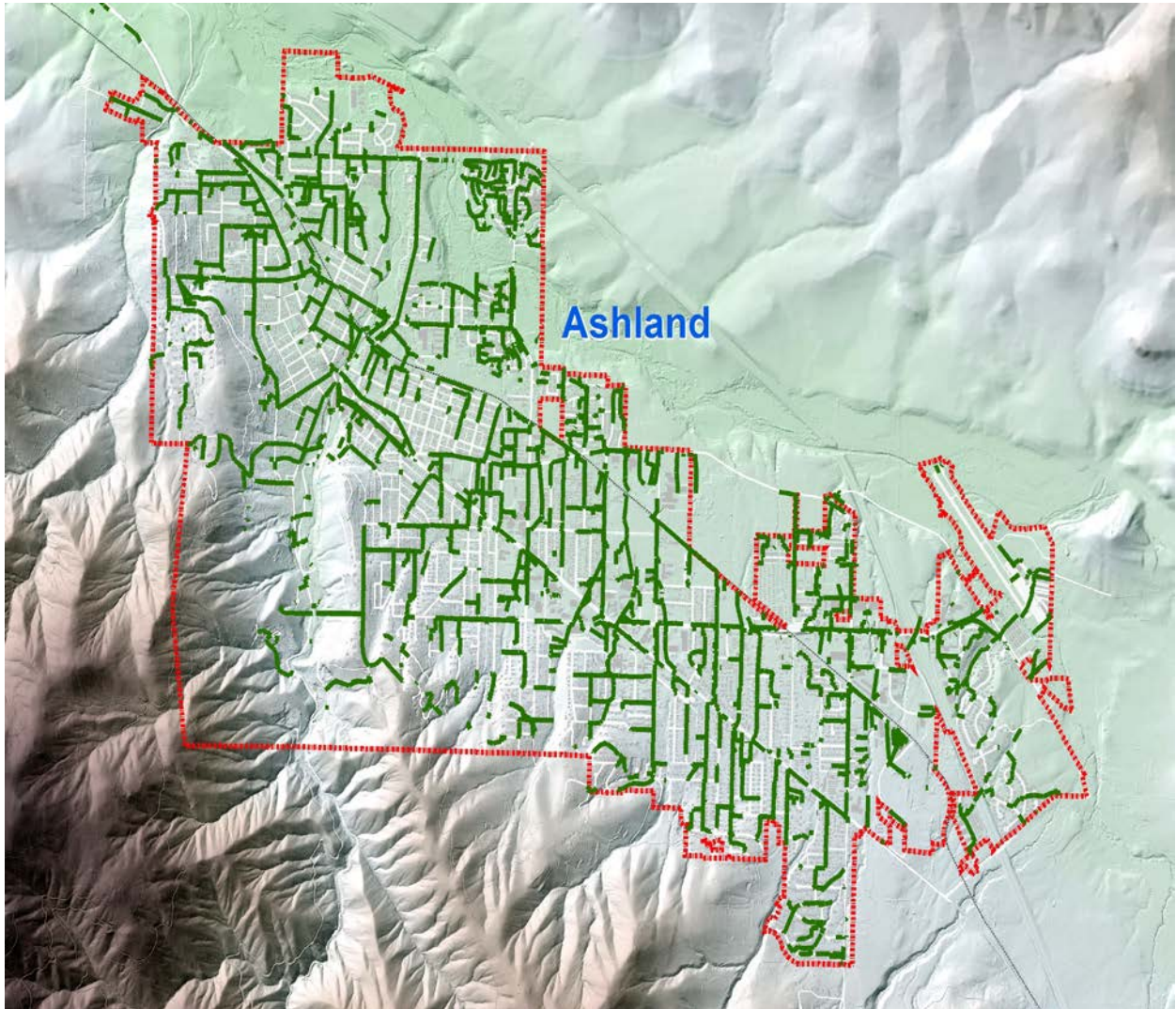


ASHLAND

Storm Water Management Plan



2019 - 2024

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Table 2	Attached

**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, Josephine County, Medford, Grants Pass, Eagle Point, Rogue River, Phoenix, Talent and Rogue Valley Sewer Services.

This SWMP is arranged by the six program measures defined within the NPDES Phase II General Permit issued to the City of Ashland. At the beginning of each section is a summary table listing each proposed activity associated with the measures 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 permit 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, schedules, measurable goals, responsible parties, and other implementation issues for each activity.

