



City of Ashland, Oregon
STORMWATER MANAGEMENT PROGRAM (SWMP)
TO MEET
NPDES PHASE II MS4 COMPLIANCE



FIVE-YEAR PROGRAM FOR MARCH 2004 - 2009

MARCH 2004

City of Ashland, Oregon
Stormwater Management Program (SWMP)
to Meet NPDES Phase II MS4 Compliance
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CITY OF ASHLAND, OREGON

STORMWATER MANAGEMENT PROGRAM (SWMP)

1.0 INTRODUCTION

This Stormwater Management Program (SWMP) for the City of Ashland, Oregon, has been developed to meet the Municipal Separate Storm Sewer System (MS4) permit requirements of the National Pollutant Discharge Elimination System (NPDES). The MS4 program for small jurisdictions is often called NPDES Phase II. The program outlined in this document was developed for a five-year period.

Although this SWMP has been developed specifically for the City of Ashland, many of the efforts outlined in this program have been coordinated regionally. A Stormwater Advisory Team (SWAT) was formed in 2003 to coordinate the Phase II program within the region. The SWAT is made up of representatives from Ashland, Central Point, Jackson County, Medford, Phoenix and Talent. The municipalities involved in the regional effort hired a consultant to develop individual programs along with documenting a regional approach. The *Rogue Valley Regional NPDES Phase II Stormwater Program Guide* (February 2004) was prepared as a regional guideline for the individual jurisdiction programs. The *Regional Guide* is being submitted along with this SWMP.

The *Regional Guide* describes six minimum measures along with sample checklists, methods to measure activities, and other tools to assist the communities in meeting the Phase II requirements. The Rogue Valley Council of Governments (RVCOG) is working with the jurisdictions to facilitate public education and involvement requirements. This regional teaming arrangement is expected to continue throughout this program.

This SWMP is arranged by the six minimum measures. At the beginning of each section is a summary table listing each proposed activity associated with the measure addressed in that section. The table indicates whether the activity is scheduled to be performed regionally (working together with other jurisdictions) and whether the activity is currently being performed. A “partial” status means some of the activity has been performed, but more is planned to meet requirements. The last five columns indicate which years (during the 5-year permit period) that the activity is scheduled to be performed by the jurisdiction, working either jointly or independently, as applicable. The summary tables are followed by descriptions of schedules, measurable goals, responsible parties, and other implementation issues for each activity. Cost information is included in Appendix A.

The measurable goals proposed for each activity were established through various means. Generally, they represent what seemed reasonable for each situation, based on past experience and common practices for stormwater management. Certain activities have precedent activities, so those are scheduled accordingly. From a practical sense, not all activities can be performed in Year 1, so a conscientious attempt was made to spread them out over the 5-year permit term. Each goal and its frequency/schedule will be evaluated during the annual reporting effort.

2.0 STORMWATER PUBLIC EDUCATION PROGRAM

Ashland intends to participate in a regional stormwater public education program with other members of the SWAT. The SWAT hired the Rogue Valley Council of Governments (RVCOG) to assist in the development of a 5-year program for public education. This program is discussed in detail in the *Regional Guide* and is summarized in Table 2-1. The SWAT members have agreed to pay the cost of having RVCOG implement the 5-year program.

In addition to preparing the 5-year program, RVCOG has implemented a program to educate the public about the regional coordination effort to prepare the 5-year program and what the NPDES Phase II program means to the community. This work included conducting open houses, a television talk show, and presentations to City Councils. The following describes these efforts that have already taken place, along with the plan for the 5-year program.

BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Stormwater Education and Outreach Strategy	Yes	Completed					
Stormwater Brochure for the General Public	Yes	Yes					
Targeted Stormwater Brochures	Yes	Partial					
Storm Drain Stenciling	No	Yes					
Water Quality Education with Schools	Yes	Partial					
Volunteer Groups on Stormwater Education	Yes	Partial					
Stormwater Speakers Bureau	Yes	Yes					
Stormwater Public Service Announcements	Optional	No					
Stormwater Display/Exhibit	Yes	Yes					
Stormwater Web Site	Yes	Partial					

 Activity scheduled for permit year
 No activity scheduled for permit year

2.1 Develop a Stormwater Education and Outreach Strategy

[*Regional Guide—Section 2.3.1*]

The following 5-year program is defined as the regional strategy for implementing stormwater education. The program was developed by RVCOG working closely with the members of the SWAT. The strategy will follow guidelines prepared in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*.

Schedule & Completion Date: The strategy has been developed as part of the *Regional Guide* and therefore this task is complete.

Measurable Goal: The SWAT intends to meet bi-monthly or quarterly (every two or three months) to determine the effectiveness of the program. If it is determined minor modifications to the program are required to reach a larger audience these will be outlined in the annual reporting.

Responsible Party: RVCOG will be implementing the program under the direction of the City of Ashland's Project Manager.

2.2 Stormwater Brochure for the General Public

[*Regional Guide—Section 2.3.2*]

RVCOG has already developed a stormwater brochure for the regional cities and will continue to develop these for the region.

The City of Ashland includes a newsletter, "City Source" when distributing monthly utility bills. This document is provided to educate the residents about utility related issues, stormwater articles will be included in future issues of the newsletter.

Schedule & Completion Date: The development and distribution of general stormwater brochures will be facilitated regionally starting in 2004.

Measurable Goal: One general mailing in year two and year four.

