



City of Eugene, Oregon

Stormwater Management Program

November 2023

for National Pollutant Discharge Elimination System Municipal Separate Storm Sewer Renewal

Phase 1 Individual Permit # 101244



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Section 1.

Introduction

On September 15, 2021, DEQ issued the City's fourth iteration of a National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer system (MS4) permit for stormwater discharges from the City's municipal stormwater system to waters of the state. Previous iterations of the "MS4 permit" were issued to the City in 1994, 2004, and 2010. The new permit requires the City to continue to implement a comprehensive stormwater management program to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP), protect water quality, and satisfy certain water quality requirements of the federal Clean Water Act.

Over the years since the first MS4 permit was issued in 1994 the City has implemented and adaptively managed its stormwater program to improve efficiency and effectiveness and to respond to changes in technology, scientific understanding of stormwater pollution and best management practices, and to meet updated regulations. The City conducts regular water quality monitoring in Amazon Creek and the Willamette River and long-term data trends show positive improvement in local water quality, indicating that what the City and community are doing to protect and improve water quality is having a positive impact. The federal Clean Water Act recognizes that stormwater discharges are highly variable in nature and difficult to control due to topography, land use, and weather differences (e.g., intensity and duration of storms). The goal of each iteration of the MS4 permit is a net reduction in pollutant loadings over the permit term.

Over the next five-year permit term, through September 2026, the City will continue to implement and enhance a range of stormwater best management practices to minimize pollution in stormwater runoff to and from the municipal stormwater system, including from existing and new residential, commercial, and industrial developments and City-owned and operated facilities. This document, the City's updated Stormwater Management Plan, is comprised of some historical information about the City's MS4 permit, the watershed context for Eugene, an interpretation of the MEP standard for MS4 permits, a summary of City's legal authority to implement the program, and the set of 22 best management practices (BMPs) that comprise the City's stormwater program.

1.1 Purpose and Organization of Document

This document represents the City of Eugene's Proposed Stormwater Management Program Document (SWMP Document, herein referred to as the "SWMP") in response to the fourth iteration of MS4 Permit Number 101244 issued on September 15, 2021. The updated SWMP describes the set of BMPs implemented by the City that, in the collective, reduce the discharge of pollutants into and from the MS4. The SWMP defines how compliance with the new MS4 permit is achieved and is being submitted to DEQ in accordance with Schedule A.2.c. of City's MS4 permit.

Section 1 of this document includes background information about the City's MS4 permit (Sec 1.2), a description of the MS4 permit area (Sec 1.3), and an overview of Eugene's stormwater program including program structure and coordination, local adopted policy, legal authority to implement the program, and key partnerships with local agencies (Sec 1.4). **Section 2** includes background on the City's determination of "maximum extent practicable" and its approach to adaptive management that was formalized during the previous iteration of the permit. **Section 3** provides information about the Willamette Basin TMDLs and their relationship to the City's SWMP. **Section 4** summarizes proposed changes to the Stormwater Management Plan from the current DEQ-approved (December 2012) SWMP. **Section 5** includes the set of 22 BMPs that comprise the City's updated SWMP.

1.2 Permit Background

Stormwater runoff is generated from rain and snowmelt that flow over land including impervious surfaces such as streets, building rooftops, parking lots and driveways, and does not soak into the ground. As it runs over land, stormwater runoff picks up pollutants including dirt/sediment, fertilizers and pesticides, oils, heavy metals, and trash which then end up in our creeks, rivers, lakes, and coastal waters. These pollutants pose a threat to public health and welfare, aquatic life, and the environment. The basic structure for regulating discharges of pollutants into the waters of the United States in order to restore and maintain the chemical, physical and biological integrity of the nation's waters is the federal Clean Water Act. First passed in 1948 as the Federal Water Pollution Control Act, it has been restructured and amended several times since then. With this federal legislation Congress gave the Administration the legal tools necessary to make inroads into the problems of water pollution control, while continuing to recognize the primary rights and responsibilities of the States to prevent, reduce, and eliminate pollution.

In the early 1990s, the Clean Water Act required municipalities with populations greater than 100,000 to apply for and obtain an NPDES permit for their stormwater discharges. In Oregon, this permitting program was delegated to the Oregon Department of Environmental Quality (DEQ). DEQ directed six Oregon jurisdictions and associated co-permittees to apply for and obtain a NPDES MS4 permit. The City of Eugene was one of the six jurisdictions required to obtain a MS4 permit.

