

2021-2024

Stormwater Management Plan

Adopted : March 11, 2021
This plan, and approved
modifications, will be in force
until the end of the current
permit term dated: February 29,
2024



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Background

The City of Turner initially developed a stormwater management plan in 2004 and that plan was adopted by the Department of Environmental Quality (DEQ) as part of the 2006 permit cycle for NPDES MS4 Phase II permit holders. That permit, and the adopted supporting documents, were then administratively extended when the permit cycle was extended. Due to both the permit extension and the ongoing litigation between the City of Turner and DEQ, the City was not pursuing an update to its plan, as the required content was very uncertain. In December 2019, DEQ issued a warning letter to the City stating Turner was not in compliance with all the terms and conditions of its permit. An update to the SWMP was required in this warning letter.

Modified MS4 Permit

The City of Turner and DEQ reached a settlement agreement regarding the MS4 permit originally issued by DEQ in December 2019. That settlement agreement created the issuance of a modified MS4 permit that would cover the City for the remainder of the original permit term. This permit will become effective for the City sometime in 2021. This effective date will be subsequent to the submittal and proposed approval of this SWMP plan.

Because of this, the construction of the SWMP takes into account a change in required BMPs and attempts to cover the additional regulatory requirements imposed upon the City by this modified permit. BMPs that are specifically required in the new modified permit will be noted with a (MP).

MS4 System

The City of Turner owns and operates a municipal stormwater system. That system has approximately 12 outfalls; 290 catch basins; 4.1 miles of pipe; 1.3miles of defined ditches; 2 dry wells. Since the City is a very old community, founded in 1905, much of the layout, sizing and structure is quite old.

The City of Turner permit outfalls enter two water bodies of the state:

- Mill Creek
- Turner Lake

Turner Vital Statistics

Area	Acres	Properties
Residential Water	950	1,165
Commercial	5	45
Industrial	10	3

At this overview level, it is critical to note that the major roadways in Turner are not under the City's direct jurisdiction and the City does not exercise policy nor operational or maintenance control over these

streets. The vast majority of Turner Road, Marion Road and Delaney Road are under the road authority of Marion County Public Works. Therefore, the stormwater activities that occur within the confines of this jurisdictional delineation are solely the responsibility of Marion County and not the City of Turner. As is appropriate under the permit, if the City sees any pollution concerns, we will report those to Marion County, but we are not in charge of these systems, even though these systems also discharge into City stormwater pipes and outfalls that discharge to water bodies of the State.

As a part of the City's efforts to manage negative impacts of stormwater, although managed equally through the City's TMDL, is the general condition of the riparian corridor throughout the City limits. This corridor, originally studied in the early 2000s and re-examined with the passage of the City's original riparian protection code in 2009, is of extremely high quality. The City is fortunate that a number of large stream side parcels are owned by nonprofits and public entities, including the City of Turner, providing less development urge and more community protective value.

General Water Quality Context

The City of Turner sits approximately 7 miles upstream of Salem within the Mill Creek watershed. It therefore has a very urbanized downstream that it discharges to. Equally there is a very rural upstream which discharges into the City's boundary. Since this rural area has been heavily denuded of forested land and is actively farmed over large portions of the upstream basin area, there is substantial soil disturbance occurring on a regular basis. This creates a general discoloration of the water which can be seen at almost all times of the year. More significant, however, is that during rain events which can occur at any time from mid-October through May, the multi-channel Mill Creek system is full of eroded sediment. And since all its branches join just upstream of/within the city limits of Turner, all this sediment load passes into and through the City's MS4 discharge system.

Because water quality is so severely impaired by a lack of regulatory controls in the upstream reaches of Mill Creek, it makes it virtually impossible to look at the stream to gauge water quality from any activity within the City. The average citizen therefore cannot "see" when erosive discharge enters the stream from City activity. In addition, when Creek levels have risen in the early fall, many of the discharge pipes are completely submerged, making it impossible for anybody to see unusual discharges.

Additional Permit Compliance, Monitoring and Reporting Requirements

This section of the SWMP is meant to provide a high-level management context for program development to ensure that all-aspects of the City's permit, not only the six-minimum control measures (Schedule A; Item 4) are complied with. This includes all program requirements listed in the modified MS4 permit. To be sure of correct compliance procedures, staff must refer to the specific permit language.

- a. **Coverage:** the MS4 permit specifically covers discharges coming into and out of the publicly owned stormwater system.
- b. **Water quality standards:** compliance with the requirements contained in the permit is deemed compliance with applicable water quality standards. The City is required to investigate, and report

site-specific concerns based on the existence of credible evidence which may exceed water quality standards. Reporting details are listed in Schedule A section 1B (MP).