Responsible Party: RVCOG will be implementing the program under the direction of the City of Ashland's Project Manager.

2.3 Targeted Stormwater Brochures

[Regional Guide—Section 2.3.3]

Within the first two years, RVCOG will develop a targeted brochure for erosion control (see Section 5.6). The brochure will discuss the need for erosion control along with general prevention and where more information can be obtained. The brochure will be included in all building permit application packages. Other targeted brochures might include homeowners along creek corridors, or brochures describing new development requirements as part of this program.

Schedule & Completion Date: Develop erosion control brochure by year two. Develop second targeted brochure by year five. Targeted group to be determined by SWAT in year 3.

Measurable Goal: Erosion Control targeted brochure included in all building permits by year three.

Responsible Party: RVCOG will be implementing the program under the direction of the City of Ashland's Project Manager.

2.4 Storm Drain Stenciling

[Regional Guide—Section 2.3.4]

The City of Ashland currently has a Storm Drain Stenciling Program. The City of Ashland solicits volunteer organizations to stencil the words "Dump No Waste—Drains to Streams" on city storm drains. A majority of the storm drain within the business area have been completed and it is estimated that approximately 1/3 of the storm drain have been stenciled city wide.

Schedule & Completion Date: The City will continue to stencil storm drains and catch basins which have not been stenciled or re-stencil inlets where the markings have worn off. City Staff will investigate the wear of the stenciling in year three and five to determine if the storm drains will need repainting. All storm drains of new development and road improvement projects will be painted following project completion.

Measurable Goal: Measurable goal will be to monitor existing stencil for wear and to include storm drain stenciling in the City final inspection for new development.

Responsible Party: City of Ashland—Public Works Director.

2.5 Promote Water Quality Education with School Districts

[Regional Guide—Section 2.3.5]

The North Mountain Park Nature Center in Ashland was created to "To promote greater community awareness, understanding and enjoyment of the local natural environment and to foster stewardship through educational programs and activities." The center also offers special classes and lectures for adults and children. A wetland is located at the site, which encourages education about water quality issues. A new water quality wetland is also proposed, which will include an on-site water quality education display. Through the SWAT, the City of Ashland will continue to coordinate and promote stormwater Education. This effort will be lead by RVCOG and include meeting with educators to determine how RVCOG Staff can provide educational instruction and material to local educators. The coordination will include working with local organizations and school districts to develop a water quality education program. The City will follow guidelines prepared in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide* for future education projects.

Details of how the regional effort will assist educators will be determined based on the initial meetings with the educators.

Schedule & Completion Date: The regional effort will start approaching school districts and educators in year three to determine the best methods to coordinate efforts.

Measurable Goal: Contact all school districts within the storm drain system boundary by the end of permit year 3. Measurable goals for the detailed education will be based on the approach chosen to assist educators. The goals and achievements will be presented in the annual reporting.

Responsible Party: RVCOG will be implementing the program under the direction of the City of Ashland's Project Manager.

2.6 Work with Volunteer Groups on Stormwater Education Projects

[Regional Guide—Section 2.3.6]

Ashland will continue to work with local volunteer organizations to discuss opportunities to integrate stormwater/water quality information into existing education projects. The program will follow guidelines prepared in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*.

Currently, the City of Ashland works with volunteers through the North Mountain Park Nature Center and through their storm drain stenciling program to promote stormwater quality education. The City also encourages volunteers to participate in the Adopt a Street Program.

Adopt a Street Program: This program allows businesses, service clubs, schools, and organizations to adopt an arterial or collector street. The groups is asked to adopt the street for at least 1 year and conduct litter clean ups at least every 3 months. Individual residents, neighborhoods, or families can also adopt streets in their neighborhood. They are asked to adopt the street for at least a 1 year period and clean it on an as needed basis.

Storm Drain Stenciling Program: The City will supply all equipment for "adopt a street" program participants or other volunteers to stencil the words "Dump No Waste—Drains to Streams" on storm drains.

Schedule & Completion Date: The regional effort will assist any groups seeking opportunities to help educate the general public or specific groups concerning water quality. However, in year 3 the regional effort through the RVCOG will proactively seek groups to assist in stormwater education.

Measurable Goal: Assist any groups actively contacting the SWAT. In years 3 through 5 actively contact at least five volunteer organizations per year to discuss and promote stormwater education.

Responsible Party: RVCOG will be implementing the program under the direction of the City of Ashland's Project Manager.

2.7 Develop a Stormwater Speakers Bureau

[Regional Guide—Section 2.3.7]

RVCOG has facilitated stormwater presentations for the region. Two presentations (Open Houses) have been given in the region over the past year and another is scheduled in the spring of 2004. The three Open Houses are an effort to educate the public about the regional effort for developing Stormwater Management Plans to meet the NPDES Phase II requirements. The meetings were held (or will be held) at three different locations in order to reach a broad audience. Participants will learn about the regional effort to develop a plan for effective stormwater management, and how the resulting program will help protect streams and wetlands. Topics included: impacts of stormwater, methods for managing stormwater runoff, benefits of stormwater management, regulatory requirements, and municipal plans and programs.

