID 1228851424204 | 43 | 1 | 2018 | Y | aquatic weeds/ algae | N | |
| Little Butte | | 38 | | | N | | N | |
| | Dutton Pond | 39 | | | N | | N | |
| Denman | | 40 | | | N | | N | |
| | **Total outfalls** | | **335** | | | | | |
| | **Total without CP** | | **67** | | | | | |
| | 40% of outfalls screened by 2022 | | 26.8 | | | | | |
| | 20% screened each subsequent y | | 33.5 | | | | | |

*303d and TMDL status listings as of September 2019.

**Based on MS4 boundary prior to Central Point secession.

## APPENDIX B: Section 3.1 Public Education and Outreach Documentation

Question 27. RVCOG Annual Report of E and O Activities 2019-2020 Question 29. Table 2. RVSS Public Education and Outreach Events for FY20

**Table 2. Rogue Valley Sewer Services Public Education and Outreach EVENTS FY 2020**

| Event | Audience | Location | Date | People contacted directly |
|---|---|---|---|---|
| Phoenix Parks "Dog Days" community event | all ages | Phoenix | 7/20/2019 | 25 |
| Storm drain art planning & implementation | residents, artists, city staff/council | Talent | August | 30 |
| Salmon Watch instructor training | adults | Medford | 9/10-9/11 | 20 |
| Talent Harvest Fest community event | all ages | Talent | 9/21/2019 | 70 |
| Salmon Watch classroom presentation | youth | Talent | 9/17/2019 | 50 |
| Salmon Watch classroom presentation | youth | Medford | 9/18/2019 | 80 |
| Salmon Watch field trip | youth | Upper Rogue | 9/23/2019 | 50 |
| Salmon Watch classroom presentation | youth | Talent | 9/24/2019 | 50 |
| SOLVE clean-up event @ park | adults | Talent | 9/28/2019 | 10 |
| SOLVE clean-up event @ park | all ages | Phoenix | 9/28/2019 | 9 |
| Hazardous Materials Spill Response Training | multi-jurisdictions public works employees | Talent | 10/1/2019 | 53 |
| Salmon Watch classroom presentation | youth | Talent | 10/15/2019 | 40 |
| classroom presentation | youth | Medford | 10/18/2019 | 88 |
| Salmon Watch field trip | youth | Medford | 10/21/2019 | 60 |
| field trip Bear Cr. Park | youth | Medford | 10/22/2019 | 44 |
| field trip Bear Cr. Park | youth | Medford | 10/24/2019 | 44 |
| Salmon Watch field trip | youth | Phoenix | 10/24/2019 | 54 |
| stormwater presentation, tour of facilities, maintenance | youth | Talent | 10/24/2019 | 25 |
| Salmon Watch field trip | youth | Talent | 10/30/2019 | 30 |
| Erosion Control Inspector Recertification | Contractors | RVSS | 11/5/2019 | 14 |
| Erosion Control Inspector Certification | Contractors | RVSS | 11/12/2019 | 29 |
| stormwater presentation, tour of swale, facility maintenance | youth | Talent | 11/14/2019 | 40 |
| maintenance of swales | adults (City Council) | Talent | 11/20/2019 | 5 |
| stormwater presentation, tour of facilities, facility maintenance | youth | Talent | 11/21/2019 | 40 |
| presentation at STEAM event @ middle school | youth & adults | White City | 12/12/2019 | 30 |
| stormwater lesson @ middle school | youth | White City | 1/22/2020 | 140 |
| **TOTAL CONTACTS FOR FY20** | | | | **1,130** |

This report outlines the public education, outreach, involvement, and participation strategies that municipal separate storm sewer systems (MS4s) in the Middle Rogue Basin implemented from July 1, 2019 to June 30th, 2020 to satisfy the conditions of the NPDES Phase II general permit issued by DEQ on November 30, 2018. The activities form a framework that is being integrated into the Stormwater Management Plans (SWMPs) being created by the MS4s. Activities completed are applicable to the regulated small (Phase II) MS4s and include established MS4s (Existing Registrants) and new permittees (New Registrants). In the Middle Rogue Basin, the registrants include; the Cities of Medford and Ashland, Rogue Valley Sewer Services (including Cities of Talent and Phoenix and Jackson County), Cities of Grants Pass, Eagle Point, Central Point, and Rogue River and Josephine County.

The majority of the activities covered in this report are funded by the Bear Creek MS4s (Medford, Ashland, Central Point, and RVSS (representing Phoenix, Talent, and Jackson County)) with a few exceptions that include Grants Pass, Josephine County, and/or Eagle Point.

**Program Highlights**

- The top 10 Stream Smart Pages received over 3,500 visits (3,859 visits)
- Completed a redesign of the Stream Smart website working with a technical team and web consultant. The page is undergoing some final edits and should be live in the Fall of 2020.
- Over 750 brochures, post cards, stickers, and activities (e.g., word searches, mazes) were distributed at events, local libraries, front counters, partner offices, at meetings, and other locations.
- Participated in and helped coordinate a volunteer clean-up in September. The April 2020 clean-up was postponed until the Fall due to COVID19. *167 participants.*
- Conducted an on-air program with the Jefferson Exchange in August 2019 to promote the Stream Smart Program, the Bear Creek Fall Festival, Salmon Watch, and the Bear Creek Clean ups.

## PUBLIC EDUCATION & OUTREACH (PE/PO)

*General Program/Activity Description*

The PE/PO program is designed to develop, refine, and implement an education and outreach program to inform the public about the impacts of stormwater discharges on waterbodies and the steps that they can take to reduce pollutants in stormwater runoff consistent with the recommendations of the general permit and SWMPS. The goal of program activities is to educate residents on ways to reduce the behaviors and practices that cause or contribute to adverse stormwater impacts on receiving waters and provide steps that citizens, businesses, and others can take to reduce pollutants in stormwater runoff and prevent illicit discharge from entering the MS4 impacted receiving waters.

Work completed in 2019-2020 is based off the draft SWMP guidance created with the regional stormwater team and RVSS (http://rvcog.org/wp-content/uploads/2017/01/SWMP-Draft-June-28th-2019.pdf).