- c. **Discharge or authorization:** the permit itself is an official granting, by DEQ, that discharges are authorized. Authorized non-stormwater discharges are specifically listed under Section A (d), Page 9 (MP).
- d. **Electronic system use:** The City must submit all required documents using DEQs electronic reporting system when directed to do so as listed on page 7 (MP).
- e. **SWMP document:** The City must maintain a stormwater management program which describes in detail the activities which will be implemented to ensure the City meets minimum permit requirements. This document must be reviewed annually, and if determined, must be updated annually.
- f. **Administration:** The City must maintain sufficient administrative procedures to gather and track data in order to meet permit compliance. It is reasonable for the City to use the MEP standard in evaluating these procedures and systems.
- g. **Annual report:** no later than November 1 of each calendar year the City must supply an annual report to DEQ summarizing its implementation activities required by the permit for the previous fiscal year period. This report must be available to the public on a website as listed in Schedule B, page 31 (MP).
- h. **Monitoring requirements:** if the City engages in stormwater monitoring and/or sampling and measurements of stormwater effluent, the results of such work must be provided to DEQ and reported in the annual report.
- i. **Record retention and availability:** all permit related documents must be retained for a minimum of three years (Schedule F Section C.8). Such documents relative to the permit are available to DEQ upon request.
- j. **Definitions:** in ensuring proper implementation of the specific language in the modified permit, the following definitions need to be continuously available and understood:
 - a. **Impervious surface:** any surface resulting from development activities that prevents the infiltration of water. Common impervious surfaces include building roofs, traditional concrete or asphalt paving on walkways, driveways, parking lots, gravel lots and roads, and heavily compacted earth and materials.
 - b. **Maintenance activities, as used in the definition of redevelopment,** means activities such as pavement preservation projects, restoration of impervious surfaces disturbed by construction, maintenance or repair of utilities, and roof replacement projects.
 - c. **Redevelopment:** means a project that entails construction activities, occurs on a previously developed site and results in the addition or replacement of impervious surface. To the extent allowable under federal law, redevelopment does not include: maintenance activities; construction activities conducted to ameliorate a public health or safety emergency or natural disaster; and/or construction activities within an existing footprint to repair or replace a site or a structure damaged by a public health or safety emergency or natural disaster.
 - d. **Acronyms:** the following acronyms are explained for clarification purposes:
 - DEQ: Department of environmental quality
 - TMDL: total maximum daily load
 - MEP: maximum extent practicable

- BMP: best management practice
 - MP: modified permit
- k. **Penalties:** under ORS 468.140 DEQ is allowed to impose civil penalties up to \$25,000 (Sch. F Section A.2) per day per violation of the terms, conditions, or requirements of a permit. Additional fines, penalties and criminal actions can be imposed under other state laws.
- l. **Facility operation and maintenance:** the proper operation and maintenance of all stormwater facilities and systems of treatment and control are a compliance requirement of the permit.
- m. **Emergency Response and Public Notification Plan:** the permit holder must develop and implement an emergency response and public notification plan that identifies measures to protect public health from potential bypasses or upsets that may endanger public health. Schedule F, B7, page 44.

Specific Compliance Thresholds

The permit under which the city is currently operating and modified permit to be issued later in 2021 differ in specific threshold requirements for minimum measures under two specific programs. The table below is meant to provide basic guidance and awareness of these differences. Further detail, and specifics of how these differences affect the program, are worked out within the specific protocols and standards required as BMPs are implement.

APPLICABLE PERMIT	MINIMUM MEASURE D. CONSTRUCTION EROSION CONTROL PLAN REVIEW	MINIMUM MEASURE D. CONSTRUCTION EROSION CONTROL SITE INSPECTION	MINIMUM MEASURE E POST CONSTRUCTION SITE RUNOFF
ADMINISTRATIVELY EXTENDED PERMIT FROM 2006	If project site is over 1 acre, Or the common development plan is over 1 acre	If project site is over 1 acre, Or the common development plan is over 1 acre	If project site is over 1 acre, Or the common development plan is over 1 acre
MODIFIED PERMIT ISSUED IN 2021	If Land disturbance is greater than 10,890 ft. ² Or the project plan is greater than 1 acre	If project site is over 1 acre, Or the common development plan is over 1 acre	If more than 5000 ft. ² of impervious surface is created or replaced Or the project plan is greater than 1 acre

Overall Program Status and SWMP Adaptation

Over the past 13 years of permit work, the City had successfully developed, and then continued to implement several programs associated with the six minimum control measures. In this management plan update, the City will summarize the successful program status that they will continue to implement and monitor for minimum measures that have been completely developed. Practices that are either new, or do not fall under an easy collectively stated management goal, will be listed separately, and tracked and evaluated as such.

Review and Revisions

A review of the SWMP document must be completed annually under Schedule A.6. Upon the review, staff will record the date, responsible party and reference the review documentation in the table below. Each annual review shall become an official appendix to this plan until completion of the permit cycle.