2.0 PUBLIC EDUCATION AND OUTREACH

Ashland participates in a regional program for education and outreach.

The following presents the requirements for the program, how they are being achieved, and the implementation schedule.

Implementation Date: February 28,2020

PUBLIC EDUCATION AND OUTREACH							
BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Education and outreach	Yes	Continuous					
Stormwater education activities	Yes	Yes					
Target audiences and topics	Yes	Partial					
Education on construction site control measures	Yes	Yes					
Tracking and assessment	No	Continuous					

2.1 Education and outreach

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

Schedule & Completion Date: This activity is continuous and ongoing.

Measurable Goal: Continual participation in the regional efforts for education and outreach through SWAT and Stream Smart

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

2.2 Stormwater education activities

The permit registrant will distribute or offer at least two (2) educational messages or activities per year, target specific audiences, and topics as listed in the permit, summarized below from pages 12 and 13 of the General Permit (Schedule A.3.a.iii-vi), and outlined in Tables 2. Table 2 also contains information on activities that are existing or need to be developed and indicates opportunities to collaborate regionally

All stormwater education and outreach in the Rogue basin may utilize the Stream Smart communications campaign including logo, brand materials, and communication channels including website and social media when communicating about reducing pollutants in stormwater runoff.

Schedule & Completion Date: Implementation by February 28,2020.

Measurable Goal: The implementation date was met. Program is continuous and ongoing.

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

2.3 Target audiences and topics

1. General public, homeowners, homeowners associations, schoolchildren, and businesses (including home-based and mobile businesses) targeted at least once (1) during permit term.
2. Local elected officials, land use planners and engineers: targeted at least once (1) during permit term
3. Construction site operators: targeted at least twice (2) during permit term

Target topics

- Impacts of illicit discharges on receiving waters and how to report them.
- Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts.
- Best management practices for proper use, application and storage of pesticides and fertilizers.
- Best management practices for litter and trash control.
- Best management practices for recycling programs.
- Best management practices for power washing, carpet cleaning and auto repair and maintenance.
- Low-impact development/green infrastructure.
- Septic systems, information pertaining to maintenance of septic systems.
- Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife.
- Stormwater issues of significance identified by permit registrant

Educational messages or activities:

- Electronic materials
- Printed materials
- Mass Media
- Targeted workshops
- Other educational events or formats – trainings, participating in events, organizing community events

MS4s may use existing materials or may utilize materials developed in cooperation with other MS4s or may develop its own educational materials and means of delivering its message(s). When applicable, the

permit registrant must consider delivering its selected messages and/or activities in language(s) other than English.

Outreach to the general public, homeowners, homeowners associations, schoolchildren, and businesses (including home-based and mobile businesses)- MS4s will educate residents on ways to reduce the behaviors and practices that cause or contribute to adverse stormwater impacts on receiving waters and provide steps that citizens, businesses, and others can take to reduce pollutants in stormwater runoff and prevent illicit discharge from entering the MS4 impacted receiving waters.

Outreach to local elected officials, land use planners and engineers - MS4s will communicate about the MS4 Phase II Program within their own organizations to establish and build relationships with staff and elected officials so those individuals can relay information to land use planners and engineers that they may come in contact with. By having a shared understanding within their own organizations and sharing that with professionals in the development profession, they will demonstrate that they are active implementers of the permit and stand behind its objectives.

Schedule & Completion Date: Implementation by February 28,2020.

Measurable Goal: The implementation date was met. Program will be continuous and ongoing

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

2.4 Education on construction site control measures

Outreach to Construction Site Operators – At least twice during permit term, permit registrant will conduct educational outreach to target construction site operators about construction site control measures. Topics should include BMPs, appropriate selection, design, installation, use and maintenance of construction site control measures.

Schedule & Completion Date: Implementation by February 28,2020.

Measurable Goal: The implementation date was met. Program will be continuous and ongoing

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

2.5 Tracking and assessment

Tracking and Assessment – The permit registrant must track implementation of the Public Education and Outreach requirements. In an Annual Report, the permit registrant must assess their progress toward implementation of the program, including the evaluation of at least one education and outreach activity taking place during the reporting timeframe for the Annual Report.

Schedule & Completion Date: Implementation by February 28,2020.