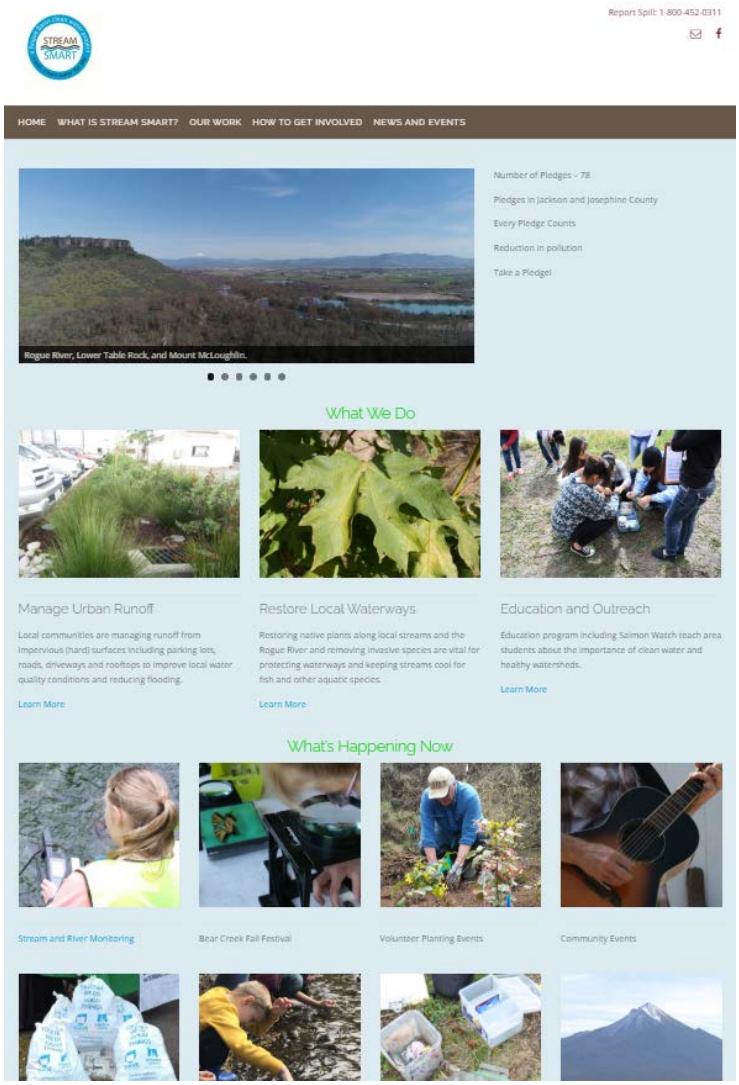
**Work Completed in 2019-2020**

*Stream Smart*

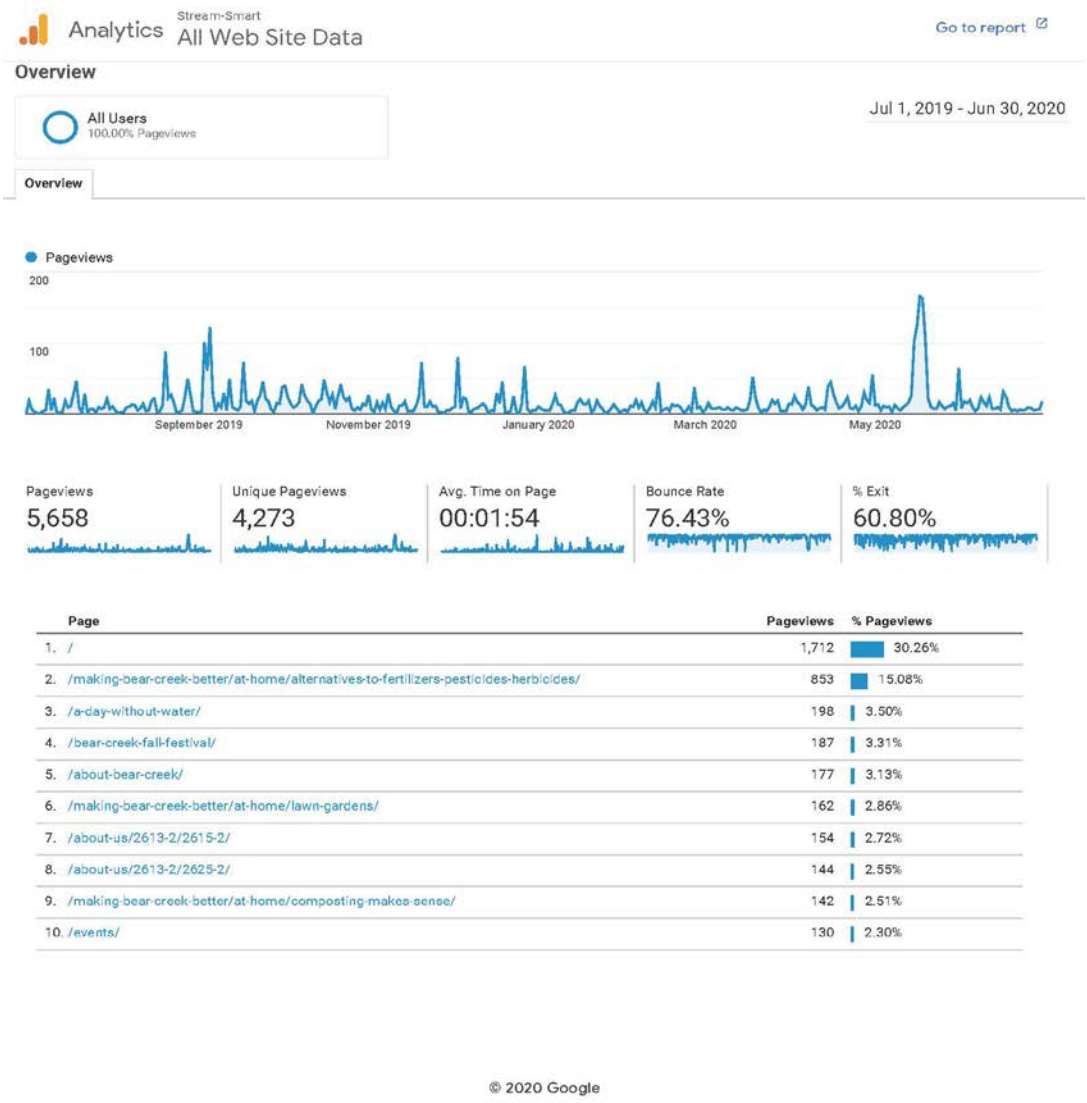
MS4s provide funding for the Stream Smart activities below and most also serve as members of the Advisory Committee to help direct program activities. Most of the Stream Smart activities (e.g., bylaws) are done in collaboration with one or more of the Stream Smart Partners or supporting organizations. The partner list at the end of the document includes organizations participating in Stream Smart Programs.

Activities included holding 4 quarterly Stream Smart meetings and 2 website working group meetings in addition to the sponsored activities, program participation, and events. Major accomplishments for the program included a major renovation of the website (http://test.stream-smart.com/) set to go live in the fall of 2020, drafting of bylaws for the program, adding in additional partners (Rogue Drinking Water Partnership (RDWP) and the Pesticide Stewardship Partnership (PSP)), an addition pledge campaign (Pesticides), social media postings, creating new website content and revising existing content, updating a survey and collecting additional data, and linking a number of events and programs under the stream smart umbrella.

The figure below shows the revised home page for Stream Smart including the new menu bars, information highlights including programs, relevant news articles, and what is happening now.




We had almost 4,000 visitors to the top ten pages of the website. The top ten pages included pesticide and herbicides, A Day Without Water, The Bear Creek Fall Festival, about Bear Creek, Composting, and events (see figure below).




*Stream Smart Survey*

In the Spring of 2020, a Stream Smart survey that was initially developed in building the program was updated and sent out. The survey was revisited as part of activities that people could do at home during the COVID19 quarantine. It was included part of Stream Smarts social media postings, a link was posted on the website, and emails were sent out to several groups. The goal of the survey was to see if

perceptions have changed over time in terms of stream and river health and if there was evidence that our messaging was reaching local residents. We received 36 responses from the community. Results are being evaluated and will be used to inform the program and potentially future decisions as to the effectiveness of outreach efforts, what methods connect with people, and other decisions. A summary of selected responses is presented below.

*General Information*

| Questions | Results |
|---|---|
| On a scale of 1-10 with "1" being completely polluted and "10" being completely clean, how would you rate the water quality of streams in the Rogue River Basin? | 6.1 |
| How often do you wash your car at a carwash | Every Few Months (48.5%) |
| How often do you or your landscaping service use weed killer or insect control products, such as Round Up, Weed and Feed, or insecticides | Never (77%) |
| How often do you notice evidence of pet droppings around your neighborhood | Every Day (42.4%) |

Based on the results from the table above, general water quality is considered above average. The general response we hear is that Rivers (Rogue, Applegate, Illinois) are considered to be clean and high quality waters where smaller streams, especially in urban watersheds (e.g., Bear Creek) have poorer water quality. Residents are participating in activities that help improve water quality (e.g., not using pesticides/insecticides, using car washes). Some activities (e.g., picking up after your pets) continue to need more work since the results showed that around 90% of the respondents noticed pet droppings in their neighborhood.

*Where residents get their information (Rank is indicated by the number in parenthesis next to the source)*

| From what sources have you received information about local stream and river quality issues? (check all that apply) | Number of Responses |
|---|---|
| Newspaper (Rank 4) | 15 |
| Brochures (8) | 9 |
| Radio (7) | 10 |
| Public Events (1) | 20 |
| TV (10) | 5 |
| Word of Mouth (2) | 19 |

| | |
|---|---|
| Kids/school materials (11) | 4 |
| Signs (3) | 16 |
| Billing inserts (9) | 7 |
| Newsletters (6) | 12 |
| Meetings (5) | 13 |

As we have found with previous surveys, residents get their information from a wide variety of sources with public events, word of mouth, and signs being the largest sources.

*What methods of information distribution are supported*

| Support of Information Distribution | Results |
|---|---|
| General pollution prevention information in the newspaper, TV and Radio. | 8.86 |
| Mailing information to individuals | 5.17 |
| Providing information on an insert in your water and sewer bill | 8.1 |
| Strengthen regulations and enforcement | 8.2 |
| Sponsoring community involvement and clean ups | 9 |
| Providing technical assistance and workshop training | 8.6 |
| Providing money-saving deals for the purchase of environmentally friendly products | 9.2 |
| Volunteers coming to your home to help with planting and clean up | 7.8 |

Rate 1 (lowest) to 10 (highest) level of support for receiving information

Residents are supportive of a wide range of information distribution with the exception of direct mailing (5.17).

*Behavior Motivators*

| Which of the following would be the most effective way to encourage people to NOT dispose of their yard waste or litter in storm drains, creeks, or rivers? | Number of Responses |
|---|---|
| Educate them on why NOT to dump items in the storm drain and other waterways | 25 |
| A reduction in yard waste fees | 18 |
| Complaints from neighbors | 8 |
| Knowing it will protect public health | 9 |
| Knowing it will protect water quality | 14 |
| Knowing it will protect wildlife habitat | 7 |
| Something else | 8 |

| Which of the following would most encourage people to use a carwash? | Number of Responses |
|---|---|
| Provide discounts or coupons for carwashes | 28 |
| Knowing they use recycled water | 17 |
| Knowing it would protect water quality | 17 |
| Knowing it would protect public health | 10 |
| Knowing it would protect wildlife habitat | 10 |
| Adding more carwash locations | 2 |
| Something else | 2 |

| Which of the following would most likely encourage people to clean up after their dogs more often? | Number of Responses |
|---|---|
| Free scooper and/or bags at the site | 24 |
| More disposal locations throughout the park or on trails | 20 |
| Complaints from neighbors | 9 |
| Knowing how it protects public health | 20 |
| Knowing how it protects family's health | 15 |
| Knowing how it protects water quality | 17 |
| Knowing how it protects wildlife habitat | 9 |
| Something Else | 5 |

| Which of the following would most encourage people to reduce the size of their grass lawns by using native plants, trees and landscaping? | Number of Responses |
|---|---|
| Discounts or coupons for native plants | 20 |
| Technical support (onsite expertise, advice, classes) | 20 |
| Time to work on it | 14 |
| If the neighbors did it | 17 |
| A list of native plants | 15 |
| Knowing it would protect water quality | 12 |
| Knowing it would protect public health | 10 |
| Knowing it would protect wildlife habitat | 8 |
| Something else | 2 |

| Which of the following would most encourage people to use less toxic weed and bug control methods? | Number of Responses |
|---|---|
| A list of natural or non-toxic products | 19 |
| A better understanding of the benefits | 16 |
| A reduction of the price of less toxic alternatives | 16 |
| Convenient access to less toxic products | 18 |
| Knowing it would protect water quality | 15 |
| Knowing it would protect your family's health | 17 |
| Knowing it would protect public health | 9 |
| Knowing it would protect wildlife | 9 |
| Something else | 3 |

Based on the number of responses, education influences behavior change for a number of activities including illegal dumping (not disposing of materials in storm drains and creeks), using non-toxic alternatives for controlling weeds and bugs, for reducing the size of lawns, and for maintaining native landscaping. In addition, incentives (discounts or coupons for car washes, native plants, and free scooper/bags at the site) resonated as motivators for changing behavior. Protecting public health, family health, and wildlife ranked low based on the number of responses and protecting water quality was ranked in the middle. As a result, it is recommended that we re-evaluate motivators for behavior as part of our Stream Smart work.