The Open Houses were as follows:

- Monday, November 17, 2003 from 4-7 pm held in Ashland
20 in attendance
- Thursday, January 22, 2004 from 4-7 pm held in Medford
25 in attendance
- The Spring 2004 meeting date and location to be determined

RVCOG participates in a bi-monthly community television program "Regional Focus" which educates the public on local issues. On November 10, 2003, the show focused on stormwater and the regional effort for developing Stormwater Management Plans to meet the NPDES Phase II requirements. The show was recorded and repeated 8-10 times over the month. The show covered topics such as:

- The dynamics of stormwater runoff
- The importance of stormwater management

- The benefits of stormwater management
- Stormwater pollution prevention
- What the public can do if they see a problem

Schedule & Completion Date: Speakers are available from RVCOG and the SWAT participating communities. The SWAT will maintain available speakers on stormwater issues.

Measurable Goal: Keep records of any stormwater presentations and the number of attendees or number of times the program was repeated.

Responsible Party: RVCOG will be implementing the program under the direction of the City of Ashland's Project Manager.

2.8 Create Stormwater Public Service Announcements [Optional]

[Regional Guide—Section 2.3.8]

A public service announcement (PSA) has not been scheduled within the first 5 years of the permit. This alternative will be investigated if grant funding becomes available or if it is found that other public education efforts are not adequate. RVCOG will investigate grant funding to broaden stormwater education including a Public Service Announcement.

Schedule & Completion Date: Not scheduled for first five years of the program.

Measurable Goal: The number of Public Service Announcements will be kept if any occur during the first five years.

Responsible Party: None at this time.

2.9 Design a Stormwater Display

[Regional Guide—Section 2.3.9]

RVCOG has developed a large assortment of stormwater exhibits and display materials to be used throughout the region. RVCOG will periodically update these materials and make them available to the SWAT participating communities and others.

The City of Ashland plans to include a stormwater and water quality display near the wetlands in cooperation with the North Mountain Park Nature Center.

Schedule & Completion Date: These items already exist and will be periodically updated as needed.

Measurable Goal: This item will not have a measurable goal. RVCOG and several of the SWAT communities already have displays and more will be created as needed.

Responsible Party: RVCOG will be implementing the program under the direction of the City of Ashland's Project Manager.

2.10 Create a Stormwater Web Site

[Regional Guide—Section 2.3.10]

RVCOG has begun developing a stormwater section on their website. At this time the website includes a definition of stormwater, impacts to stormwater and stormwater related links. The website is located at:

http://rvcog.org/MN.asp?pg=WR_Stormwater

Ashland will also develop a stormwater section on their website. The website will contain educational information for a variety of target audiences.

Schedule & Completion Date: Complete a stormwater web site section by the end of permit year 2. The site will be updated as needed.

Measurable Goal: The measurable goal is simply accomplishing the development of stormwater web site section by the end of permit year 2.

Responsible Party: RVCOG and City of Ashland—Public Works Director.

3.0 STORMWATER PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM

Ashland intends to participate in a regional stormwater public involvement and participation program with other members of the SWAT. The SWAT hired the Rogue Valley Council of Governments (RVCOG) to assist in the development of a 5-year program for public involvement. This program is discussed in detail in the *Regional Guide* and is summarized in Table 3-1. The SWAT members have agreed to pay the cost of having RVCOG implement the 5-year program.

The following describes the 5-year program.

BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Public Review/ Public Meetings	Yes	Partial					
Distribute News Releases	Yes	Partial					
Stormwater Advisory Panel	Yes	Partial					

 Activity scheduled for permit year
 No activity scheduled for permit year

3.1 Public Review/Public Meetings

[Regional Guide—Section 3.3.1]

The City of Ashland will work with the SWAT to investigate methods to encourage the involvement of the public in stormwater activities. A significant amount of public input and involvement has been included in the development of the *Regional Guide*. This effort will continue throughout the 5-year program and the SWAT is committed to working with interested individuals or groups. The program discussed in the *Regional Guide* will be developed to allow public comment on stormwater programs and projects. Once the stormwater management plan is completed Ashland will hold public meetings to solicit public review of the plan.

Schedule & Completion Date: The regional effort for public review and public meetings started prior to the submittal of this program to the Oregon Department of Environmental Quality (DEQ). It will continue throughout the 5-year program.

Measurable Goal: Hold at least one public meeting and publish at least two public notices during each year of the 5-year program.

Responsible Party: RVCOG will be implementing the program under the direction of the City of Ashland's Project Manager.

3.2 Distribute News Releases

[Regional Guide—Section 3.3.2]

RVCOG distributed a news release to advertise the Open Houses for the Regional Stormwater Planning Project. There have been articles and news stories on stormwater, but more detailed articles are expected once the plans are developed.

The local news station KDRV TV-12 interviewed members of the Stormwater Advisory Committee (SWAT) following their meeting on Friday, January 23, 2004, in regard to the stormwater plans and programs being developed in the region.

Schedule & Completion Date: The distribution of news releases will be provided when the local press is available and interested in stormwater topics. No schedule for this has been developed and opportunities will depend on the news agencies' interest in stormwater activities.

Measurable Goal: At least one news release story on the jurisdictions stormwater program will be distributed to local papers each year starting in permit year 2.

Responsible Party: RVCOG will be implementing the program under the direction of the City of Ashland's Project Manager.

3.3 Stakeholder Advisory Panel

[Regional Guide—Section 3.3.3]

The SWAT has been developed for the region to coordinate regional stormwater programs. The SWAT is a stormwater advisory panel with key stakeholders from each jurisdiction and will solicit input on the development and implementation of the stormwater program. Input will be solicited from representatives of businesses, industries, conservation groups, residential and civic associations, and other interested stakeholders.