Measurable Goal: The implementation date was met. Program will be continuous and ongoing

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

3.0 PUBLIC INVOLVEMENT AND PARTICIPATION

Implement a public involvement and participation program that provides opportunities for the public to participate in the development of the SWMP control measures. MS4s must comply with their own public notice requirements when implementing a public involvement participation process.

As a part of Public Involvement and Participation, the Stormwater Advisory Team (SWAT) will continue to meet quarterly and each permit registrant will actively invite participation from entities and individuals who may have interest in stormwater pollution prevention in the region. The goal of inviting non-permitted entities to the SWAT meetings is to increase public involvement in developing, reviewing, and implementing the SWMP.

Implementation Date: February 28,2020

PUBLIC INVOLVEMENT AND PARTICIPATION							
BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Publicly accessible website	No	Continuous					
Stewardship opportunity	Yes	Yes					
Tracking and assessment	No	Continuous					

3.1 Publicly accessible website

The MS4s will maintain and promote at least one publicly accessible website with information on the permit registrant’s SWMP implementation, including the SWMP Document, contact information, and educational materials. This website may be that of the individual permit registrant or this information may be posted jointly on the Stream Smart website. Any website will be maintained with current information and be updated at least annually. The City of Ashland will maintain their stormwater page on the city webpage and use the joint Stream Smart website for this purpose.

The websites will incorporate the following:

- Illicit Discharge Complaint or Report requirements (see Schedule A.3.c.v of permit).
- Draft documents issued for public comment, and final reports, plans and other official SWMP policy documents.

- Links to all ordinances, policies and/or guidance documents related to the construction and post-construction stormwater management control programs, including education, training, licensing, and permitting.
- The permit registrant’s contact information for relevant staff, including phone numbers, mailing addresses, and email addresses.

Schedule & Completion Date: Implementation by February 28,2020.

Measurable Goal: The implementation date was met. Program will be continuous and ongoing

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

3.2 Stewardship opportunity

Each MS4 will, at a minimum, create or partner in the development of one stewardship opportunity during the permit term. Possible stewardship opportunities include the following:

- Stream team activities,
- Storm drain marking,
- Volunteer monitoring,
- Riparian plantings/facility enhancement,
- Neighborhood low-impact development activities,
- Adopt-A-Road,
- Citizen advisory committee.

Other locally relevant opportunities could also be appropriate.

Schedule & Completion Date: Implementation by February 28,2020.

Measurable Goal: The implementation date was met. Program will be continuous and ongoing.

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

3.3 Tracking and assessment

The permit registrants will track implementation of the public involvement and participation requirements. The permit registrants will assess their progress towards implementation of the program in an Annual Report. The tracking, assessment, and reporting may be performed and published jointly or independently.



4.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

An Illicit Discharge Detection and Elimination Program has been developed for the City of Ashland. The following presents the requirements for the program, how they are being achieved and the implementation schedule.

In addition to the following required best management practices (BMPs), brochures, including information about illicit discharges have been created for the general public as a part of the Public Education requirements (section 2).

Implementation Date: February 28, 2022

ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM							
BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
MS4 map	No	Completed					
Ordinance and/or other regulatory mechanisms	No	Yes					
Enforcement procedures	No	Partial					
Program to detect and eliminate illicit discharges	No	Yes					
Dry weather screening	No	Partial					
IDDE training and education	Yes	Partial					
Tracking and assessment	No	No					

 Activity scheduled for permit year
 No activity scheduled for permit year

4.1 MS4 map

Ashland has a dedicated GIS team that reviews and updates the mapping and asset management systems used to comply with the requirements of this section. The storm system map will also be updated as a part of the Illicit Discharge Detection and Elimination activities, and the Post-Construction program activities. Included in the inventory of assets are outfall and stormwater control locations. As new development is permitted and completed, the new system assets will be added to the base map.

Schedule & Completion Date: Ashland already has a current system map and it will be updates as required when new infrastructure is added to the system.

Measurable Goal: The storm system map will be updated as necessary.

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

4.2 Ordinance and/or other regulatory mechanisms

Ashland has just completed a comprehensive Storm Water and Drainage Master Plan. As part of this planning process Ashland has performed a review of its current ordinances and is preparing updates that will comply with section A.3.c.iii. of the MS4 phase II general permit to propose updated municipal code language to the Ashland City Council for approval and adoption meeting permit requirements.

Schedule & Completion Date: Implementation by February 28,2022.