*Salmon Watch*

Conducted another season of Salmon Watch in the Fall of 2020. Classes were held in September, October, and early November (November 5th). Overall, 27 field days were conducted with 48 classes and over 1,400 students. Classes included schools from the Bear Creek Valley and Greater Jackson County. 17 organizations, agencies, and municipalities donated their time to the program and provided in kind match to the program. The match reduces program costs and also allows us to leverage grant funding for the program. Details on the class dates, field

locations, schools involved, number of students, and other information (e.g., volunteer instructors) can be found in Table 1.1.

In addition, the 2019 Salmon Watch Program received financial support from the Gray Family Foundation for a second year (of a potential 3). Additionally, we worked with the Army Corps of Engineers to develop a plan for the long term use of McGregor Park for the Salmon Watch Program. The Corps is a new partner for the program.

In addition to the field classes, a number of other activities were conducted as part of the program. Activities included an instructor training held on September 10th and 11th for both contracted educators and volunteer instructors, recruiting schools and instructors through emails, personal contacts, at the August Institute, and other events, program advertising and marketing, completing before and after program surveys, providing in school presentations (limited), coordinating logistics for the program (schools, sites, programs, and instructors), obtaining permits for site use at State Parks (Tou Velle and Valley of the Rogue), managing contracts for instructors, providing reimbursements for program expenses (transportation, parking fees, and program equipment and supplies), maintaining and stocking kits, coordination of a Powerhouse Tour with the Army Corps of Engineers, and other logistics.

The Salmon Watch program page and resources are housed on the Stream Smart page.

https://www.stream-smart.com/about-us/2613-2/2615-2/

http://test.stream-smart.com/our-work/programs-and-projects/rogue-basin-salmon-watch/

A detailed Salmon Watch Report was also completed for the program.

**2019 Field Day Statistics**

Table 1.1 summarizes all of the Salmon Watch classes completed in the fall of 2019. The table contains information on the dates, field locations, schools/districts, number of students, grade levels, number of classes, and contributing partner organizations (volunteer instructors).

**Table 1.1: 2019 Salmon Watch Field Trip Information**

| Date | Location | School/District | # Students | Grade | # Classes | Contributing Partners |
|---|---|---|---|---|---|---|
| Sept. 23 | McGregor | Kennedy Elementary School | 30 | 4th | 1 | RVSS, ODFW, BLM |
| Sept. 24 | McGregor | Orchard Hill Elementary School/Talent Elementary School | 60 | 4th | 2 | BCWEP, RVCOG, ODFW |
| Sept. 25 | McGregor | Orchard Hill Elementary School | 60 | 4th | 2 | RVCOG,TFT |
| Sept. 26 | McGregor | Talent Elementary School | 60 | 4th | 2 | BCWEP, JSWCD, RRK |
| Sept. 27 | McGregor | Kennedy Elementary School | 60 | 3rd/4th | 2 | BCWEP, BLM |
| Sept. 30 | Griffin Creek | Scenic Middle School* | 296 | 8th | 10 | RVCOG, CP |
| Oct. 1 | Griffin Creek | Scenic Middle School* | - | 8th | - | BCWEP, RVCOG |
| Oct. 1 | McGregor | LOGOS | 40 | - | - | BCWEP, TFT, RRWC, BLM |
| Oct. 2 | McGregor | North Medford High School | 55 | - | - | BCWEP |
| Oct. 3 | Griffin Creek | Scenic Middle School* | - | 8th | - | BCWEP, RVCOG |
| Oct. 3 | Bear Creek | Roosevelt Elementary School | 60 | 5th | - | BCWEP, JSWCD, RRWC |
| Oct. 4 | Griffin Creek | Scenic Middle School* | - | 8th | - | RVCOG, CP |
| Oct. 4 | McGregor | Bellview Elementary School/Talent Elementary School | 60 | 3rd/4th | 2 | BCWEP, TFT |
| Oct. 8 | Cantrall Buckley | Helman Elementary School | 54 | 5th | 2 | BCWEP, JSWCD, APWC |
| Oct. 9 | Tou Velle | McLoughlin Middle School | 80 | 6th | - | BCWEP, MWC, Medford |
| Oct. 10 | Tou Velle | McLoughlin Middle School | 80 | 6th | - | BCWEP, MWC, RVCOG, Medford |
| Oct. 15 | Cantrall Buckley | Talent Elementary School | 60 | - | 2 | APWC |
| Oct. 16 | Cantrall Buckley | Ruch Outdoor Community School | 26 | 8th | - | |
| Oct. 17 | Lynn Newbry | Walker Elementary School | 23 | - | - | BCWEP, RRK |
| Oct. 21 | Bear Creek | Cascade Christian High School | 45 | - | 2 | RVSS |
| Oct. 22 | Cantrall Buckley | Mae Richardson Elementary School | 50 | 3rd | 2 | |
| Oct. 23 | North Mountain | Walker Elementary School | 60 | - | 2 | BCWEP, RRK |
| Oct. 24 | Blue Heron | Talent ODP | 54 | K-5 | 2 | BCWEP, RVSS |

| | | | | | | |
|---|---|---|---|---|---|---|
| Oct. 29 | Cantrall Buckley | Mae Richardson Elementary School | 50 | 3rd | 2 | |
| Oct. 30 | Lynn Newbry | Talent ODP | 30 | - | 1 | BCWEP, RVSS |
| Oct. 31 | Valley of the Rogue | Shady Cove School | 30 | - | 1 | BCWEP, RRWC |
| Nov. 5 | Valley of the Rogue | Rogue River Elementary | 70 | - | - | TFT |

**Table 2: Key to Instructional Partners**

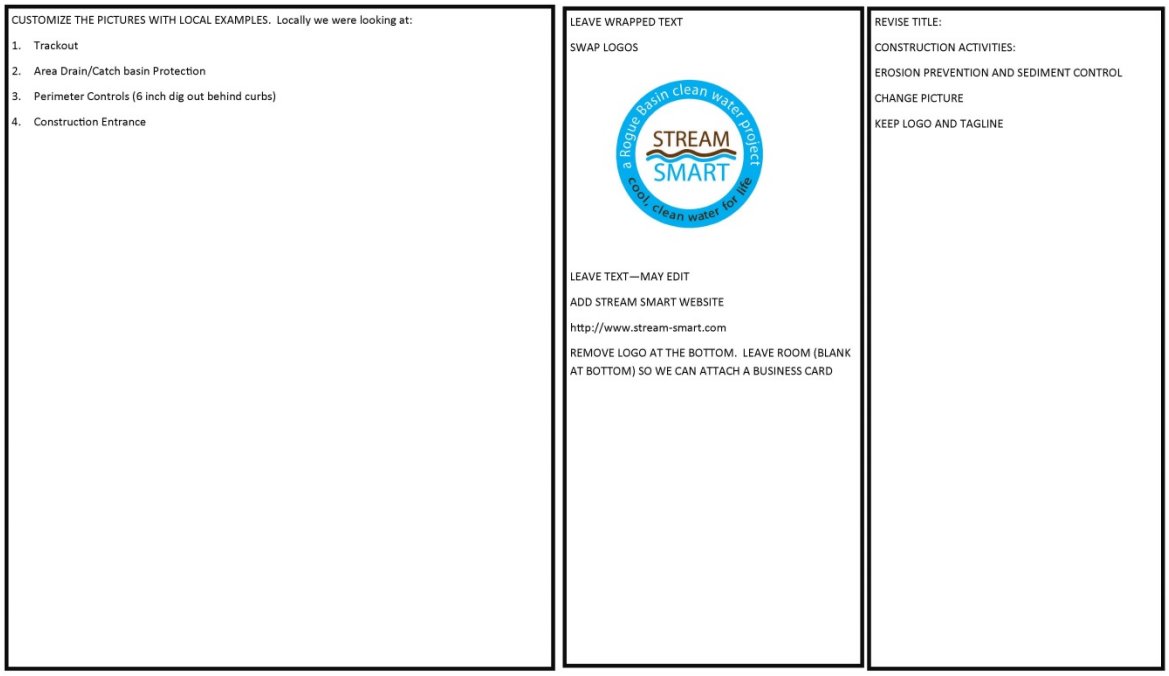
| | |
|---|---|
| APWC | Applegate Partnership and Watershed Council |
| BLM | U.S. Dept. of Interior, Bureau of Land Management |
| CP | City of Central Point |
| JSWCD | Jackson Soil & Water Conservation District |
| Medford | City of Medford |
| MWC | Medford Water Commission |
| ODFW | Oregon Dept. of Fish & Wildlife |
| OSU Ext. | Oregon State Univ. Extension |
| RBP | Rogue Basin Partnership |
| RRED | Rogue River Education District |
| RRK | Rogue Riverkeeper |
| RRWC | Rogue River Watershed Council |
| RVCOG | Rogue Valley Council of Governments |
| RVSS | Rogue Valley Sewer Services |
| SFI | Siskiyou Field Institute |
| TFT | The Freshwater Trust |
| BCWEP* | Bear Creek Watershed Education Partners (*Volunteers – Former Board Members) |