The City submitted Part 1 of its original MS4 permit application in May 1992, with the Oregon Department of Transportation as a co-permittee. Part 1 of the original permit application required review of the stormwater system including mapping, outfall inventories, stormwater monitoring, etc. The City submitted Part 2 of its application in May 1993. Part 2 of the application required the development of a Stormwater Management Plan, which included a number of best management practices (BMPs) to address specific sources of pollutants. The permit did not specify the number or type of BMPs to be implemented; rather the permit stated that BMPs should be implemented to reduce pollutant discharges to the maximum extent practicable (MEP). The City was issued its first MS4 permit in November 1994.

The City submitted a renewal application prior to the end of the original (1994) 5-year permit period and was issued its second iteration of a MS4 permit in March 2004. The City submitted a renewal application prior to the end of its second (2004) 5-year permit period and was issued the third iteration of a MS4 permit in December 2010. The City submitted a renewal application prior to the end of its third (2010) permit and was issued the fourth iteration of a MS4 permit in September 2021. The new permit became effective on October 1, 2021, and is scheduled to expire on September 30, 2026.

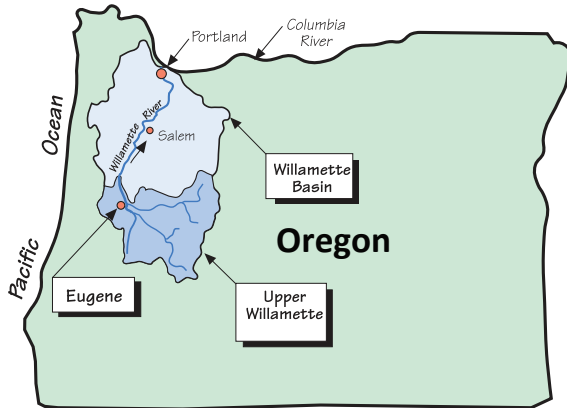
1.3 Description of Permit Area

The City of Eugene is a community of approximately 179,900 residents and, as shown on Figure 1-1, is located in the southern third of the Upper Willamette River watershed in Lane County, Oregon. The cities of Cottage Grove, Creswell, and Springfield are all located upstream of Eugene and runoff from Cottage Grove, Creswell, and South Springfield flows through Eugene via the Willamette River. The Willamette River runs through the City for about six miles, from approximately river mile 184 to river mile 178. Approximately 4,115 acres of west Springfield's drainage area discharges into the Q Street Floodway which flows into the Canoe Canal and through Eugene to the Willamette River.

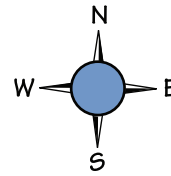
The City of Eugene is responsible for MS4 permit compliance within its city limits. The city limits, approximately 44 acres in area, are illustrated on Figure 1-2 in the context of the City's stormwater basins, urban growth boundary, and stormwater planning area which extends beyond city limits and