Schedule & Completion Date: The SWAT has already been developed and the panel will have bi-monthly or quarterly meetings to coordinate the regional effort. Input from the representatives of the community will be solicited as needed for key decisions in the future.

Measurable Goal: Dates and attendance will be kept for each meeting. A summary of topics discussed and key decisions will be kept and submitted as part of the annual report.

Responsible Party: City of Ashland's Project Manager.

4.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

In order to meet regulations under 40CFR122.34(b)(3), an Illicit Discharge Detection and Elimination Program will be developed for the City of Ashland. The following presents the requirements for the program, how they are being achieved and the implementation schedule.

TABLE 4-1.
ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Create a System Map	No	Completed					
Update System Map	No	Ongoing					
Stormwater Ordinance	No	Completed					
Illicit Discharge Plan	No	No					
Field Inspections	No	Partial					
Spill Response Plan (create new plans or review and update existing plans)	No	Partial					
Enforcement Plan	No	Partial					
Training for Staff	No	No					

- Activity scheduled for permit year
- No activity scheduled for permit year

In addition to the following required best management practices (BMPs), brochures, including information about illicit discharges will be created for the general public as a part of the Public Education requirements.

4.1 Storm Sewer System Map

[Regional Guide—Section 4.3.1]

A storm sewer system map already exists for the City of Ashland and is included in this submittal. The City's drainage system consists of storm drain pipelines and natural creeks.

The map is included in Appendix B.

The storm sewer system map will be updated as a part of the Illicit Discharge Detection and Elimination activities and the Post-Construction program activities. As new development is permitted the drainage system will be added to the base map.

Schedule & Completion Date: The City already has a system map.

Measurable Goal: The storm sewer system map will be updated annually.

Responsible Party: The City of Ashland - Public Works Director.

4.2 Ordinance to Prohibit Non-Stormwater Discharges

[Regional Guide—Section 4.3.2]

Under Section 15.16.030 of the City's current municipal code it is unlawful to deposit substances in the public drainage system that could cause damage to that system. Under Section 15.16.340 and 1.08 of the City's current municipal code provides the City with penalties to enforce the municipal code.

Schedule & Completion Date: No changes are proposed for the City's Municipal code.

Measurable Goal: No measurable goal for this activity.

Responsible Party: The City of Ashland - Public Works Director.

4.3 Detect and Address Non-Stormwater Discharges

[Regional Guide—Section 4.3.3]

An Illicit Discharge Plan will be prepared as outlined in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*. This will include a procedure for the inspection and detection of illicit discharges. The following components will be included in the plan:

1. Identification of priority areas for assessment
2. Field assessment activities
3. Routine schedule for system inspection
4. Characterization of any discharges found
5. Procedures to trace an illicit discharge
6. Procedures to remove an illicit discharge

Currently the City does not have a formal illicit discharge detection program. Illicit discharges are investigated as necessary, such as if an odor is reported.

The new stormwater ordinance discussed under Section 4.2 will provide the City with regulations to remove illicit discharges if detected.

Schedule & Completion Date: City Staff currently inspect outfalls and the drainage system to determine if they are functioning as designed. The Illicit Discharge Plan will be developed in year 3 of the 5-year program. Using the plan City staff will also inspect for dry weather flow and other items indicating potential illicit discharges. Once implemented in year 3 this project has no completion date.

Measurable Goal: Implement the program by the end of permit year 3.

Responsible Party: The City of Ashland - Public Works Director.

4.4 Conduct Field Inspections

[Regional Guide—Section 4.3.4]

This activity is simply implementing the Illicit Discharge Plan developed under Section 4.3 of this submittal. The plan will develop a schedule and reporting procedures to be used when conducting these inspections. The outline of this plan can be found in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*. At a minimum, each outfall shall be inspected on a 3-year rotation.

Appropriate actions will be taken to determine the source of any illicit discharges found during the inspections. The City has a video truck which is primarily used for the sanitary sewer system; it can be used to help trace down dry weather flows in the storm system.

Schedule & Completion Date: The Illicit Discharge Plan will be developed in year three of the 5-year program. Inspection and reporting along with starting a cycle to insure all outfalls are included in the inspection rotation and will start in year four following the development of the plan.

Measurable Goal: Continue current inspection process until detection plan with inspection rotation is developed. Following development of the Illicit Discharge Plan begin implementing the plan.

Responsible Party: The City of Ashland - Public Works Director.

4.5 Spill Response Plan

[Regional Guide—Section 4.3.5]

A Spill Response Plan shall be prepared as outlined in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*.

The City's current emergency spill response plan is conducted through the fire department; Public Works has the capability on a limited basis to conduct spill containment practices. The current fire departments spill containment practices need to be reviewed to determine potential effects on natural water bodies.

Schedule: Public Works staff is currently reviewing the Spill Response Plan and how it relates to the waste water system. A review of the code and how it relates to the drainage system will also be conducted. This plan will be reviewed in year 1. City Crews will continue to address minor spills within the City and methods for cleaning up spills will be part of a review of maintenance procedures under the Pollution

Prevention Program for Municipal Operations. The practices for cleaning small spills by public works maintenance staff will be reviewed to determine if a formal plan is required.

Measurable Goal: Review spill plan by the end of permit year 1

Responsible Party: The City of Ashland - Public Works Director.