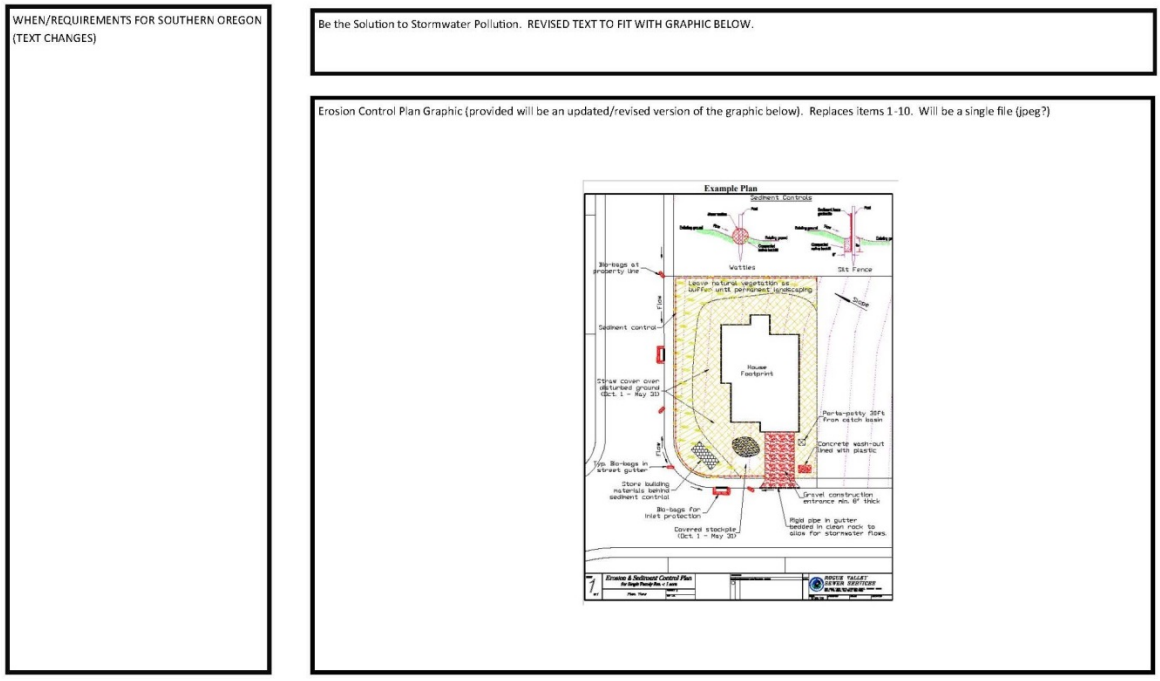
*Erosion Prevention and Sediment Control Brochure*

Work began on an Erosion Prevention and Sediment Control brochure that would be available at front counters with a target audience of Engineers, Planners, and Contractors. The brochure is being modified from a template from Goldstreet Designs for our region through a working group consisting of members from all permitted MS4s.

Working meetings with the review team were convened in April and June 2020. In addition, RVCOG worked created a draft template for the brochure based on meeting discussions and also talked with GoldStreet about design needs including what information and formats needed for completing the brochure. The brochure is anticipated to be completed in 2020-2021.

May 2020 Draft






*Brochure Distribution*

Brochures were distributed at events, activities, provided to front counters/offices, sent to local libraries, and some local businesses.

*Working with local schools*

The Regional Phase II program promotes, coordinates, creates, updates, and maintains materials, equipment to lend to schools including education kits, microscopes, and other resources. In addition, the program also works with schools directly for presentations.

| Date | School | Equipment | Number of Participants |
|---|---|---|---|
| 10/4/19 | McLoughlin Middle School | Macro Kits for Field Day | Counted in Events |
| 10/24/19 | Talent Middle School | Tools (shovels, fire rakes, etc.) | 25 |
| 10/25/19 | OSU (Stream Watershed Assessment Team) | Macro kits, WQ Kits | 20 |
| 11/14/19 | Talent Middle School | Tools (shovels, fire rakes, etc.) | 25 |
| 11/20/19 | Ashland Elementary | WQ Kit | 25 |
| 12/3/19 | OSU (Stream Watershed Assessment Team) | Macro kits, WQ Kits | 20 |
| 11/20/19 | Ashland Elementary | WQ Kit | 25 |
| | | ***Total*** | ***140*** |

Equipment was reserved for the Applegate Partnership and Watershed Council Programs (4 days) at Cantral Buckley in the spring of 2020 (all 4 Salmon watch Kits), and for SOLC's Living on Your Land Program (3-4 Days). Due to COVID19, all programs were cancelled.

**PUBLIC INVOLVEMENT & PARTICIPATION (PI/PP)**

*Description*

The PI/PP program is designed to provide opportunities for the public to participate in the development of the SWMP control measures.

**Work Completed in 2019-2020**

*SWAT Meetings*

Quarterly SWAT meetings were held in July, October, January, and April. Updates on the PE/PO and PI/PP programs were provided at all 4 meetings,

*Bear Creek Clean-ups*

Clean-ups are conducted with the Bear Creek Stewards as part of the Adopt-A-River Program. The Bear Creek Stewards is a collaboration of individuals and organizations including RVCOG, MS4s, DMAs, and Stream Smart members that promote a thriving Bear Creek Greenway corridor through the convergence of art, environmental stewardship and recreation. RVCOG has been a key player and organizer in the Clean-ups on behalf of the Stormwater and TMDL Programs. Since 2015, the group has organized a Bear Creek Stewardship Day every April and September (except for September 2020 due to COVID).

The Bear Creek Stewards hosted a Bear Creek Stewardship Day on September 28th, 2019 as part of the Stop Oregon Litter and Vandalism (SOLVE) sponsored Beach & Riverside Cleanup. 167 volunteers that removed more than 3,345 pounds of trash, planted more than 420 plants, and removed Himalayan blackberry during the event. Table 2.1 shows the event statistics.

The event ran from 9 am-12 pm at 11 check-in locations along or near Bear Creek from Central Point to Ashland. The organization or municipality indicated in the parentheses indicates the lead at each check in location which at many locations were partners.

1. SORV/Expo, Central Point. (Jackson County)
2. Pine Street, Central Point. (RVCOG)
3. McAndrews Road, Medford. (City of Medford)
4. Hawthorne Park, Medford. (Rogue Riverkeeper)
5. Bear Creek Park, Alba Dr., Medford. (Medford Food Co-op)
6. CTNC, Medford. (RRWC)
7. Colver Road Park, Phoenix. (City of Phoenix and RVSS)
8. Lynn Newbry Park, Talent. (RVCOG)
9. Wranglers Arena, North Ashland. (Southern Oregon Geocaching and City of Ashland)
10. Ashland Creek Park, Ashland. (Ashland Food Co-op and Ashland Parks and Rec)
11. Wagner Park, Talent. (City of Talent and RVSS)

*Photos and Event Statistics*


Table 2.1: Event Statistics

| | Fall 2019 Clean-Up Event Registration | | | |
|---|---|---|---|---|
| **Location/Date:** | **Attended** | **Adults** | **Minors** | **Pounds of Trash** |
| SORV/Expo Center | 3 | 2 | 1 | 60 |
| Pine Street | 16 | 14 | 2 | 500 |
| McAndrews Road | 25 | 17 | 8 | 1310 |
| Hawthorne Park | 20 | 16 | 4 | 500 |
| Bear Creek Park | 36 | 21 | 15 | 450 |
| Coyote Trails Nature Center | 9 | 6 | 3 | 100 |
| Colver Road Park | 9 | 7 | 2 | 0 |
| Lynn Newbry Park | 25 | 12 | 13 | 100 |
| Wranglers Arena | 10 | 8 | 2 | 300 |
| Ashland Creek Park | 4 | 3 | 1 | 0 |
| Wagner Park | 10 | 10 | 0 | 25 |
| Total | **167** | **116** | **51** | **3345** |

| | | |
|---|---|---|
| **123%** | **69%** | **31%** |
| **Attended vs registered** | **were adults** | **were under 17** |

| | |
|---|---|
| **79%** | **21%** |
| **registered on BCS** | **registered on SOLVE** |

**Agencies, Groups, and funders that RVCOG worked with on stormwater and water quality issues and volunteering for program activities:**

- OSU Extension Service - E
- Rogue River Watershed Council (RRWC) – E, CU, STS, V
- Rogue Basin Partnership (RBP) – D, V
- Local schools – elementary, middle school, and high school, public and private – V, E
- Local Scouts (clean-ups) - V
- Jackson Soil and Water Conservation District (SWCD) – E, STS, D, CU
- Rogue Riverkeeper (RRK) – E, V, STS, CU
- Medford Water Commission – E, STS
- SOLVE – D, V, CU
- Gordon Elwood Foundation – D, CU, E
- Local communities (Ashland, Talent, Phoenix, Medford, Central Point, Jacksonville, Grants Pass, and Rogue River) – STS, E, V
- Jackson and Josephine Counties – STS, E
- Local Geocachers – V, CU
- Illinois Valley Watershed Council and SWCD – STS, E
- Rogue Drinking Water Partnership - STS
- Medford Food CO-OP – D, CU,
- Ashland CO-OP – D, CU

Support Key:

STS – Stream Smart

E – Events

CU – Clean-ups

D – Donation for programs (clean-ups, events)

V – Volunteers (part of volunteer work base providing labor, staffing for check in locations)

## APPENDIX C: Section 3.3 Illicit Discharge Detection and Elimination

Question 57. RVSS SOP 14.06 for Escalating Enforcement

Question 59. Table 3. Hotline Tracking

# Standard Operating Procedures

**Title:** **14.06 Stormwater Quality Enforcement**

**Department:** **Stormwater**

**Approved by:** **Carl Tappert, Manager**

**Responsible Person:** **Stormwater Program Manager**

**Participants:** **Stormwater and Engineering Dept.s**

**Background:** Rogue Valley Sewer Services Code Section 4.05.100 identifies prohibited discharges and other activities that affect stormwater quality. This section of code can be enforced by Section 8.50 which establishes penalties for code violations including Stop Work Orders and monetary penalties of up to $2,000 per day per violation. As the holder of the NPDES Phase II permit, and an agent of DEQ for the enforcement of the RVSS Construction & 1200-C permits, Rogue Valley Sewer Services is responsible for enforcing stormwater protection requirements within the Phase II area (See RVSS website). In late 2008, RVSS started issuing Stop Work Orders and monetary penalties for construction sites with a discharge or imminent threat of a discharge. Prior to this time, RVSS conducted education classes and issued Brown Tags to encourage compliance with the Stormwater Ordinance. The different levels of violation and appropriate enforcement actions are defined below:

**Point of Contact for Violation:** All correspondence pertaining to a violation will be conducted through the following responsible persons as described below.