Date	Responsible Party	Documents
November 2021		
November 2022		
November 2023		
November 2024		
November 2025		

Minimum Control Measure 1: Education & Outreach

Goal

- 1.) Inform the public, businesses, construction operators and other stakeholders about the impacts of stormwater pollution on our waterways.
- 2.) Provide these audiences with steps and/or actions that will reduce pollutants in stormwater runoff.
- 3.) Understand which local behaviors and practices cause and contribute to stormwater pollution and work to reduce selected behaviors.

The program will provide education and outreach using methods that are appropriate for the desired audiences. Some of these methods may include social media messaging, brochures, or handouts, in-person event outreach or presentations and trainings.

BMPs

EO-1: Identify 3 topics that impact water quality locally. These topics will be considered priority topics to be addressed during outreach campaigns over the course of the permit term. Topics could include:

- a. Impacts of illicit discharges and how to avoid and report them
- b. Impacts from impervious surfaces and to avoid them
- c. Practices for proper use and storage of pesticides, herbicides, and fertilizers
- d. Practices to reduce litter
- e. Practices for recycling programs
- f. Practices for power washing, carpet cleaning, auto repair and maintenance
- g. Low impact development and green infrastructure
- h. Potential impacts of septic systems and practices for maintenance
- i. Watershed awareness
- j. Storm drain awareness and connectivity to local rivers and streams
- k. Other stormwater issues of significance

EO-2a: Offer at least one educational message or activity from the priority list to the general public, homeowners, students, or businesses over the permit term.

EO-2b: Offer at least one educational message or activity from the priority list to local elected officials over the permit term.

EO-2c: Offer at least one educational messages or activity to construction site operators over the permit term that addresses any of the following topics:

- a. Appropriate selection, design, installation and use of onsite stormwater controls as outlined by City of Turner ordinance.
- b. Appropriate maintenance of onsite stormwater controls as outlined by City of Turner ordinance.

EO-3: Implement one assessment or evaluation on an education and outreach activity to determine how effective the activity was at conveying the material to the intended audience.

Measurable Goals

BMP	Milestones	Finish	Deliverables
EO-1	<ul style="list-style-type: none"> • Identify 3 priority topics 	July 2021	<ul style="list-style-type: none"> • Priority list of topics
EO-2a-c	<ul style="list-style-type: none"> • Develop annual plan • Offer 1 message annually 	Annually, the starting June 2021	<ul style="list-style-type: none"> • EO Annual Plan • Priority topic covered, method, audience type, estimated reach
EO-3	<ul style="list-style-type: none"> • Determine type of assessment & activity to assess • Implement assessment • Implement findings in following year 	Feb 2024	<ul style="list-style-type: none"> • Assessment metric, summary of how the activity was considered successful

Responsible Person(s):

Most outreach activities are designed and implemented by the Development Services Clerk who is supervised by the City Administrator. Some outreach activities may involve other groups like Public Works or other entities but will be coordinated through the Development Services Clerk. All activities are approved and overseen by the City Administrator.

Rationale

EO-1: The City currently utilizes social media to share around 10 educational messages annually. However, it is challenging to measure the impact of those messages. To help promote behavior change, staff will develop a list of 3 behaviors that negatively impact water quality locally. Staff will concentrate on creating in-depth messages and activities that target those behaviors

throughout the permit term. Focusing in-depth on a small number of topics will promote lasting behavior change.

EO-2: By distributing at least one educational message or activity a year, the City will be fulfilling the general permit requirements. Additionally, by focusing messages on the City identified priority topics, the messaging will be more impactful.

EO-2a: The City currently focuses heavily on distributing most of their educational messages to the public through the use of social media. Going along with EO-1, during this permit term, staff should identify priority topics to promote through social media. Staff should also coordinate social media messaging with other activities in an effort to have a greater impact.

EO-2b: Elected officials have the ultimate policy choice over program development and implementation. The City will reach out to the City Officials at both the City Council level as well as the Budget Committee level during annual budget development. Both of these venues will provide an ongoing opportunity to inform policymakers of program development, potential concerns and needed program adaptations.

EO-2c: The City has found by experience that direct communication is the biggest way of providing information to our contractors. Providing specific educational information and event opportunities to the building community is therefore the most positive nexus between permit requirements and actual performance. The City maintains a list of development contacts through its permit program and will use this as an ongoing database for outreach initiatives. In addition, because the developers are the people that we are trying to guide on the ground, through plan review and inspections, we can best tailor needed behavior change to this user group.

EO-3: As staff develop the annual education and outreach plan, it should also include plan to evaluate the effectiveness of at least one activity.

Minimum Control Measure 2: Public Involvement/Participation

Goal

- 1.) Provide adequate opportunity for the public to participate in the development of the SWMP control measures and programs.

The program will utilize a variety of methods to make the public aware of opportunities to participate in the development of implementation plans. It will also encourage participation from diverse groups within the community.