4.6 Plan for Enforcement Actions

[Regional Guide—Section 4.3.6]

After discovering an Illicit Discharge, the City of Ashland will first attempt to work with the responsible party to eliminate the problem or to route the flow to the Sanitary Sewer, if allowable. Under Section 1.08.020 of the municipal code the City can fine a party \$500 per day for an infraction. The City will also continue to work with the DEQ to eliminate spills and illicit discharges when discovered.

Schedule: No changes are proposed for the City's Municipal code

Measurable Goal: No measurable goal for this activity.

Responsible Party: The City of Ashland - Public Works Director.

4.7 Train Municipal Staff on Spill and Illicit Discharge BMPs

[Regional Guide—Section 4.3.7]

Once the above items are completed, relevant municipal staff will be trained on the proper BMPs to use for spill response and illicit discharge detection and removal. The staff training will occur in combination with training for Pollution Prevention. "Refresher" training will update staff on changes to the procedures as needed.

Schedule & Completion Date: The training of staff will begin in year one with refresher courses and courses for new staff conducted annually. Selected staff will go to regional training classes and develop a program to train all staff within the City crews.

Measurable Goal: The number of staff time spent in class along with class subjects will be documented and reported annually.

Responsible Party: The City of Ashland - Public Works Director.

5.0 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL PROGRAM

In order to meet regulations under 40 CFR 122.34(b)(4), the City of Ashland will develop, implement, and enforce a program to reduce pollutants in any stormwater runoff from construction activities. The regulations covering this activity will be part of the overall City stormwater ordinance being developed in the first year of the 5-year program. The size of the construction activity covered by the ordinance will be determined during the ordinance development. Meetings with City Council however, will cover, at a minimum, construction activity of 1-acre or larger. The following presents the requirements for the program, how they are being achieved, and the implementation schedule.

TABLE 5-1.
CONSTRUCTION SITE STORMWATER RUNOFF CONTROL PROGRAM

BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Develop & Adopt Stormwater Ordinance	No	Partial					
Develop Regional Erosion Control Manual (or adopt state or other manual)	No	No					
Develop Expertise in Review & Inspection (Staff Training)	No	No					
Training for Contractors and Developers	Possibly	No					
Review Erosion Control Plans	No	No					
Receive Public Inquires	No	No					
Inspect Construction Sites	No	No					
Information Brochures for Contractors	Yes	No					

	Activity scheduled for permit year
	No activity scheduled for permit year

5.1 Adopt an Erosion and Sediment Control Ordinance

[Regional Guide—Section 5.3.1]

Ashland will adopt a stormwater ordinance that will include illicit discharges, construction site runoff, and post construction runoff. The ordinance will be prepared as outlined in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*.

Ashland currently has two ordinances that include guidelines for sediment and erosion control.

18.61 Tree Protection: This ordinance provides the regulatory guidelines for tree removal in the City of Ashland. Under this ordinance, development requiring a Physical Constraints Review Permit must submit a plan with proposed method of erosion control, water runoff control, and tree protection for the development.

18.62.080 Development Standards for Hillside Lands: These standards provide supplemental regulations to development that is classified as hillside. These standards require that development minimize solids runoff. Erosion control blankets and native planting or similar vegetation which will survive and stabilize the surface are required on fills slopes. An erosion control plan is required for hillside development, the plans must be approved by a hearing and prior to construction. Development must conform to stormwater runoff standards provided in the ordinance. The ordinance also provides requirements for protection of trees to maintain slope stability.

Schedule: The stormwater ordinance is scheduled to be prepared in the first year and adopted in the second year of the five year program.

Measurable Goal: Adopt Ordinance and Design Manual by the end of permit year 2

Responsible Party: The City of Ashland - Public Works Director.

5.2 Train Plan Reviewers and Field Inspectors

[Regional Guide—Section 5.3.2]

Once an ordinance is in place, Ashland will train city staff responsible for reviewing plans and inspecting construction sites to ensure that erosion and sediment control BMPs are properly installed and maintained. If possible, training will be coordinated with training on post-construction stormwater management. “Refresher” training will update staff on changes to the procedures as needed. Ashland may participate in a regional training program. This might include training programs by DEQ and RVCOG.

Schedule & Completion Date: Train plan reviewers and field inspector by the end of permit year 2

Measurable Goal: The number of hours spent in class along with class subjects will be documented and reported annually.

Responsible Party: The City of Ashland – Public Works Director.

5.3 Review Site Plans for Erosion and Sediment Controls

[Regional Guide—Section 5.3.3]

Once a stormwater ordinance is adopted for Ashland, construction site plans will be reviewed to ensure they are in compliance with local ordinances and stormwater management manuals. Plans will also be reviewed for appropriate use of erosion and sediment BMPs as well as post-construction controls. Currently only plans requiring a Physical Constraint Permit review must submit erosion and sediment control plans.

Schedule & Completion Date: Start reviewing site plans for erosion control beginning in year 3. This will allow development of the stormwater ordinance and training of staff. Until that time the 1200-C permit process administered by DEQ and the Physical Constraint Permit will be used to review and control construction runoff in Ashland.

Measurable Goal: Once this effort has started, City staff will monitor the number of permit reviews, the number of on-site inspections, and the number of on-site revisions required. If enforcement is required this will also be recorded. All records will be reported annually.