- Erosion and Sediment Control Inspector and Property Owner or Developer for RVSS Construction and 1200-C permitted sites.
- Contractor or Property Owner for non-RVSS Construction and 1200-C permitted sites.

**Acceptable Offsite Soil Transport:** Soil leaving a jobsite uncontrolled shall not exceed 0.3 cubic foot per day per acre.[1] (0.3 Cu. Ft/(day*acre)

**Violation Class - Threat:** A threat exists when site conditions have the potential to discharge pollutants into the stormwater system, and/or when stormwater protections,

[1] based on the Modified Universal Soil Equation as Calculated with the USDA-NCRS RUSLE2. The Following assumptions apply, Jackson County Oregon, long flat site profile, long term vegetation-weeds/blade cut, silty loam.)

known as BMPs, have not been installed in accordance with an approved Erosion and Sediment Control Plan or Action Plan.

> **Enforcement Action:** The violator will be issued a Brown Tag by either an RVSS Inspector or Stormwater Coordinator which will identify the site deficiencies. If requested by the violator, an Inspector or Stormwater Coordinator will arrange a site visit to discuss actions needed to correct the threat. RVSS staff will re-inspect the site within the time frame specified on the Brown Tag. If the threat has not been corrected, a second Brown Tag or Stop Work Order will be issued. Stop Work Orders will be issued under the direction of the District Engineer or Stormwater Coordinator.

**Violation Class – Imminent Threat:** A threat becomes imminent when threat conditions exist and there is rain predicted within the next 24 hours.

> **Enforcement Action:** The violator will be issued a Brown Tag and/or Stop Work Order. The Brown Tag will be issued by an Inspector or Stormwater Coordinator. The Stop Work Order will be issued by the Inspector only with the Stormwater Coordinator or District Engineers verbal approval and will include specific actions that must be taken and a time limit for completion of these actions. The time limits imposed will be based on the extent of the threat, the amount of rain predicted, and the amount of time before the predicted rain. Failure to comply with the Stop Work Order will result in the issuance of a Notice of Non-Compliance with an assessment of a monetary penalty by the Stormwater Coordinator with verbal approval of the District Engineer.

**Violation Class – Illicit Discharge:** A violation occurs when pollutants are discharged into the stormwater system.

> **Enforcement Action:** The violator will be issued a Brown Tag, Stop Work Order and/or a Notice of Non-Compliance including a monetary penalty by RVSS as described above. The violator may be ordered to take remedial action to clean the stormwater system of any pollutants that are discharged. The monetary penalty may be imposed for each day that the remedial action is incomplete, or may be issued for a specific number of days. If significant environmental harm or a large economic benefit resulted from non-compliance the violator will be referred to DEQ.

**Violation Class – Willful Discharge:** A discharge may be considered willful when any of the following conditions exist:

- The discharge is intentional (i.e. dumping paint into a storm drain)
- The discharge is caused by action or inaction that could be reasonably expected to cause a discharge of pollutants.

- An approved Erosion and Sediment Control Plan or Action Plan was not properly implemented.
- The violator has been issued a Brown Tag for a Threat or Imminent Threat and has not corrected the violation. (This criteria is not site-specific. For example, if a landscape contractor is issued a Brown Tag for failing to protect inlets in White City, then causes a discharge for a similar situation in Central Point, the second discharge will be considered a Willful Discharge).

  **Enforcement Action:** The violator will be issued a Stop Work Order and/or Notice of Non-Compliance and may be issued an assessment of a monetary penalty as described below. The violator will be ordered to take remedial action to clean the stormwater system of any pollutants that are discharged. The monetary penalty will be imposed for every day until the remedial action is complete, or may be issued for a specific number of days. Willful violators must be forwarded to DEQ with documentation.

**Monetary Penalty:** Monetary penalties will be assessed through the issuance of a Notice of Non-Compliance.

- Minimum Base Penalty
  - Illicit Discharge $250
  - Willful Discharge $500
- Cleanup Costs: If the violator cleans up the discharged pollutant there will be no charge for this. If the cleanup is done by RVSS the monetary penalty will include the actual cost incurred by RVSS to complete the cleanup.

Each day that a violation continues is considered a separate violation, except that the Cleanup Costs will only be assessed once. The maximum penalty is $2,000 per day per violation. The violations may be for a specific number of days or until the cleanup is completed.

**Procedure:** Complete the Notice of Non-Compliance form, have it reviewed by the District Engineer. Notice is signed by the Stormwater Coordinator. Prior to mailing the NONC, send an email to the city or county stormwater contact in whose area the project is located, notifying them that fine will be issued for a project in their area. The email should detail the project history, any previous brown tags and the reason for the fine.

Have the O&M Accounting Clerk prepare an invoice in the amount of the total penalty. Submit the notice and invoice to the RVSSS Construction Permit Applicant.

**Referral to DEQ:** Under RVSS' 2010-2015 IGA with DEQ, RVSS is required to refer to DEQ violations of the permit that meet the following criteria:

1. Repeat or chronic violators;
2. Willful violators;

3. Recalcitrant violators;
4. Violations where there is significant environmental harm (for example, where there is a large discharge to sensitive habitat); or
5. Situations where there was a large economic benefit resulting from non-compliance.

**Appeals Process:** If an Applicant wishes to appeal a fine, they may request a meeting with the District Engineer and Stormwater Program Coordinator to discuss the site history and reason for the fine.

**Record Keeping:** A copy of the notice will be filed in the project file and an electronic copy will be saved in the project file. Engineering Staff will maintain a database of Brown Tags, Stop Work Orders, Notice of Non-Compliance, and monetary penalties that are issued. This database is located at K:\DATA\Stormwater Post 2011\Construction Site SW Control\Enforcement Actions (add current fiscal year). Each month a summary of the enforcement actions will be provided to the District Engineer one week prior to the board of directors meeting.

**Table 3. Hotline Tracking for FY20.** Hotline calls are illicit discharges reported to RVSS by others.

| Date Reported | Reported by: | Location of Incident | Type of Incident | Initial Response Date | Date of OERS contact | Incident Response including dates of investigation. | OERS # |
|---|---|---|---|---|---|---|---|
| 8/29/2019 | Morgan, RVSS | Poppy Bay, Talent | 2 SS cross connections to SW | 8/29/2019 | 8/29/19 | IDDE sampling 8/27/19 identified paper product in ditch and excessive E. coli. Cross connections removed 9/3/19. storm system flushed 9/4/19. Follow-up E. coli testing done 9-9-19 by Morgan. | 2019-2267 |
| 9/3/2019 | Robert Corliss, Medford POTW | Willey Boats, White City | discharge of boat wash water | 9/3/2019 | | referred to City of Medford as not in RVSS MS4 | |
| 11/11/2019 | Robert Corliss, Medford POTW | Laundromat at 7561 Crater Lake Hwy, White City | report and photos of staining discharge from commercial building | 11/13/2019 | | Oyung followed up with property manager and business owner and it was determined that the discharge was from a water heater that is no longer draining to the exterior of building. Discharge now being collected and disposed of into sanitary sewer which Corliss says is ok. Since the discharge is a small amount and looks to have a substance (copper?) that should not go into stormwater. He communicated this info by phone to Oyung. | |
| 1/21/2020 | Cynthia Care, citizen | 532 Bell Street in Talent | auto detailing going on in the driveway, and the sudsy water goes into the gutter and down the storm drain on a daily basis | 1/23/2020 | | Oyung visited resident. Gave them notification letter. | |
| 1/31/2020 | Tim Hammond, RVSS | behind Rays, Talent | milk products in gutter. | 1/31/2020 | | Dan Hammond instructed them to clean up, they did by 1/31 afternoon. Confirmed by Oyung. Oyung sent letter on 2/12/2020. | |

## APPENDIX D: Section 3.4 Construction Site Runoff Control

Question 89. Checklist of Required Elements of ESCP Drawings
Question 90. RVSS SOP 9.06 Erosion and Sediment Control Inspection
Question 96. Electronic Inspection Report Form.