BMPs

PI-1: Maintain and promote a publicly accessible website that includes the following information:

- a. SWMP
- b. Contact information
- c. Educational materials
- d. Illicit discharge reporting procedures
- e. Complaint/Reporting forms
- f. Annual report (MP)

PI-2: Utilize HOA groups to promote participation in stormwater programs.

PI-3: Create an annual stewardship opportunity for the public. These could include:

- a. Stream team activities
- b. Storm drain marking
- c. Volunteer monitoring
- d. Riparian plantings
- e. Wetland enhancement
- f. Neighborhood low-impact development
- g. Adopt-a-road

- h. Stormwater facility monitoring and maintenance
- i. Citizen advisory committee
- j. Other locally relevant opportunities

PI-4: Use one Stakeholder’s Group luncheon annually for public leadership involvement with any program changes.

Measurable Goals

BMP	Milestones	Finish	Deliverables
PI-1	<ul style="list-style-type: none"> • Conduct an annual revision and update of website 	June 2021	<ul style="list-style-type: none"> • Number of site visits to each page • Date of revision & update
PI-2	<ul style="list-style-type: none"> • Provide opportunities for input 	June 2022	<ul style="list-style-type: none"> • Meeting dates, agendas, number of attendees
PI-3	<ul style="list-style-type: none"> • Develop stewardship opportunity • Implement activity 	June 2023	<ul style="list-style-type: none"> • Summary of event, event date, number of participants
PI-4	<ul style="list-style-type: none"> • Program Presentation at Stakeholder’s Luncheon 	June 2021	<ul style="list-style-type: none"> • Meeting agenda and minutes

Responsible Person(s)

The majority of public involvement activities are designed and implemented by the Development Services Clerk who is supervised by the City Administrator. All Development Services Clerk activities are approved and overseen by the City Administrator.

Rationale

PI-1: The City operates a publicly accessible website that meets ADA accessibility standards and has upgraded its content during the 2019 warning letter satisfaction process. As more educational materials are developed by the City, it will be posted to the website. In addition, with our recent upgrade we can include a new and more effective complaint/concern reporting process.

PI-2: The City has no additional volunteer appointed boards that supplement the City Council. Therefore, we intend to use homeowner associations, whose memberships include approximately 35% of the entire City, both of whom discharge stormwater as private entities to a City owned lake, as a primary source for involvement in the stormwater program development.

PI-3: Historically the City has done catch basin stenciling as a stewardship program. However, with the advent of the new city owned 70-acre lake, to which seven different stormwater outfalls discharge, this high water quality body, which the City wants to maintain as such, will be used as

the focal point for ongoing stewardship development. Activities at the lake, because they will generate solid public exposure in support, will be helpful in program education.

PI-4: Stakeholder presentation provides broad and high-level leadership involvement with a program which effects the public and business members.

Minimum Control Measure 3: Illicit Discharge Detection and Elimination

Goal

- 1.) Implement and enforce a program that detects and eliminates illicit discharges into the MS4.

The program will prohibit non-stormwater discharges into the MS4 through the enforcement of an ordinance or other regulatory method.

This is a program that the City has already fully developed. The City has already produced mapping products and has an ordinance in place to enforce discharge issues (Ordinance No.13-104).

BMPs

IDDE-1: Implement and monitor existing IDDE program, including reporting, detection, enforcement, and elimination of discharge concerns that impact water quality.

IDDE-2: Update stormwater system map based on new development showing inventory of system components, as well as jurisdictional responsibilities, both public and private.

IDDE-3: Provide annual outreach informing system users of the public hazards associated with illegal discharge.

IDDE-4: Develop a discharge response protocol to address reported or detected discharges.

IDDE-5: Provide annual training in illicit discharge program oversight and implementation in conjunction with City of Salem’s Environmental Services Division.

Measurable Goals

BMP	Milestones	Finish	Deliverables
IDDE-1	<ul style="list-style-type: none"> Implement and monitor existing program 	June 2022	<ul style="list-style-type: none"> Annual report due November 1
IDDE-2	<ul style="list-style-type: none"> Update stormwater map 	June 2022	<ul style="list-style-type: none"> Updated map

IDDE-3	<ul style="list-style-type: none"> • Provide annual outreach 	June 2022	<ul style="list-style-type: none"> • Annual training documents
IDDE-4	<ul style="list-style-type: none"> • Develop response protocol 	June 2023	<ul style="list-style-type: none"> • Response documents
IDDE-5	<ul style="list-style-type: none"> • Provide annual training 	Annually starting June 2022	<ul style="list-style-type: none"> • Documentation of participants

Responsible Person(s)

The IDDE program will require a division of responsibilities and therefore coordination between the Public Works Department and the Development Services Clerk. On the ground data collection and discharge investigation will be the responsibility of the Public Works Director or his delegate. Collection and processing of that data and ensuring appropriate enforcement action will be the responsibility of the Development Services Clerk. In case of a required enforcement action, the issue and conditions will be brought to the City Administrator and they will decide appropriate action. Finally, the City will also need to coordinate with the City of Salem’s Environmental Services Division to continue to ensure proper response on needed discharge investigations and to provide guidance and opportunities for training and outreach.