Responsible Party: DEQ for first two years; Ashland Public Works Director beginning in Year 3.

5.4 Receive Information from Public

[Regional Guide—Section 5.3.4]

On brochures, permit applications, and other publications, the phone number of the City’s Public Works Department will be given to allow the public to report complaints and/or comments from the general public regarding construction site runoff. These comments and follow-up activities will be monitored internally by City Staff. The City’s construction inspector will receive information on the complaint by the end of the day and will be responsible for following up on each complaint within 2 days. The phone number will be published in the local phone book, in stormwater brochures, and on both the RVCOG and the City of Ashland stormwater website.

Schedule & Completion Date: All new Erosion Control Publications will include the phone number for complaints.

Measurable Goal: Record the number of complaints received and handled, and submit with the annual report.

Responsible Party: The City of Ashland - Public Works Director.

5.5 Inspect Construction Sites

[Regional Guide—Section 5.3.5]

All construction sites which are required to submit site plans for erosion and sediment control will be inspected to ensure that the selected BMPs are installed and maintained correctly. Site plans must also reflect changes made on-site after the plans were reviewed. The frequency of inspection will be determined based on the complexity of the project and the prioritization criteria presented in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*. Each construction site shall be inspected at least once.

Schedule & Completion Date: Inspection will start in permit year 3 of the program.

Measurable Goal: Records of the inspections and any follow-up work will be kept and submitted annually.

Responsible Party: The City of Ashland - Public Works Director.

5.6 Provide Information on Training for Construction Operators

[Regional Guide—Section 5.3.6]

A brochure on construction site erosion control and post construction controls will be prepared and distributed (see Section 2.3). This will include brief descriptions of methods, sources of information for erosion control methods, including DEQ's manual and web sites. The brochure will also include information on training available for local construction operators. If contractors require further training following the classes provided by DEQ following the development of their Erosion Control Manual the City will work with others in the region to provide further training.

Schedule & Completion Date: Develop Erosion Control brochure by year 2. It is assumed the DEQ training courses will be enough at this time.

Measurable Goal: Document the distribution of the erosion control brochure and the scheduled classes along with attendance, and submit with the annual report.

Responsible Party: The City of Ashland - Public Works Director.

6.0 POST-CONSTRUCTION STORMWATER MANAGEMENT PROGRAM

In order to meet regulations under 40 CFR 122.34(b)(5), the City of Ashland will develop a program for post construction stormwater management. The following presents the requirements for the program, how they are being achieved and the implementation schedule.

BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Develop & Adopt Stormwater Ordinance	No	Partial					
Develop (or adopt existing) Regional Design Manual [opt. each Jurisdiction Develop Manual]	No	No					
Develop Expertise in Review & Inspection (Staff Training)	No	No					
Training for Local Engineers and Developers	Yes	No					
Review of Site Plans and Inspection for Post-Construction BMPs	No	No					

	Activity scheduled for permit year
	No activity scheduled for permit year

6.1 Ordinance Requiring Post-Construction Control

[Regional Guide—Section 6.3.1]

Ashland will adopt a stormwater ordinance that will include illicit discharges, construction site runoff, and post construction runoff requirements. The ordinance will be prepared as outlined in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*.

Ashland is currently working with the City of Medford to develop Engineering Development standards, which will include requirement for post development runoff control.

Schedule & Completion Date: The stormwater ordinance is scheduled to be prepared in the first year and adopted in the second year of the five year program.

Measurable Goal: Adopt ordinance by the end of permit year 2

Responsible Party: The City of Ashland - Public Works Director.

6.2 Develop a Plan to Address Post-Construction Runoff

[Regional Guide—Section 6.3.2]

Ashland will either develop a stormwater design manual or work with local jurisdictions to adopt a regional design manual for addressing stormwater issues. The manual will include construction site erosion and sediment controls, as well as design guidelines for post-construction water quality BMPs and runoff quantity control.

The manual will either be newly developed or by adoption of an existing manual. Ashland has agreed to work with the regional SWAT in an attempt to bring regional consistency with development standards and runoff control standards.

Training for local engineers and developers will be available regionally, or locally, depending upon how the manual is developed.

Schedule & Completion Date: Implement plan by the end of permit year three

Measurable Goal: The adoption of the ordinance by year two and design manual by year three will be the measurable goals for this activity.

Responsible Party: The City of Ashland - Public Works Director.

6.3 Training for Plan Reviewers and Field Inspectors

[Regional Guide—Section 6.3.3]

Once an ordinance is in place, Ashland will train City staff responsible for reviewing plans and inspecting construction sites to ensure that appropriate post-construction stormwater management is employed. If possible, training will be coordinated with training on erosion and sediment control BMPs. “Refresher” training will update staff on changes to the procedures as needed.

Schedule & Completion Date: The training of staff will begin in year one with refresher courses and courses for new staff conducted annually. Selected staff will go to regional training classes and develop a program to train appropriate staff within the city crews.

Measurable Goal: The number of hours spent in training along with subjects will be documented and reported annually.

Responsible Party: The City of Ashland - Public Works Director.

6.4 Site Plan Review for Post-Construction BMPs

[Regional Guide—Section 6.3.4]

Once the stormwater ordinance is adopted and design criteria or a design manual is developed, the City staff will start reviewing permit drawings for compliance with local ordinances and stormwater management manuals. Plans will also be reviewed for appropriate post-construction controls as well as erosion and sediment BMPs.