## PART III: CHECKLIST OF REQUIRED ELEMENTS OF ESCP DRAWINGS

### 1. Information Required on ESCP Drawings

| The following items must be depected on ESCP drawings, as applicable: | Yes | No | N/A* |
|---|---|---|---|
| a. Total property boundary including surface area of the development; (Sch. A.12.b.v.3.a) | | | |
| b. Areas of soil disturbance (including, but not limited to, showing cut and fill areas and pre- and post-development elevation contours); (Sch. A.12.b.v.3.b) | | | |
| c. Drainage patterns before and after finish grading; (Sch. A.12.b.v.3.c) | | | |
| d. Discharge points; (Sch. A.12.b.v.3.d) | | | |
| e. Areas used for the storage of soils or wastes; (Sch. A.12.b.v.3.e) | | | |
| f. Areas where vegetative practices are to be implemented; (Sch. A.12.b.v.3.f) | | | |
| g. All erosion and sediment control measures or structures; (Sch. A.12.b.v.3.g) | | | |
| h. Identify the type of seed mix (percentages of the various seeds of annuals, perennials and clover) and other plantings. (Sch. A.7.b.iii.3) | | | |
| i. Sediment fences, vegetative buffer strips, sediment traps, rock filters, compost berms/compost socks, fiber rolls/ loose non-compacted straw wattles, storm drain inlet protection, and temporary or permanent sedimentation basins (Sch. A.7.d.i) | | | |
| j. Diversion of uncontaminated flows around stockpiles, use of cover over stockpiles, and installation of sediment fences (or other barriers that will prevent the discharge of sediment or turbidity) around stockpiles. (Sch. A.7.e.ii.(3)) | | | |
| k. Stabilized site entrances and access roads including, but not limited to construction entrances, roadways and equipment parking areas (for example, using geotextile fabric underlay). (Sch. A.8.c.i.(4)) | | | |
| l. Perimeter sediment control, including storm drain inlet protection as well as all sediment basins, traps, and barriers. (Sch. A.8.c.i.(5)) | | | |
| m. Concrete truck and other concrete equipment washout areas. (Sch. A.8.c.i.(6)) | | | |
| n. Impervious structures after construction is completed (including buildings, roads, parking lots and outdoor storage areas); (Sch. A.12.b.v.3.h) | | | |
| o. Springs, wetlands and other surface waters on site or adjacent to the site; (Sch. A.12.b.v.3.i) | | | |
| p. Temporary and permanent stormwater conveyance systems; (Sch. A.12.b.v.3.j) | | | |
| q. Onsite water disposal locations (for example, for dewatering); (Sch. A.12.b.v.3.k) | | | |
| r. Storm drain catch basins depicting inlet protection, and a description of the type of catch basins used (for example, field inlet, curb inlet, grated drain and combination); (Sch. A.12.b.v.3.l) | | | |
| s. Septic drain fields; (Sch. A.12.b.v.3.m) | | | |
| t. Existing or proposed drywells or other UICs; (Sch. A.12.b.v.3.n) | | | |
| u. Drinking water wells on site or adjacent to the site (Sch. A.12.b.v.3.o) | | | |
| v. Planters; (Sch. A.12.b.v.3.p) | | | |
| w. Sediment and erosion controls including installation techniques; (Sch. A.12.b.v.3.q) | | | |
| x. Detention ponds, storm drain piping, inflow and outflow details (Sch. a.12.b.v.3.r) | | | |

# Standard Operating Procedures

| | |
|---|---|
| **Title:** | **9.06 Erosion and Sediment Control Inspection** |
| **Department:** | **Stormwater** |
| **Approved by:** | **Carl Tappert, Manager** |
| **Responsible Person:** | **Stormwater Program Manager** |
| **Participants:** | **RVSS Inspectors, Stormwater Program Manager** |

**General Description:** This procedure covers the inspection of NPDES 1200-C and 1200-CN Permitted projects, as well as projects covered by RVSS' 1200-CA permit.

1. Erosion and Sediment Control (ESC) plans are developed or approved by the Stormwater Manager.
2. RVSS' Inspector will conduct inspections and complete RVSS' Oversight Inspection Form using the ARCGIS Collector App. at the following times:
    a. Prior to the start of ANY construction[1], other than the installation of ESC Best Management Practices (BMPs), RVSS Inspector will meet with the designated Erosion and Sediment Control Inspector on-site to inspect installation of the BMPs.
    b. If possible, within 1 business day before a forecasted rain event of 0.5 inch or more. If it is not possible to conduct the inspection prior to 0.5 inch rain event, the inspection must be completed within 1 business day after a rain event of 0.5 inch.
    c. Within 1 business day after receiving a complaint about a construction site.
    d. During routine sewer inspections the RVSS inspector will take note of erosion and sediment control conditions. This is only time when an Oversight Inspection Form is not required to be completed.

3. The following areas will be inspected each time a form is completed:
    a. All areas of the site disturbed by construction activity to ensure that BMPs are in proper working order.
    b. Discharge point(s) identified in the ESCP for evidence of or the potential for the discharge of pollutants (including sediment and turbidity),
    c. Locations where vehicles enter or exit the site for evidence of off-site sediment tracking.
    d. Areas used for storage of materials that are exposed to precipitation for evidence of spillage or other potential to contaminate stormwater runoff.

4. Enforcement actions, including Brown Tags, Stop Work Orders and Monetary Penalties, should be issued in accordance with the SW Quality Enforcement SOP.

[1] Construction is defined in the 1200-C/CN permit as clearing, grading, excavation, materials or equipment staging and stockpiling.

RVSS Oversight Inspection of 1200-C and CN Permitted Sites

Project Name

SWQ Project No.

Inspection Date

Monday, September 28, 2020 12:30 ...

## Brown Tag

Did this inspection result in issuance of a Brown Tag? *

Yes No

## Inspector Information

Inspected By

username:dforbuss@rvss.us

Designated ESC

Contact Info

## General Contractor Information

Name

Contact Info

# RVSS Oversight Inspection of 1200-C and CN Permitted Sites

Name

Contact Info

## Weather

Temperature (F°)

Weather Condition

Clear | Cloudy | Light Drizzle | Raining | Storming | Other

Storm Event *

Yes | No

BMP Inspection Type *

Initial Inspect | Regular Inspection | Re-Inspection

Inspection Instigators:

- Inspect site after intallation
- Re-inspection of site if corrective action was previously required
- Inspect site after any storm event greater than 0.5 inches in a 24 hour period, or prior to a predicted event of 0.5" or more

## Item Description

Instructions:

**Check Yes, No, or NA if not Applicable. If any answer is No, describe needed maintenance and/or corrective actions in the space provided or on an attached sheet.**

Is stormwater discharge going offsite now, or is there evidence that SW runoff has occurred?

# RVSS Oversight Inspection of 1200-C and CN Permitted Sites

Instructions:

**Check Yes, No, or NA if not Applicable. If any answer is No, describe needed maintenance and/or corrective actions in the space provided or on an attached sheet.**

Is stormwater discharge going offsite now, or is there evidence that SW runoff has occurred?

Yes No N/A

Is there proper documentation?

Is a copy of the approved Site map, ESC plans and any revisions, and all visual monitoring records (completed copies of this Inspection report) available on site?

Yes No N/A

Were any changes made to the ESC Plans since the last Inspection?

Yes No N/A

Is the project being Phased per the approved ESC Plan?

Yes No N/A

Sediment controls in place?

Are all perimeter sediment controls in place, properly installed and well maintained where required by the ESC Plan?

Yes No N/A

Erosion prevention measures in place?

Are all erosion prevention measures in place, properly installed and well maintained where required by the ESC Plan?

Yes No N/A

Inlets, creeks, etc. properly protected?

Are all storm drain inlets, creeks, etc. properly protected and well maintained where required by the ESC Plan?

Yes No N/A

Entrances and exits protected?

Are construction site entrances and exits properly protected (e.g. using stabilized entrance, tire wash, street sweeping, etc.) to control off site tracking of sediment and construction related pollutants?

Yes No N/A

# RVSS Oversight Inspection of 1200-C and CN Permitted Sites

## Entrances and exits protected?

Are construction site entrances and exits properly protected (e.g. using stabilized entrance, tire wash, street sweeping, etc.) to control off site tracking of sediment and construction related pollutants?

- Yes
- No
- N/A

## Is construction site track-out evident?

- Yes
- No
- N/A

## Stockpiles covered and located properly?

Are all stockpiles covered, protected and/or located in an area where eroded material is unable to reach a storm drain or stream?

- Yes
- No
- N/A

## Storage, maintenance, and handling areas clean?

Are all material handling, equipment storage, maintenance areas and storage areas clean and free of spills, leaks, or other deleterious materials?

- Yes
- No
- N/A

## Are dust control and debris & waste control measures being appropriately implemented?

- Yes
- No
- N/A

## SW facilities fenced?

After initial site grading, have all stormwater facilities (ponds, swales, rain gardens, etc) been fenced off to prevent construction vehicles from entering and to prevent stockpiling of material and supplies in the area?

- Yes
- No
- N/A

## Natural buffer zones protected?

Are all natural buffer zones, and any trees to be protected on site, delineated and marked off with orange construction fencing (or equivalent) where required by the ESC Plan?

- Yes
- No
- N/A

## BMPs functioning properly?

Are all other BMPs identified in the ESCP (such as concrete washout containment structures, settling basins, dewatering pumps, other dewatering activities) functioning properly?

- Yes
- No
- N/A

BMPs functioning properly?

Are all other BMPs identified in the ESCP (such as concrete washout containment structures, settling basins, dewatering pumps, other dewatering activities) functioning properly?

- Yes
- No
- N/A

## Site Status

Site fully stabilized and all temporary BMPs removed? *

- Yes
- No

Notes:

1. Please refer to the ACWA Construction Site SW guide, or the 1200-C/CN permit or DEQ's manual for help completing this form.

2. Significant amounts of sediment are described in Schedule A as: earth slides or mud flows leaving the construction site; concentrated flows that cause erosion not filtered prior to discharge; turbid flows not filtered prior to discharge; sediment deposits that drain to unprotected or poorly maintained storm drains or catch basin; sediment deposits on public or private streets outside of permitted constriction area; and sediment deposits on any adjacent property outside of the permitted construction area.

## APPENDIX E: Section 3.6 Pollution Prevention and Good Housekeeping for Municipal Operations

Question 138. Jackson County IPM

Question 138. City of Talent IPM

Jackson County Roads

Guidelines for Pesticide Application

Permittee will, through continued use of an Integrated Vegetation Management plan, regularly review the amount and type of herbicides used, preferring herbicides that have better environmental profiles and low use rates where it is effective and economically practicable. All applications will be performed by licensed applicators in accordance with state law and manufacturer's recommendations. Reporting to the Oregon Department of Agriculture as required by state law will be performed.