City of Eugene Urban Growth Boundary

Upper Willamette Drainage Basin Context Map



Drainage Basin Key



0 5 10 Miles
Scale

September 2022

Map prepared by JK Environments

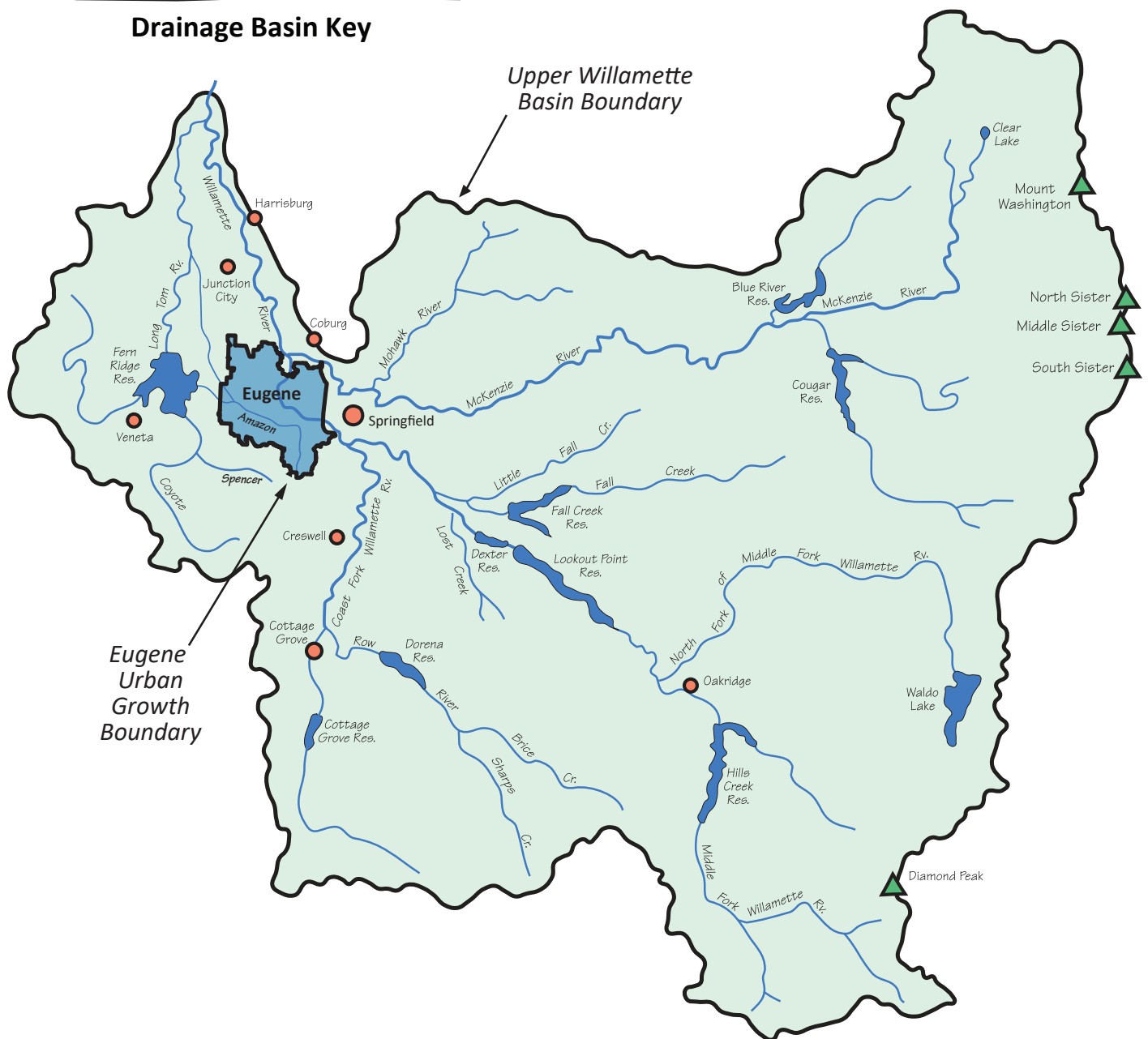
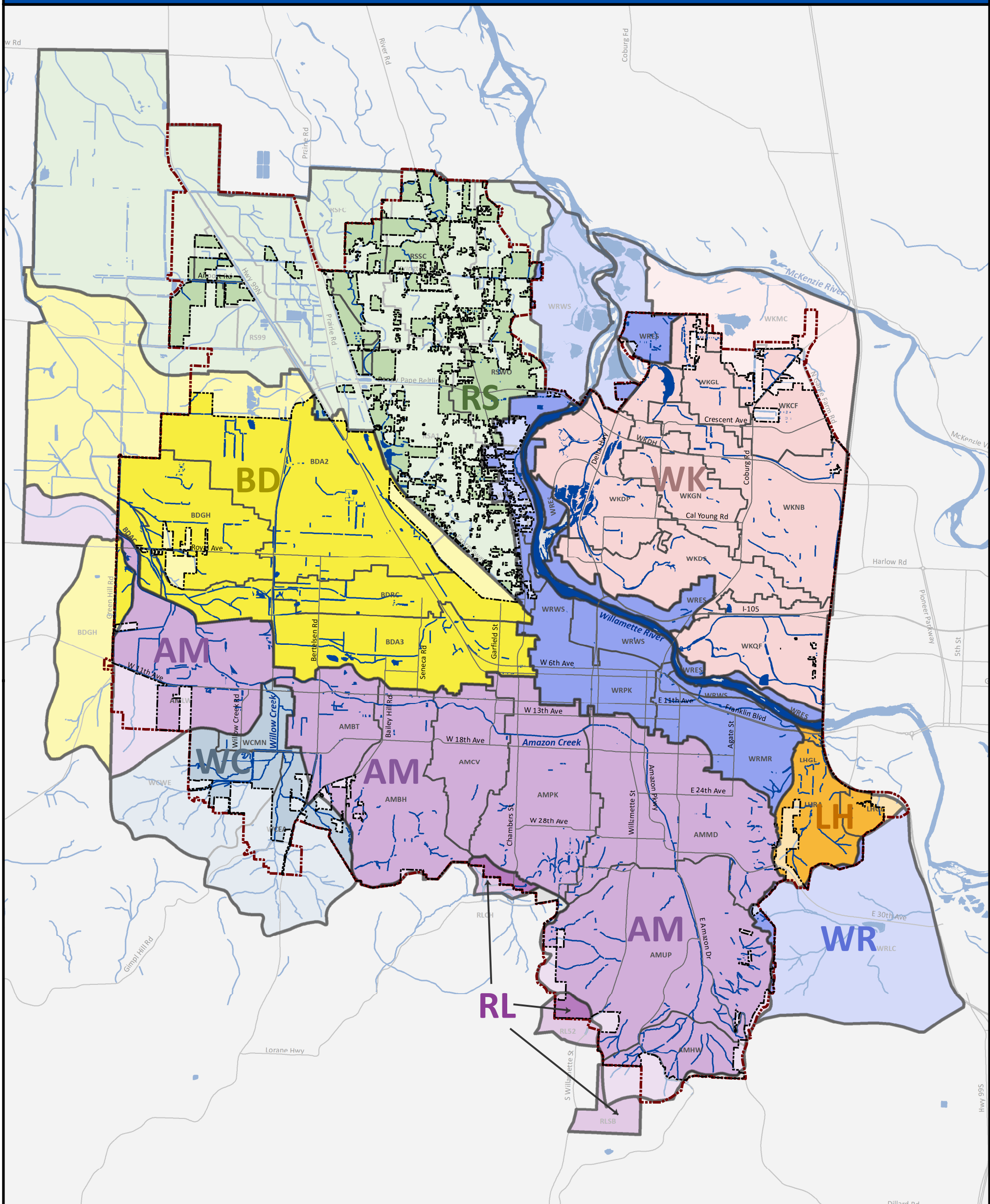