Rationale

IDDE-1: Over the entire term of the permit, the City has experienced very few identified illicit discharges and only one publicly reported discharge. Two years of dry weather screening in our early permit experience confirmed that there was no staining to indicate there were discharges we were missing. (Note: part of this is due to the lack of industrial activity in Turner. The other part, however, is the old development style of the community, and the fact that a large amount of older residential areas has open ditches, which make identification of a small illicit discharge far more difficult.)

IDDE-2: Based on this experience, while we are prepared to enforce, we feel it is more important to focus on the work we have identified in the BMPs above: updating our system maps and knowledge, and providing ongoing outreach to continually limit illegal discharge.

The mapping upgrade is particularly important due to the fact that the City has grown substantially over the last five years, with a number of new structural stormwater facilities that are not on our current map. These need to be inventoried for mapping as well as for maintenance activities. In addition, we’ve recently begun implementing some GIS capabilities and it is possible we could move our currently hand-drawn maps to a fully automated GIS platform.

IDDE-3: As the City continues to urbanize and add industrial development, the need for continuing education will grow. Providing both residential and industrial use outreach on what

constitutes illicit discharge will be important in continuing to constrain the number of negatively impactful events.

IDDE-4: Developing a protocol for response activity will ensure that all reported events will be responded to in a uniform manner and give all responders a source for basic information to respond to emergencies.

IDDE-5: The City has an extremely small Public Works staff and does not have the internal capacity to develop the expertise to evaluate particular types of discharge situations. We therefore intend to develop a relationship with the City of Salem and their Environmental Services Division, who already services our sewer system, to provide ongoing support in the area of stormwater discharge. This will help us during event situations, but also provide guidance and ongoing training for our own Public Works staff.

Minimum Control Measure 4: Construction Site Runoff Control

Goal

- 1.) Implement and enforce a program that reduces the discharge of pollutants from construction sites to the MS4.

Through the use of an ordinance or other regulatory mechanism, the program will require erosion and sediment controls and waste materials management controls to be used at all qualifying construction sites. (See table under Compliance Threshold section on page 8 of this document.)

BMPs

CE-1: Operate and enforce a construction site runoff control program based on program documentation supplied to DEQ compliance with the 2019 warning letter.

CE-2: Review and update existing program

- Provide update on annual basis, after construction season activity
- Specifically track and evaluate any repeat violation issues and how they might be avoided and better processed
- Provide BMP evaluation and effectiveness based on inspections and violations
- Ensure public complaints have a role in the review process
- Adopt any enforcement changed prior to October 1 of each year

CE-3: Provide specific review of inspection program

- Evaluate how City can meet program goal requirements within the context of MEP

CE-4: Upgrade program based on additional requirements in the MP

- Provide outreach to developers of new threshold standards for erosion and sediment control plan submission and review when the MP goes into effect.
- Develop appropriate administrative procedures for minimum trigger activity and documentation requirements under Construction Site inspection.

CE-5: Provide ongoing training and education for staff

- Develop resources and relationships to ensure training can be delivered in a timely and effective manner

Measurable Goals

BMP	Milestones	Finish	Deliverables
CE-1	<ul style="list-style-type: none"> • Create a construction site runoff control program. 	Nov 2020	<ul style="list-style-type: none"> • Construction Site Control Program documents.
CE-2	<ul style="list-style-type: none"> • Review plan and update as needed 	On-going	<ul style="list-style-type: none"> • Review documents and updated as needed.
CE-3	<ul style="list-style-type: none"> • Create inspection forms and tracking metric 	June 2021	<ul style="list-style-type: none"> • Create inspection form • Create tracking document
CE-4	<ul style="list-style-type: none"> • Review plan and update as needed for MP requirements 	June 2022	<ul style="list-style-type: none"> • Review documents and updated and needed
CE-5	<ul style="list-style-type: none"> • Provide training 	annually	<ul style="list-style-type: none"> • Training documentation

Responsible Person(s)

This program will require the ongoing coordination of multiple responsible parties. The Development Services Clerk will be responsible for all administrative processing, complaint tracking, inspection documentation, etc. The Public Works Director will be responsible for both plan review and enforcement related fieldwork. The City’s Engineer of Record will be brought in on more complex situations on an as-needed basis. The City Administrator will become involved directly when enforcement actions need to be implemented.

Rationale

CE-1: As a baseline for permit compliance. The City will continue to operate a construction site runoff control program, based on the approved program elements in the resolution to the 2019 warning letter. The program elements will ensure that key elements of permit compliance, including plan submission and review, inspection, and enforcement procedures, are continuously administered by the City.