Permittee will monitor herbicide usage and selection by applying the following guidelines:

1. Implement an Integrated Vegetation Management Plan that combines Cultural, Mechanical and Biological controls to reduce populations of pests and increase the efficacy of chemical control methods.
2. Use the smallest amount of herbicide (rate) necessary to get the job done.
    a. Permittee attempts to use the lowest rate of herbicide that will effectively kill the plant species being targeted. This saves on herbicide costs as well as reduces environmental impact. The actual rate used will vary according to the plant being targeted, stage of growth and environmental factors. For example, Spring annuals in the early growth stage can be killed with very low rates of herbicide. It can take 4 times as much herbicide to kill the same plant in the summer when it is heat stressed.
    b. Resistance: It is important to try to get as close to 100 percent control of a target species as possible to avoid resistance. If you lower the rate of an herbicide (i.e. % dilution) too close to the threshold that it takes to kill the target plant, you will leave some the target plants alive. These will tend to be the plants that have a slightly higher resistance to the herbicide. Over time, you will build a population that is resistant to the herbicide you are using and it will take more of the herbicide to kill the resistant population.
3. The application rates for different herbicides vary greatly. Permittee will use herbicides that have lower rates when they effectively treat all the target plants at an economically practicable cost.
4. Every herbicide has a signal word on the label to help indicate its toxicity to humans. The three signal words are "Danger", "Warning", and "Caution" in decreasing order of toxicity. Permittee will prefer herbicides that have a "Caution" signal word where they are effective and economically feasible.
5. The environmental fate of an herbicide is not on the label, but it can usually be found on "fact sheets" or information published by the manufacturer. Permittee will prefer herbicides that have lower half lives and are less likely to move through the soil profile when they effectively treat the target species and they are economically practical.

# CITY OF TALENT

# INTEGRATED PEST MANAGEMENT POLICY

# EFFECTIVE DECEMBER 5, 2018

## I. INTRODUCTION AND PURPOSE

Synthetic pesticides generally contain toxic substances that may have a detrimental effect on human health and, in particular, have adverse effects on the most vulnerable: infants, children, elders, and individuals who are taking medications or have suppressed immune systems.

Toxic substances in pesticides may also have a detrimental impact on the well-being of plants, animals and other living beings and entire ecosystems due to the pollution of air, water and soil.

The purpose of this Integrated Pest Management Policy (Policy) is to provide the City of Talent (City) a means of reducing the use of pesticides to protect the health, safety and well-being of our residents, pollinators and environment.

## II. SCOPE OF POLICY

This Policy shall apply to all City Departments, operations and impacts under the City's jurisdiction, and not to those of its residents. However, an important Policy goal is to encourage education and outreach to expand these IPM Policy principles to all City residents and properties.

## III. POLICY GOALS

- Reduce or eliminate the use of synthetic pesticides, to be phased out within three years of adoption of this Policy.
- Prioritize prevention and non-chemical control methods in park, facility and streetscape planning and design, manual maintenance and ecological controls, instead of the use of pesticides (other than organic low hazard pesticides) which shall be used only as a last resort.
- Safeguard the health, safety and welfare of people, pollinators, pets and the environment. Pollinators, being essential to the health of environments and agricultural interests, and who are particularly protected in Talent, which is a Bee City, should warrant special care.
- Educate Talent community members as to the health and environmental hazards of pesticides, and work towards phasing out the sale, provision, use and disposal of such pesticides.

## IV. DEFINITIONS

This list is not intended to be all-inclusive but to define terms most commonly used in the Integrated Pest Management process.

**Ecological Control** is the control of a pest by the introduction of a natural enemy or predator.

**Emergency** includes pest emergencies that cause a risk to human health or significant economic crop loss or that create an urgent need to eliminate or mitigate a pest situation that threatens the health or safety of members of the public or the structural integrity of facilities, or noxious weed mitigation that cannot be otherwise managed through this Policy. Section 18 of EPA. ORS 634.700(6)

**Integrated Pest Management** is a coordinated decision-making and action process that uses the most appropriate pest control methods and strategies in an environmentally and

economically sound manner to meet pest management objectives. The elements of integrated pest management include: (a) preventing pest problems; (b) monitoring for the presence of pests and pest damage; (c) managing the density of pest populations, which may be set at zero, that can be tolerated or corrected with a damage level sufficient to warrant treatment of the problem based on health, public safety, economic or aesthetic thresholds; (d) treating pest problems to reduce populations below those levels established by damage thresholds using strategies that may include biological, cultural, mechanical and pesticidal control methods and that shall consider human health, ecological impact, feasibility and cost effectiveness; and (e) evaluating the effects and efficacy of pest treatments." Prevention is the prioritized strategy for an IPM program. Oregon Statute (ORS 262.1), Chapter 943.

**IPM Coordinator** – Public Works Director or his or her designee who is tasked with implementing this Policy into an Integrated Pest Management program. The IPM Coordinator will assist with and assure that the IPM program functions smoothly and interact directly at the department level in pest prevention or control. The IPM Coordinator will also plan and coordinate with the IPM Subcommittee to schedule and/or conduct training sessions for departments and greater community as needed.

**Organic pesticides** are products that have not been modified in any way from their original composition. The most common are plant oils. Many types of plants produce an odorous oil that can be used as both a deterrent for insects as well as a "contact kill." Organic pesticides have not been changed or modified in any way, although they are many times diluted in water.
Examples may include but are not limited to: types of mint, diatomaceous earth, or boric acid.

**ORS** refers to the Oregon Revised Statutes.

**Pests** are organisms located where they are not wanted, and/or which may cause health, economic, aesthetic, or ecological damage. In this context, "weed" is a social, economic, and legal term, not a biological one.

**Pesticides** are defined as "any product to kill or control or mitigate a pest." Pesticides include "insecticides" for use against insects, "herbicides" for use against weeds, "fungicides" for use against fungi or fungal spores, and "rodenticides" which kill rats and mice, etc.. Such products must be registered by the appropriate agency, be properly labeled and appropriately used.

**Restricted pesticides** Any products or synthetic pesticides that:
(a) Contain a pesticide product or active ingredient that has the signal words "warning" or "danger" on the label; (b) Contain a pesticide product classified as a human carcinogen or probable human carcinogen under the United States Environmental Protection Agency 1986 Guidelines for Carcinogen Risk Assessment; or (c) Contain a pesticide product classified as carcinogenic to humans or likely to be carcinogenic to humans under the United States Environmental Protection Agency Guidelines for Carcinogen Risk Assessment. ORS 634.705(5).

**Synthetic pesticide** is any product that has been modified by humans for the use of killing or repelling pests. The active ingredients are generally produced synthetically, e.g., are synthetic chemicals that prevent, mitigate, destroy, or repel any pest; or that act as a plant growth regulator, desiccant, defoliant or nitrogen stabilizer. There are many classes of synthetic pesticides. The main classes consist of organochlorines, organophosphates, carbamates, neonicotinoids, and pyrethroids. (EPA definition).

## V. USE OF PESTICIDES BY CITY AND NON-CITY PERSONNEL

All City Department and public and private entities and contractors (including subcontractors and volunteers) performing any work on City properties or within the portions of the Bear Creek Greenway under the City's jurisdiction, shall be bound by this Policy and shall coordinate with Public Works, or the IPM Coordinator as separately designated, prior to any pesticide application to ensure Policy compliance.

All new Intergovernmental and Joint Powers Agreements, contracts and franchise and other agreements for any work on City properties or within the portions of the Bear Creek Greenway under the City's jurisdiction, must be consistent with this Policy.

City staff and contractors shall provide documentation (to include date and time, location, synthetic pesticide type and quantity) of substances used, and the City shall maintain such documentation to be available for public review.

## VI. PUBLIC WORKS AND IPM SUBCOMMITTEE

The IPM Coordinator is charged with developing specific practices, (taking into account the Management Options listed in Paragraph VIII, below) a list of approved safer alternatives and methods, forms, signage and procedures for alternatives, application, safe handling and public warning/interaction that may be updated periodically without the need to modify this IPM Policy. The IPM Coordinator shall take the lead to work with and convene regular meetings with the Parks & Recreation Commission ("Parks Commission") and the IPM Subcommittee, to include a Parks Commission representative, a Together for Talent Committee representative, and a City Council Liaison, to assist with this process.

In practice, integrated pest management is continually evolving. The IPM Subcommittee shall hold quarterly meetings, to evaluate Policy implementation, report on all synthetic pesticide applications, share any pest-related concerns, new technologies and best practices, program-related information, or individual experiences with the general public/staff and to coordinate public outreach and education efforts in order to uphold the goals of this Policy. The IPM Subcommittee shall report to the Parks Commission during an open meeting at least annually.

Pesticide risks will be minimized by careful product selection and application, with emphasis on natural or organic remedies. When developing and updating the IPM program, City staff will rely on materials and methods, including science-based information, state university departments, university extension scientists, and other experts with emphasis on least toxic remedies.

## VII. DECISION MAKING, EVALUATION

The IPM Coordinator is tasked with creating a program that uses the most appropriate pest control methods and strategies in an environmentally and economically sound manner to meet the pest management objectives in alignment with the goals in this Policy.

These program decisions include:

- Preventing pest problems;
- Monitoring for the presence of pests and pest damage;

- Managing the density of pest populations that can be tolerated or corrected with a damage level sufficient to warrant treatment of the problem based on health, public safety, economic or aesthetic thresholds; and

- Treating pest problems to reduce populations below those levels established by damage thresholds using strategies that may include biological, cultural, mechanical and organic pesticide control methods and that shall consider human health, ecological impact, feasibility and cost effectiveness.

The IPM Subcommittee shall develop evaluation criteria to determine the effects and efficacy of the pest treatment strategies and shall evaluate the program on a quarterly basis.

## VIII. MANAGEMENT OPTIONS

This Policy prioritizes prevention and non-chemical control measures by following a systematic approach that uses extensive knowledge about pests and their hosts, such as infestation thresholds, life cycles, and environmental requirements to compliment and facilitate biological and other natural control of pests.

Management Options shall include:

- Appropriate prevention strategies;

- Monitoring protocols with associated tolerance/action thresholds;

- Tiered application of control measures moving from non-chemical methods, to organic pesticides and to restricted pesticides only in emergencies; and

- Specific use requirements and restrictions for each control method and product.