Measurable Goal: Proposal draft and final language through a formal adoption process to the Ashland City Council in 2021/22 prior to the implementation deadline.

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

4.3 Enforcement procedures

New stormwater ordinances discussed under Section 4.2 will provide Ashland with regulations to remove illicit discharges if detected and include a written procedure for enforcement that will satisfy the requirement of this section.

Schedule & Completion Date: Proposal to Ashland City Council within 2021.

Measurable Goal: Proposal draft and final language through a formal adoption process to the Ashland City Council in 2021/22 prior to the implementation deadline.

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

4.4 Program to detect and eliminate illicit discharges

Complaint reporting and tracking has been made digital and included into the asset management program as well as the Ashland web-site stormwater page.

Schedule & Completion Date: This project has no completion date.

Measurable Goal: Continue program plan, evaluate, and update as needed.

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

4.5 Dry weather screening

Ashland has developed and implemented a dry weather screening program that was integrated into the maintenance activities outlined in section 7 of this manual.

Ashland Staff currently inspect outfalls and the drainage system to determine if they are functioning as designed. Staff will also inspect for dry weather flow and other items indicating potential illicit discharges.

Schedule: Continuous and ongoing.

Measurable Goal: Define and incorporate procedures and training for field screening, analysis, pollutant parameter action plan, and laboratory analysis procedures. Utilize and Maintain information and tracking in the City's asset management system.

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

4.6 Illicit discharge detection and elimination training and education

Ashland will ensure that staff responsible for performing this activity or performing inspections are trained or otherwise qualified to conduct such activities.

Schedule: Continuous and ongoing.

Measurable Goal: The number of hours spent in training, along with subjects and attendees, will be documented. Utilize and Maintain information and tracking in the City's asset management system.

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

4.7 Tracking and assessment

Ashland will continue to track program requirements and activities to ensure permit compliance.

Schedule & Completion Date: Continuous and ongoing.

Measurable Goal: Update program as needed.

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



5.0 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

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 for City Council approval.

The following presents the requirements for the program, how they are being achieved, and the implementation schedule.

Implementation Date: February 28,2023

CONSTRUCTION SITE STORMWATER RUNOFF CONTROL							
BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Ordinance and/or other regulatory mechanism	No	Partial					
Compliance with other NPDES permits	No	Yes					
Erosion and sediment control plans	No	Yes					
Erosion and sediment control plan review	No	Yes					
Construction site inspections	No	Yes					
Enforcement procedures	No	Yes					
Construction runoff control training and education	Yes	Yes					
Tracking and assessment	Yes	Yes					

 Activity scheduled for permit year
 No activity scheduled for permit year

5.1 Ordinance and/or other regulatory mechanism

Ashland has completed a comprehensive Storm Water and Drainage Master Plan that reviewed the City’s current municipal code ordinances. Updated municipal code ordinances will be presented to the Ashland City council for approval prior to the permitted implementation date. Currently a combination of the Rogue Valley Stormwater Quality Design Manual (section 2.1) and the City of Ashland Engineering Design Standards for Public Improvements (section 4.04) manual are recognized for the compliance of the requirements of this section.

Schedule & Completion Date: Full implementation by February 28,2023.

Measurable Goal: Proposal draft and final language through a formal adoption process to the Ashland City Council in 2021/22 prior to implementation deadline.

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

5.2 Compliance with other NPDES permits

Ashland currently requires full compliance with this requirement through the same manual sections listed in 5.1 above.

Schedule & Completion Date: Completed.

Measurable Goal: No new goals for this section.

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

5.3 Erosion and sediment control plans

Ashland currently requires submittal of erosion and sediment control plans for review and acceptance in the Ashland Engineering Design Standards Manual section 2.06 (design standards) and section 4.04 (construction).

Schedule & Completion Date: Review and update as needed for compliance with the MS4 phase 2 general permit.

Measurable Goal: Completion of updates by February 28, 2023.

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

5.4 Erosion and sediment control plan review

Ashland currently requires submittal of erosion and sediment control plans by an industry professional for review and acceptance in the Ashland Engineering Design Standards Manual section 2.06 (design standards) and section 4.04 (construction). Ashland also requires applicants to provide proof of appropriate permitting prior to approvals.

Schedule & Completion Date: Review and update as needed for compliance with the MS4 phase II general permit.