CE-2: Adaptive management is a key aspect of the MS4 permit program. Since 2020, was the City’s first year of formal engagement with site runoff, it’s an important learning activity to ensure an annual review process for all program components. Without such review, valuable field and administrative lessons will be lost, and appropriate BMP modifications will not be guided by the best information available.

CE-3: In the modified permit, inspections are called out in a more specific way to ensure that appropriate water quality control measures are implemented. The City will review its inspection program independently of other program components to ensure this specific area is properly attended to.

CE-4: The modified permit requires some specific educational and administrative procedures. This BMP is listed separately to ensure that these are not missed amidst the older program design.

CE-5: With growth and changes in work assignments, there needs to be a regular attention to maintaining adequate department training to provide the appropriate program activities and oversight. Since the City has no internal resources to guide this directly, the City will work with the following resources to develop training capacity: stormwater permit partners, EPA information, Oregon-based nonprofits, such as ACWA.

Minimum Control Measure 5: Post-Construction Site Runoff Control

Goal

- 1.) Implement and enforce a program that reduces the discharge of pollutants and controls stormwater runoff from new development and redevelopment to the MS4.

Through the use of an ordinance or other regulatory mechanism, the program will require that qualifying sites use stormwater controls and implement long term operation and maintenance for proper upkeep.

BMPs

PCE-1: Revise and update the existing Post Construction Regulations No. 21-101 to reflect the final conditions of the (MP).

PCE-2: Review ordinances, code, and standards for any barriers to implementing green infrastructure or low impact development. City must review, evaluate, and make necessary amendments at least once within the permit term. (MP)

PCE-3: Review and develop standards that meet the conditions of the modified permit. These should include the following (MP):

- a. Structural stormwater control design and specifications
- b. Site performance standards with a numeric stormwater retention requirement
- c. Treatment standards for sites unable to meet the retention standards
- d. Allowance for alternative compliance for sites unable to meet the retention requirements
- e. Stormwater mitigation options for sites that qualify for alternative compliance

PCE-4: Develop and implement a post construction site runoff plan review procedure. (MP)

PCE-5: Develop strategy so that structural construction controls are appropriately maintained and operated.

PCE-6: Provide the appropriate training, relative to the standards that have been developed and are enforced by the City.

- a. Ensure appropriate resources and relationships are established such that training will be timely and effective.

Measurable Goals

BMP	Milestones	Finish	Deliverables
PCE-1	<ul style="list-style-type: none"> Revise and update ordinance 21-101 	Nov 2024	<ul style="list-style-type: none"> Updated ordinance
PCE-2	<ul style="list-style-type: none"> Review ordinances, codes, and standards for barriers to GI or LID implementation 	June 2023	<ul style="list-style-type: none"> Barriers Recommendations & changes Updated codes, ordinances, or standards
PCE-3	<ul style="list-style-type: none"> Review and develop post construction standards 	Nov 2024	<ul style="list-style-type: none"> Updated standards
PCE-4	<ul style="list-style-type: none"> Develop & implement the site runoff plan review procedures 	Nov 2024	<ul style="list-style-type: none"> Procedure document
PCE-5	<ul style="list-style-type: none"> Develop O&M strategy for structural controls 	June 2022	<ul style="list-style-type: none"> O & M manual
PCE-6	<ul style="list-style-type: none"> Attend training 	annually	<ul style="list-style-type: none"> Training documentation

Responsible Person(s)

Implementing these BMPs will be a collaborative effort between the City's Public Works Department, the Development Services Clerk, and the City's Engineer of Record. The engineer will be responsible for developing and recommending all standards for design, operation and maintenance. Public Works will provide plan review support to the engineer, as well as field inspections. The Development Services Clerk will ensure appropriate administrative procedures are followed and tracked.

Rationale

PCE-1: In February 2021 the City passed ordinance number 21-101: post construction regulations. This ordinance will need to be reviewed and updated to ensure full compliance with the modified permit terms which are going into effect later in 2021.

PCE-2: The City will need to review ordinances, codes and standards looking for barriers to green infrastructure and low impact development. Once barriers have been identified these changes will need to be proposed to the City Council for approval and implementation.

PCE-3: Post-construction program components listed in the BMP must be developed in order to meet compliance with the modified permit. With input from the Public Works Director, the City Engineer of Record will provide the technical expertise to guide these required standards.

PCE-4: Appropriate and effective procedures must be developed in order to ensure site plans are properly reviewed. As standard practice plans which require post construction regulations will be referred directly to the City's Engineer of Record for initial review and insurance ordinance compliance.

PCE-5: In coordination with the IDDE System map update, Public Works will provide field survey of all stormwater controls. Those will be collected into a database for the Development Services Clerk. An Engineer of Record then will provide an evaluation matrix regarding what facilities need area levels of operations and maintenance. Based upon these criteria staff will inspect facilities and evaluate status. Communications will then be initiated with property owners to provide proper education and proper water quality enhancement.