All pesticides available for use within City grounds must first be placed upon an IPM-Subcommittee approved list after undergoing an IPM Subcommittee review process that carefully examines the characteristics of the individual product and whether it would be an appropriate addition within this Policy. Issues of efficacy, public health and safety, potential environmental impacts, overall plant health requirements, land management needs, and other concerns are considered during this process. Applicators must then make their choices of materials from the approved list.

**Principle:** Utilize non-chemical management options first, and only use chemicals as a last resort.

**Goal:** To implement a phased in approach that will reduce and eventually eliminate the use of synthetic pesticides in parks and other City properties.

The expectation is that volunteers will be engaged to participate whenever possible.

Synthetic chemical pesticide applications are used only after other IPM strategies have first been either employed or considered. The majority of pest management practices should ideally never involve the use of synthetic pesticides, with particular care given to sensitive areas such as playgrounds, waterways, dog parks and riparian areas.

## Management options include:

**Landscapes and grassy areas:**

- Lawn / grassy areas
  - Mow, and mulch in grass clippings
  - Treat areas to amend soil and biology such as with a diluted molasses solution
  - Fertilize with organic fertilizer
  - Check that irrigation amount is appropriate

- Landscaped areas / beds
  - Mulch with woodchips, bark, other appropriate materials
  - Weed whack borders and edges where possible
  - Treat established plants with mycorrhizae
  - Fertilize with organic fertilizer
  - Check that irrigation amount Is appropriate
  - Steam weed as available
- Right of ways
  - Weed whack or steam weed where possible

**Insect pests:**

- Identify the pest and its life cycle – when is it a problem?
- Determine if the pest can be excluded or trapped
- Utilize an organic insecticide as the first chemical option
- Deploy ecological controls such as beneficial insects

**Mammal Pests:**

- Identify the pest and its life cycle - what does it eat?
- Determine if the pest can be excluded or trapped
- Utilize a physical trap as first option

## IX. ENDANGERED HABITAT, NON-TARGET AND SENSITIVE SPECIES

In the interest of preserving food, pollen, and nectar sources for endangered or threatened species, measures should be maintained to prevent widespread destruction of those sources. Some maintenance, landscaping, mowing, weeding and extensive use of toxic pesticides currently represent further degradation of vital or endangered species and therefore should be minimized or eliminated.

Measures should be taken to preserve endangered habitat and/or work around them where possible or practical, especially in playgrounds, waterways, dog parks and riparian areas, except where required in those rare City parks and public spaces that are maintained for aesthetic reasons, such as frequently managed turf areas, tree wells, ornamental plant beds and edges.

## X. USE OF PESTICIDES – EMERGENCY CIRCUMSTANCES AND WAIVERS

True emergencies must first be correctly identified pursuant to the definition herein.

The City recognizes that circumstances may arise in which cultural, biological, and physical IPM practices may not be practical. If a situation is determined by the IPM Coordinator to be urgent/non-routine and requiring the use of a synthetic pesticide to achieve satisfactory levels of control, then the following steps shall be followed:

Before applying a restricted pesticide, IPM Coordinator must request a waiver and receive approval of the City Manager or his or her designee, prior to any such application. When applying a waiver, the applicant shall provide substantial proof that they have exhausted all reasonable alternatives to the use of restricted pesticides. In deciding waiver requests, the City Manager shall balance the true emergency or need for the use of restricted pesticides against the express goals of this IPM Policy. Restricted pesticide shall only be applied after a waiver is granted by the City. All applications, waiver determinations and documentation shall be provided to the IPM Subcommittee on a quarterly basis.

The use of occasional wasp or hornet sprays by employees or contractors who may otherwise be at risk of insect stings shall not be covered by this section, except that reports of such use shall be made to the IPM Coordinator, and persons who may be affected shall be given advance notice if time permits.

It is critical that pesticide actions undertaken with the guidance of this Policy should take great care to limit such actions in consideration of vital species such as common pollinators and non-target (not intended) species. Pollinators, being essential to the health of environments and agricultural interests, should warrant special care and be encouraged and invited into our community. Some pollinators should receive great care to be moved or otherwise discouraged if they become public threats. Such threats should also be clearly defined, as in the case of bees, by the *City of Talent Policy on Bee Swarms/Extractions.*

## XI. EDUCATION AND OUTREACH

The IPM Subcommittee shall develop a plan for education and outreach into the greater community. This plan may include:

- Signage in parks to indicate management strategies being implemented;
- Community workshops, classes, and events to educate the public, staff, and professionals about reducing pesticide use and provide information from content experts about how to implement an organic IPM program; and
- Resources provided to interested citizens who want to learn more about the Talent IPM program or how they can implement their own.

## XII. REVIEW AND MODIFICATION

The IPM Subcommittee may propose changes to this Policy periodically for Parks Commission review prior to that Commission recommending changes to Council.

## Appendix F: Section 4.0 Monitoring

### Question 144. Table 4. RVSS Outfall Monitoring Data

**Table 4. Outfall Data from Dry Season Monitoring FY20**

| Date Collected | Time Collected | Stream | Sample ID | Sample Type | Water Temp. (C) | Conductivity (uS) | pH | TDS (ppm) | E. coli MPN/100 mL | E. coli Geometric mean (MPN/100 ml) |
|---|---|---|---|---|---|---|---|---|---|---|
| 7/17/2019 | | Bear Creek | BE06 outfall | outfall grab | 20.4 | 430 | 7.61 | 305 | 2 | 1.41 |
| 7/17/2019 | | Bear Creek | BE06 outfall | DUP | | | | | 1 | |
| 8/7/2019 | | Bear Creek | BE12 outfall | outfall grab | | | | | 43.5 | 45.69 |
| 8/7/2019 | | Bear Creek | BE12 outfall | DUP | | | | | 48.0 | |
| 8/7/2019 | 10:57 | Bear Creek | BE11 from Medfor | outfall grab | 20.7 | 473 | 7 | 333 | 193.5 | 182.54 |
| 8/7/2019 | | Bear Creek | BE11 from Medfor | DUP | | | | | 172.2 | |
| 8/7/2019 | | Lab Blank | Lab Blank | QA/QC | | | | | <1 | |
| | | | | | | | | | | |
| 8/14/2019 | 11:33 | Bear Creek | BE03 Gebhard Rd ( | outfall grab | 16.5 | 457 | 7.31 | | 83.7 | 71.16 |
| 8/14/2019 | | Bear Creek | BE03 Gebhard Rd ( | DUP | | | | | 60.5 | |
| 8/14/2019 | | Bear Creek | BE14 outfall | outfall grab | | | | | 1.0 | 1.00 |
| 8/14/2019 | | Bear Creek | BE14 outfall | DUP | | | | | <1 | |
| 8/14/2019 | | Bear Creek | BE16 outfall from ( | outfall grab | 18 | 550 | 7.01 | 391 | 12.1 | 13.91 |
| 8/14/2019 | | Bear Creek | BE16 outfall from ( | DUP | | | | | 16.0 | |
| 8/14/2019 | | Lab Blank | Lab Blank | QA/QC | | | | | <1 | |
| | | | | | | | | | | |
| 8/28/2019 | | Bear Creek | BE23 outfall | outfall grab | | | | | >2419.5 | >2419.5 |
| 8/28/2019 | | Bear Creek | BE23 outfall | DUP | | | | | >2419.5 | |
| 8/28/2019 | 10:00 | Bear Creek | TID | outfall grab | 19.6 | 396.5 | 7.76 | 281 | 209.8 | 320.10 |
| 8/28/2019 | | Bear Creek | TID | DUP | | | | | 488.4 | |
| 8/28/2019 | | Lab Blank | Lab Blank | QA/QC | | | | | <1 | |
| | | | | | | | | | | |
| 9/4/2019 | 10:55 | Bear Creek | BE47 outfall | outfall grab | | | | | <1 | |
| 9/4/2019 | | Bear Creek | BE47 outfall | DUP | | | | | 1.0 | |
| 9/4/2019 | 11:25 | Bear Creek | BE49 outfall | outfall grab | | | | | 131.4 | 180.85 |
| 9/4/2019 | | Bear Creek | BE49 outfall | DUP | | | | | 248.9 | |
| 9/4/2019 | 12:05 | Bear Creek | BE50 outfall | outfall grab | | | | | 73.3 | 85.19 |
| 9/4/2019 | | Bear Creek | BE50 outfall | DUP | | | | | 99.0 | |

| Date Collected | Time Collected | Stream | Sample ID | Sample Type | Water Temp. (C) | Conductivity (uS) | pH | TDS (ppm) | E. coli MPN/100 mL | E. coli Geometric mean (MPN/100 ml) |
|---|---|---|---|---|---|---|---|---|---|---|
| 9/4/2019 | 12:20 | Bear Creek | BE51 outfall | outfall grab | 17.8 | 494 | 6.71 | 351 | 17.1 | 15.14 |
| 9/4/2019 | | Bear Creek | BE51 outfall | DUP | | | | | 13.4 | |
| 9/4/2019 | | Lab Blank | Lab Blank | QA/QC | | | | | <1 | |
| | | | | | | | | | | |
| 9/9/2019 | | Bear Creek | BE22 outfall | outfall grab | | | | | 113.0 | 137.12 |
| 9/9/2019 | | Bear Creek | BE22 outfall | DUP | | | | | 166.4 | |
| | | | | | | | | | | |
| 9/25/2019 | | Bear Creek | BE35: OF Kamerin | outfall grab | | | | | 46.5 | 47.24 |
| 9/25/2019 | | Bear Creek | BE35: OF Kamerin | DUP | | | | | 48.0 | |
| 9/25/2019 | | Bear Creek | BE26: OF @ Bramn | outfall grab | 19.8 | 958 | | | 146.7 | 124.35 |
| 9/25/2019 | | Bear Creek | BE26: OF @ Bramn | DUP | | | | | 105.4 | |
| 9/25/2019 | | Lab Blank | Lab Blank | QA/QC | | | | | 0.0 | |