Measurable Goal: Completion of updates by February 28, 2023.

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

5.5 Construction site inspections

All construction sites which are required to submit site plans for erosion and sediment control will be inspected to ensure that the approved BMPs are installed and maintained correctly. Site plans must also reflect changes made on-site after the plans were accepted.

Schedule & Completion Date: Review and update as needed for compliance with the MS4 phase 2 general permit.

Measurable Goal: Completion of updates by February 28, 2023.

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

5.6 Enforcement procedures

Ashland will develop a written escalating enforcement and response procedure for all qualifying construction sites.

Schedule & Completion Date: February 28, 2023.

Measurable Goal: Review of current program in 2021.

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

5.7 Construction runoff control training and education

Ashland will continue to participate in the regional training for any and all staff responsible for performing inspections or review of ESCP.

Schedule & Completion Date: Continuous.

Measurable Goal: Current certification of employees responsible for this section.

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

5.8 Tracking and assessment

Ashland will update and track all program requirements for this section.

Schedule & Completion Date: Continuous.

Measurable Goal: Update and assessment completed in 2021.

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

6.0 POST-CONSTRUCTION STORMWATER MANAGEMENT PROGRAM



The City of Ashland Engineering design Standards for Public Improvement manual and current ordinances are currently being evaluated and updated for program requirements covered by this section.

Ashland participates with the regional Storm Water Advisory Team (SWAT) that has developed the Rogue Valley Stormwater Quality Design Manual. Ashland has adopted this manual as our means of compliance of this section.

The following presents the requirements for the program, how they are being achieved and the implementation schedule.

Implementation Date: February 28,2023.

POST-CONSTRUCTION SITE RUN-OFF FOR NEW DEVELOPMENT AND REDEVELOPMENT							
BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Ordinance and/or other regulatory mechanism	Yes	Partial					
Prioritization of Low Impact Development requirements	No	Completed					
Post-construction stormwater management requirements	Yes	Completed					
Post-construction site runoff plan review	No	Yes					
Long-term operations and mainainence	Yes	Partial					
Training and education	No	Yes					
Tracking and assessment	No	Yes					

 Activity scheduled for permit year
 No activity scheduled for permit year

6.1 Ordinance and/or other regulatory mechanism

The Rogue Valley Stormwater Quality Design Manual contains the requirements for design and BMP’s throughout all phases of design and construction for new or redeveloped infrastructure. Ashland has adopted this manual as the main regulatory document for compliance in this section of the permit

requirements until a full ordinance section review is completed and an update is approved by Ashland City Council.

Schedule & Completion Date: Full implementation by February 28,2023.

Measurable Goal: Full ordinance review performed by July 1,2021

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

6.2 Prioritization of Low Impact Development requirements

Ashland has performed an initial ordinance review for compliance of this section.

Schedule & Completion Date: Completed.

Measurable Goal: No new goals for this section.

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

6.3 Post-construction stormwater management requirements

Ashland has adopted the Rogue Valley Stormwater Quality Design Manual as the regulatory documentation for compliance with the requirements of this section until such time as new ordinances are adopted by Ashland City Council. This manual covers the requirements for A.3.e.iv.A-E. Ashland will continue to participate with the SWAT group to update the Rogue Valley Stormwater Quality Design Manual.

Schedule & Completion Date: Ongoing and continuous.

Measurable Goal: Work with the SWAT group to update the manual for permit compliance and post Ashland's requirements to the Ashland web-site stormwater page by February 28, 2023.

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

6.4 Post-construction site runoff plan review

Ashland will continue to follow the procedure and review process as stated in the Rogue Valley Stormwater Quality Design Manual.

Schedule & Completion Date: Ongoing and continuous.

Measurable Goal: Post the City of Ashland process and expectations to the Ashland website with a link to the Rogue Valley Stormwater Quality Design Manual.

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

6.5 Long-term operations and maintainence

The Rogue Valley Stormwater Quality Design Manual contains recommended schedules for long-term operation and maintainence. Ashland has adopted these schedules for compliance with portions of this section.

Ashland is developing inspection procedures for publicly and privately owned and maintained stormwater controls. The tracking mechanism will continue to be our asset management and mapping software. Inspection templets are being developed to comply with the tracking and reporting requirements of this section.

Schedule & Completion Date: Full implementation by February 28,2023.

Measurable Goal: Post finished inspection procedures and requirements on the City of Ashland web-site stormwater page.