Schedule & Completion Date: Start reviewing site plans for post construction BMPs beginning in year 3. This will allow development of the stormwater ordinance and training of staff.

Measurable Goal: Once this effort has started City staff will monitor the number of plan reviews, the number of on-site inspections, and the number of on-site revisions required. If enforcement is required this will also be recorded. All records will be reported annually.

Responsible Party: The City of Ashland - Public Works Director.

6.5 Inspections of Structural Post-Construction BMPs

[Regional Guide—Section 6.3.5]

Ashland will develop an operations and maintenance program for public and private post-construction stormwater controls. The program will include requirements for private property owners to maintain facilities, a database of structural BMPs, inspection schedules and procedures, and an inspection form.

Schedule & Completion Date: Require that public and private development with post-construction BMPs include an operations and maintenance program beginning in year 3. This will allow development of the stormwater ordinance and training of staff. Inspection will start in year 3 of the program.

Measurable Goal: Once this effort has started, City staff will keep records of the number of BMPs installed, inspection schedules, and procedures. The City will also maintain copies of the inspection reports for each facility. If enforcement is required, this will also be recorded. All records will be reported annually.

Responsible Party: The City of Ashland - Public Works Director.

7.0 POLLUTION PREVENTION IN MUNICIPAL OPERATIONS PROGRAM

In order to meet regulations under 40 CFR 122.34(b)(6), the City of Ashland will develop a formal operations and maintenance plan. The following presents the requirements for the plan, how they are being achieved and the implementation schedule.

Basically most City operations already meet the requirements for NPDES and the Operation and Maintenance (O&M) Plan will be a documentation of existing activities with minor modifications to reduce pollutants.

TABLE 7-1.
POLLUTION PREVENTION IN MUNICIPAL OPERATIONS PROGRAM

BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Develop O&M Plan	No	Partial					
Develop Park/Open Space O&M Guide	No	Partial					
Vehicle/Equipment Washing BMPs	No	Completed					
New Construction and Land Disturbance	No	Partial					
Dust Control BMPs	No	No					
Stormwater System Maintenance	No	Yes					
Open Channel/Structural BMPs	No	Partial					
Deicing BMPs (i.e. sanding and sweeping)	No	Yes					
Flood Management BMPs	No	Partial					
Training for Employees on O&M	No	Yes					

	Activity scheduled for permit year
	No activity scheduled for permit year

7.1 Operation and Maintenance Plan

[Regional Guide—Section 7.3.1]

The City of Ashland will review existing municipal O&M activities and document the activities in an O&M Plan that will address municipal activities. The O&M Plan shall include the following:

- Descriptions of the required maintenance activities and procedures as it relates to existing municipal operations and programs
- A list of responsible department and personnel for each activity
- A schedule of activities, including maintenance, inspections & reports.
- Review the maintenance of Parks and open space.
- Review use of herbicides and pesticide and maintain records when applied.

The following sections discuss the particular maintenance activities to be address is further detail. Practices for each maintenance activities will be prepared as outlined in the *Rogue Valley Regional NPDES Phase II Stormwater Program Guide*.

Schedule & Completion Date: Prepare O&M plan in year one and implement the plan by the end of permit year 2

Measurable Goal: Plan preparation and records of all herbicide and pesticide use are the measurable goals for this activity.

Responsible Party: The City of Ashland - Public Works Director.

7.2 Park and Open Space Maintenance

[Regional Guide—Section 7.3.2]

Ashland will implement park and open space maintenance pollution prevention/good housekeeping practices as developed in the O&M Plan. These practices include fertilizer, herbicide and pesticide application; vegetation maintenance and disposal; and trash management. Currently, the any herbicide or pesticide application is performed by a licensed applicator. Records of all herbicide and pesticide use are kept.

Schedule & Completion Date: Same as Section 7.1 above.

Measurable Goal: Same as Section 7.1 above.

Responsible Party: The City of Ashland - Public Works Director.

7.3 Vehicle and Equipment Washing

[Regional Guide—Section 7.3.3]

The City of Ashland has a covered, self contained vehicle washing facility with a sedimentation basin and is discharged to the sanitary sewer. Once the O&M Plan is adopted, the City will continue to follow practices developed in the Plan.

Schedule & Completion Date: Ashland currently meets the vehicle and equipment washing requirements.

Measurable Goal: No new measurable goal for this activity.

Responsible Party: The City of Ashland - Public Works Director.

7.4 New Construction and Land Disturbances

[Regional Guide—Section 7.3.4]

Ashland currently requires that BMPs for public construction projects conducted by the City be reviewed for erosion and sediment control. This practice will continue once the O&M Plan is developed. Public construction projects will be required to follow same requirements and procedures as private development. Construction will be required to follow local ordinances, and stormwater management manuals.

Schedule & Completion Date: Ashland will continue to review public construction projects for erosion and sediment control.

Measurable Goal: Records of the BMPs for public construction projects shall be kept; inspection reports and any follow-up work will be kept and submitted annually.

Responsible Party: The City of Ashland - Public Works Director.

7.5 Dust Control Practices

[Regional Guide—Section 7.3.5]

Ashland will implement BMPs for dust control from public construction projects as developed in the O&M Plan. Public construction projects will be required to follow appropriate BMPs to minimize and control dust.

Schedule & Completion Date: Ashland will develop a dust control program for public construction projects as part of the O&M Plan. The program will be implemented by the end of permit year 5.