Figure 1-1

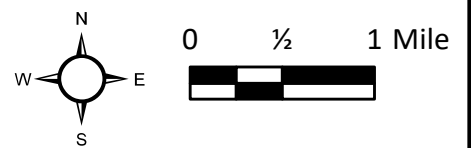
City of Eugene Stormwater Basins



Basin Boundaries

RS - River Rd-Santa Clara	AM - Amazon
WR - Willamette River	WC - Willow Creek
WK - Willakenzie	LH - Laurel Hill
BD - Bethel-Danebo	RL - Ridgeline

Open Waterways
Rivers and Ponds
Sub-basin Boundaries
Eugene City Limits
Eugene UGB



City of Eugene
Mapping and Data Team
September 2022



Figure 1-2

in some cases, beyond the urban growth boundary. With the exception of relatively small catchment areas (1-2 acres each) that drain to about 100 drywells (and are regulated under a Safe Drinking Water Act permit), Eugene’s stormwater runoff flows through the public stormwater system to the Willamette River, either relatively directly via direct outfalls and tributaries including Spring Creek, Flat Creek and the McKenzie River, or indirectly via the Amazon Creek/Long Tom River system. Eugene’s public stormwater system, illustrated in Appendix B (and, in more detail, via “EUG Maps” and the City’s [Mapping and Data Hub](#)) is comprised of inlets, pipes, outfalls, stormwater treatment facilities, ditches, and open waterways that Eugene is responsible for operating and maintaining.

1.4 Eugene’s Stormwater Program

The City’s Public Works Department has primary responsibility for implementing the Stormwater Management Program. Other departments are involved in implementation of the SWMP, including the Planning & Development Department, which is the lead department on two of the SWMP BMPs and provides strong assistance on two additional BMPs. Stormwater program-area responsibilities are summarized in Table 1-1. Public Works staff coordinates with other City departments (e.g., Fire, Central Services, and Library, Recreation, and Cultural Services), and other local agencies (e.g., Lane County, City of Springfield, Eugene Water and Electric Board) to implement the program.

Table 1-1. General Areas of Responsibility for Stormwater Program

Public Works Administration Division	• Program management • Financial management • Stormwater outreach and education, graphics
Public Works Engineering Division	• NPDES MS4 permit management • Stormwater development standards (post-construction for new and redevelopment) • Erosion prevention and construction site management • Capital improvement projects and long-term master planning • Storm system mapping & data management
Public Works Maintenance Division	• Illicit discharge detection/elimination and spill response • Street sweeping and leaf pick-up • City fleet vehicle maintenance • Public piped system maintenance • Winter road sanding and de-icing • Oversight of private underground facility maintenance
Public Works Parks & Open Space Division	• Open waterway and natural areas maintenance • Public vegetated stormwater facility maintenance • Litter, debris, and illegal camping in parkland • Educational volunteer program • Tree planting and establishment programs • Oversight of private vegetated facility maintenance • Integrated pest management on city-owned lands
Public Works Wastewater Division	• Water quality sampling and data analysis • Industrial stormwater program • Commercial facilities outreach and inspection
Planning and Development Department	• Recycling and solid waste management • Household hazardous waste • Strong assist including with stormwater development standards and erosion prevention

Coordination of the various activities occurs through routine staff and manager communication and via several program teams as shown in Table 1-2.