PCE-6: As in other minimum measure sections, due to Turner's small staffing level the City will have to draw on external resources to provide appropriate regular training. Because of the technical sophistication of this topic, we will draw on the City's Engineer of Record, currently AKS Engineering and Forestry, to provide direct assistance and guidance for additional resources. When appropriate, based on adopted standards and program design, the City will continue to work with it. Stormwater permit partners for training and support.

Minimum Control Measure 6: Pollution Prevention and Good Housekeeping for Municipal Operations

Goal

- 1.) Implement a program that ensures prudent pollution prevention and good housekeeping practices are used to reduce the discharge of pollutants from municipal operations.

The program will utilize a variety of methods to train staff on pollution prevention practices and ensure that good housekeeping practices are being utilized during day-to-day municipal activities.

The City has a very small Public Works department, and this is reflected in the smaller scope of work in services the City is able to provide. It does not operate the sewer system, nor does it operate a water sourcing and treatment system. Finally, it has no equipment or staff to do any street maintenance work or stormwater construction on its own.

The most significant areas of municipal operations and interface with stormwater are right-of-way maintenance on local streets, and park activities that have either a direct or indirect connection with stormwater systems.

BMPs

PP-1: Replace the adopted Marion County Public Works Maintenance Manual by developing a City Best Management Practices document for the following City activities:

- a. Right of way maintenance
- b. Application and disposal of pesticides and fertilizers
- c. Maintenance activities in public parks that may affect water quality
- d. Fleet maintenance activities that may affect water quality
- e. Water system maintenance and repair
- f. Stormwater system design, development, and maintenance
- g. Maintenance debris disposal

PP-2: Implement an operation and maintenance strategy for existing structural stormwater controls permitted prior to the effective date of the modified permit. (MP)

PP-3: Maintain and document a regular street sweeping program.

- a. Continue to implement current program of monthly street sweeping

PP-4: Maintain and document a regular catch basin inspection and cleaning program to meet minimum permit regulations. (MP)

PP-5: Implement practices to reduce runoff from pesticides and fertilizers applied to City properties. (MP)

PP-6: Implement and document litter control efforts. (MP)

PP-7: Provide training in operation and maintenance program as it relates to water quality.

Measurable Goals

BMP	Milestones	Finish	Deliverables
PP-1	<ul style="list-style-type: none"> Develop new City BMP manual 	Nov 2024	<ul style="list-style-type: none"> BMP Manual
PP-2	<ul style="list-style-type: none"> Implement O&M strategy for stormwater structures 	Nov 2024	<ul style="list-style-type: none"> Strategy protocols Responsible party list
PP-3	<ul style="list-style-type: none"> Sweep City owned streets monthly 	Ongoing	<ul style="list-style-type: none"> Invoices from contractors
PP-4	<ul style="list-style-type: none"> Inspect/clean catch basins on scheduled basis 	Ongoing	<ul style="list-style-type: none"> Documentation of inspections and/or cleaning
SPP-5	<ul style="list-style-type: none"> Implement practices to avoid runoff of pesticides and fertilizers on City properties 	Nov 2024	<ul style="list-style-type: none"> Documentation of pesticide/fertilizer applications
PP-6	<ul style="list-style-type: none"> Inspect areas of known litter and encourage collection 	Sept 2021	<ul style="list-style-type: none"> Documentation of amount of litter collected
PP-7	<ul style="list-style-type: none"> Provide training for new employees and/or as needed 	annually	<ul style="list-style-type: none"> Training documentation

Responsible Person(s)

Implementing these BMPs will be the responsibility of the Public Works Director. He will be supported in that effort by the City Administrator, Development Coordinator, and Budget Officer. And the Development Services Clerk will track and document activities. Since many activities will be contracted to third parties, part of the City’s responsibility will be to ensure an accurate record of work performed has been kept.

Rationale

PP-1: The City adopted the County’s Best Management Practices in its original permit in 2012. This still serves as a good guide but now needs to be more specifically tailored and updated for the specific activities that the City engages in. This will also provide an opportunity for education regarding activities that affect water quality and what guidance meets the MEP standard for best management.

PP-2: Modified permit BMP...in conjunction with updating of the City's stormwater map listed in the IDDE section, installed structural stormwater controls will be listed on this map. City will develop property and ownership information for each control structure. Contact each responsible party to discuss conditions, needed maintenance and enforcement possibilities.

PP-3: Street sweeping remains one of the most effective ways to decrease water quality impacts from the public transportation system. The City will continue to contract with a third-party vendor to provide services on a regular monthly basis as well as on an emergency needed will-call.

PP-4: Catch basins are the final line of defense for removing waste material before it enters water bodies of the state. Regular inspection and cleaning are therefore an essential activity for water quality enhancement. The City will focus these activities in areas where in the preceding construction year it had more activity and more violations.