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

6.6 Training and education

Ashland will ensure that staff responsible for performing activities or evaluating compliance with the requirements of this section are trained or otherwise qualified to conduct such activities.

Schedule & Completion Date: Annual and continuous.

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

6.7 Tracking and Assessment

Ashland will maintain records for all activities to meet the requirements of this section within the City's asset management system for annual reporting.

Schedule & Completion Date: Full implementation by February 28,2023.

Measurable Goal: No new goals for this section.



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

7.0 POLLUTION PREVENTION IN MUNICIPAL OPERATIONS

Ashland will review and update the operations and maintenance strategy plan. The following presents the requirements for the strategy plan and how they are being achieved.

Implementation Date: February 28,2022.

POLLUTION PREVENTION IN MUNICIPAL OPERATIONS PROGRAM							
BMP Activity / Description	Regional Activity?	Current Activity?	Permit Year				
			1	2	3	4	5
Operations and Maintenance strategy for existing controls	No	Yes					
Inspection and cleaning of catch basins	No	Yes					
Pollution prevention in facilities and operations	No	Yes					
Registrant-owned industrial stormwater permit facilities	No	Complete					
Requirements for pesticide and fertilizer applications	No	Yes					
Litter control	No	Yes					
Material disposal	No	Yes					
Stormwater infrastructure staff training	Yes	Yes					
Tracking and assessment	No	Yes					

 Activity scheduled for permit year
 No activity scheduled for permit year

7.1 Operation and Maintenance strategy for existing controls

Ashland will review and update existing municipal O&M activities and document the activities in an O&M strategy plan that will address municipal activities. The O&M strategy plan shall include the following:

- Documentation of legal authority allowing the City to inspect and require effective O&M of storm water controls owned and operated by another entity.
- Inspection schedule and procedures.
- Documenting and tracking inspections including enforcement actions and compliance responses.
- Reporting requirements for privately owned stormwater controls.

Schedule & Completion Date: Update O&M plan and implement by February 28, 2022.

Measurable Goal: Full review completed in 2021.

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

7.2 Inspection and cleaning of catch basins

Ashland will review and update as necessary its municipal O&M procedures for inspection and maintenance schedules.

Schedule & Completion Date: Ashland will review and update the O&M schedules for activities listed in this section by February 28, 2022.

Measurable Goal: Implementation of updated schedules by completion date.

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

7.3 Pollution prevention in facilities and operations

Ashland will review and update the current program for compliance with section A.F.iv.a-n.

Schedule & Completion Date: Update completed by February 28, 2022.

Measurable Goal: Review complete in 2021.

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

7.4 Registrant-owned industrial stormwater permit facilities

Requirements of this section are currently being met. Ashland will review program requirements annually.

Schedule & Completion Date: Ashland will continue to review and update as necessary.

Measurable Goal: No new goals for this section.

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

7.5 Requirements for pesticide and fertilizer applications

Ashland will review and update procedures to continue to comply with this section of the MS4 permit.

Schedule & Completion Date: Update O&M plan and implement the plan by February 28, 2022.

Measurable Goal: no measurable goal for this section.

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

7.6 Liter control

Ashland currently utilizes city maintained trash receptacles around heavy pedestrian traveled areas of the downtown area. Ashland work crews participate in and verify cleanup of permitted large public events.

Schedule & Completion Date: Ashland will continue using current management procedures.

Measurable Goal: Include program and requirements in written materials used as regulatory mechanism.

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

7.7 Materials disposal

Ashland will review and update as necessary the management procedure of all collected screenings, grit, solids, sludges, filter backwash water, decant water, and any other pollutant removed in the process of its maintenance activities.

Schedule & Completion Date: Ashland will continue using current management procedures.

Measurable Goal: No new measurable goals for this section.

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

7.8 Stormwater infrastructure staff training

Ashland will ensure that staff responsible for performing O&M activities or evaluating compliance with long-term requirements or ensuring pollution prevention at facilities and during operations are trained or otherwise qualified to conduct such activities.

Schedule & Completion Date: continuous and ongoing.

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

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

7.9 Tracking and Assessment

Ashland will maintain records for activities to meet requirements of the Pollution Prevention and Good Housekeeping for Municipal Operations program requirements and include a descriptive summary of its activities in the corresponding annual report.

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.

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.

9.0 APPENDIX

See attachment