Measurable Goal: Implement dust control program by the end of permit year 5. Keep records of projects which included dust construction.

Responsible Party: The City of Ashland - Public Works Director.

7.6 Stormwater System Maintenance

[Regional Guide—Section 7.3.6]

Ashland will implement stormwater system maintenance as developed in the O&M Plan. Catch basins and other stormwater facilities will be inspected and maintained regularly. Waste from the stormwater facilities will be disposed of properly, and records of cleaning and maintenance will be kept.

- Video new lines to verify proper construction and existing lines as needed

- Street Sweeping—arterials, downtown and in the business district once per week, residential streets every 3 months and parking lots once per month
- The storm drain system is cleaned as needed (hydrovac is used for cleaning)

Waste from storm drain cleaning is taken to the City’s spoils site. If the cleanings are known to be contaminated with wastewater, the cleanings are run through the headworks of the wastewater treatment plant.

Schedule & Completion Date: Ashland will continue current storm drain system maintenance activities.

Measurable Goal: Keep records of storm drain system cleaning and maintenance activities and submit in annual report. Waste disposal operations will be included in the records.

Responsible Party: The City of Ashland - Public Works Director.

7.7 Open Channels and Structural Stormwater Controls

[Regional Guide—Section 7.3.6.1]

Ashland will implement open channel and structural stormwater control maintenance as developed in the O&M Plan. Open channel and structural stormwater controls will be inspected and maintained regularly. Waste from the stormwater controls will be disposed of properly, and records of cleaning and maintenance will be kept.

Schedule & Completion Date: Implement practices by the end of permit year 3

Measurable Goal: Maintain records of maintenance activities and submit in annual report.

Responsible Party: The City of Ashland - Public Works Director.

7.8 Road, Highway and Parking Lot Maintenance

[Regional Guide—Section 7.3.6.2]

The City of Ashland’s Street Division currently follows pollution prevention/good housekeeping practices with their sanding and street sweeping. Once the O&M Plan is adopted, the Street Division will continue to follow practices developed in the Plan for deicing and snow removal.

The City conducts street sweeping on arterial streets, in the business district, and downtown once a week. Residential areas are swept every 3 months, and bike paths are swept and parking lots are swept once per month. Ashland uses a regenerative air street sweeper and a mechanical street sweeper. Waste from street sweeping are stored and then trucked to a landfill.

Schedule & Completion Date: Current activity will be continued.

Measurable Goal: Maintain records of maintenance activities and submit in annual report.

Responsible Party: The City of Ashland - Public Works Director.

7.9 Flood Management Projects

[Regional Guide—Section 7.3.6.3]

Ashland will implement flood management project evaluation and review procedures as developed in the O&M Plan. All new flood management projects will include water quality considerations. Priority existing flood management projects will be identified and re-evaluated with water quality considerations.

The June 2000 *Stormwater and Drainage Master Plan* for the City of Ashland includes alternatives for improving water quality and flooding where appropriate. Additionally, stream corridor protections were recommended in the Plan to provide improvements to water quality. The City has constructed some of the improvements and has scheduled others as future CIP projects.

The City also actively seeks opportunities for combined public/private projects that address stormwater issues and education such as the Riverwalk project.

CIP Projects with Water Quality Components:

Water Quality Improvements—Basins/Riparian: These include non-traditional water quality improvements along creeks and water ways. The projects will provide water quality enhancements by improving surface water drainage areas, detention basins or landscaping features to retain and treat water prior to discharging into streams. In previous years these funds have augmented the Roca Creek Project, North Mountain Park, and Elks Parking Lot drainage project. Elks Parking Lot, which included a bioswale was the first such

project completed by the city. Similar projects are planned for additional bioswale or wetland treatment systems along with detention/retention basins and trees to help cool the water temperatures and filter out sediment and petroleum products.

Beach Creek Drainage Improvements: This project is a series of pipe upgrades and retention facilities to accommodate the recommendations in the Stormwater Drainage Master Plan. Along with these upgrades, water quality enhancements are also needed.

Schedule & Completion Date: Continue to implement the Stormwater Master Plan.

Measurable Goal: Report annually any capital expenditures for stormwater improvements.

Responsible Party: The City of Ashland - Public Works Director.

7.10 Employee Training on O&M Implementation

[Regional Guide—Section 7.3.7]

Once the above items are completed, Ashland will train municipal city staff on operation and maintenance procedures as described in the O&M Manual. The staff training will occur in combination with training for Illicit Discharge and spill plan. Training will be general for all municipal employees and more specific training will be included for specific program areas. “Refresher” training will update staff on changes to the procedures as needed.

Schedule & Completion Date: The training of staff will begin in year three with refresher courses and courses for new staff conducted annually.

Measurable Goal: The number of hours spent in training, along with subjects, will be documented and reported annually.

Responsible Party: The City of Ashland - Public Works Director.

8.0 EVALUATION AND ASSESSMENT

In preparation for the annual reporting requirements, the City of Ashland will document program implementation and progress. The Measurable Goals listed in this Program are initial goals. The City is working towards meeting those requirements for the Phase II permit that are not currently being implemented. The Measurable Goals in this Program reflect the implementation schedule of each of the BMPs. Once the BMP has been implemented, the City will revise the Measurable Goal for that requirement to track the progress of implementation, effectiveness, or environmental improvement as appropriate.