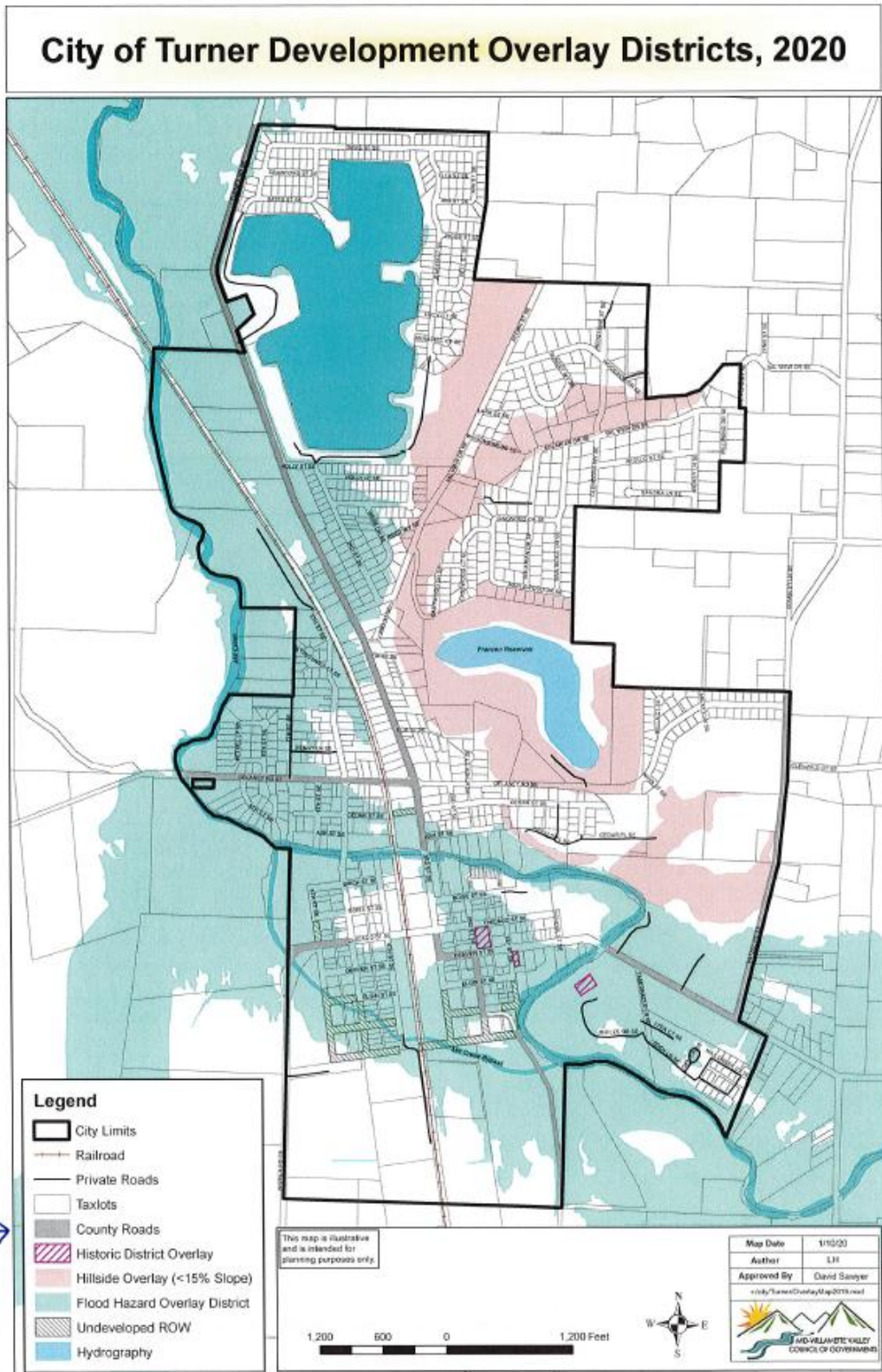
PP-5: When fertilizer, herbicides and pesticides are over-spread, it is not a good use of public money and it contributes to the overall runoff pollution problem. When the City correctly applies these chemicals, we are proving to be good stewards of taxpayer money and the environment.

PP-6: Litter is unsightly and a sad byproduct of our disposable economy but can also cause direct water quality degradation. The City will receive and identify litter concerns and try to address them through our general public outreach programs. The City will ensure that all municipal directed activities, such as parks operations and City sponsored events, have adequate and accessible disposal opportunities.

PP-7: In order to stay current with best practices, ongoing training needs to be provided to City staff. Identifying and then working with third parties such as ACWA will help the City provide more informed training. The City will also work with local partners, Marion County and City of Salem to access their ongoing staff training programs.

Appendices

Appendix A: Overlay Districts Map, 2020



Appendix B: Zoning and Comprehensive Plan Map, 2020