Table 1-2. Stormwater Program Policy, Management and Coordination Teams	
Stormwater Policy Team	Comprised of Public Works Director and Division Managers. Meets monthly. Provides policy direction for the stormwater program.
Stormwater Management Team	Comprised of stormwater program managers and lead staff. Meets monthly. Provides overall management for the Stormwater Program. Oversees development of new policy for approval by the Policy Team. Implements Policy Team direction. Includes subcommittees for specific objectives (e.g., Capital improvement project sub-committee).
Stormwater Operations Team	Comprised of stormwater program lead staff. Meets semi-annually. Shares information for on-going program coordination. Resource pool of key staff for specific tasks.
Stormwater Enforcement and Penalty Review Coordination Team	Comprised of stormwater lead staff for regulatory programs. Meets as needed. Coordinates across regulatory program areas (IDDE, erosion, industrial/commercial) on code compliance incidents. Shares information on enforcement actions. Reviews administrative civil penalties and makes determinations.

1.4.1 Stormwater Policy

In anticipation of the first iteration of the City’s MS4 permit, concerns over open waterway management practices, and the discovery of an extensive concentration of wetlands in west Eugene in the early 1990s, the Eugene City Council adopted the Comprehensive Stormwater Management Plan (CSWMP)¹, which continues to provide the policy framework for the City’s stormwater program to this day. Establishing clear policy enabled the City to address a variety of stormwater issues within a comprehensive management framework– to manage each of the program areas so that they are coordinated and consistent, meet the requirements of federal, state and local laws, meet the needs of the community, and meet multiple objectives. CSWMP laid the foundation for implementing a stormwater program that meets multiple objectives including flood control, water quality enhancement, natural resource protection, and recreation and educational opportunities. CSWMP is reviewed periodically to ensure that it is still relevant and represents the appropriate policy basis for Eugene’s stormwater program. While it continues to be deemed relevant and appropriate, some elements are now out of date and the City’s Stormwater Policy Team has prioritized updating CSWMP over the next several years.

1.4.2 Legal Authority

To effectively control pollutant discharges into and from the municipal stormwater system and enforce the provisions of the MS4 permit, the City is required to “... maintain adequate legal authority through ordinance(s), code(s), interagency agreement(s), contract(s) and/or other mechanisms...” The City maintains the necessary legal authority to implement and enforce the requirements of its MS4 permit through Eugene City Charter, Municipal Code, and Administrative Orders. A summary of stormwater-related provisions and authority is provided in Appendix A. The Eugene Code is available on the City’s web site: <https://eugene.municipal.codes/>. Specific Administrative Orders are referenced from individual program fact sheets in Section 5, and the full set of Administrative Orders is available upon request.

¹ [City of Eugene Comprehensive Stormwater Management Plan, November 1993](#)

ORS 190.110 grants authority to state and local governments to enter into cooperative agreements for the performance of any functions and activities that a party to the agreement, its officers, or agents have authority to perform. The City and Lane County have established two Intergovernmental agreements which have a relationship to the MS4 permit. One IGA (“Maintenance IGA”) assigns operational maintenance responsibilities on approximately 60 miles of roadway, generally located north and south of Beltline Highway, that are equally shared in an area of mixed city and county jurisdiction, including street sweeping, catch basin cleaning, and snow and ice removal. The second IGA (“Stormwater IGA”) is to support and partner with Lane County in implementing its stormwater program including in the areas of erosion prevention and construction site management, stormwater education and outreach, illicit discharge detection and elimination, volunteer activities, stormwater planning and special studies.

In addition, the City voluntarily coordinates with DEQ in implementing the construction activities permit program via a Memorandum of Agreement (MOA between Department of Environmental Quality and City of Eugene for Issuing Storm Water Permits for Construction Activities, 1997) and an Intergovernmental Agreement (IGA between DEQ and City of Eugene for Construction Activities Automatically Covered by NPDES 1200-C, 2011). The MOA has been in effect since 1997 and the IGA has been in effect since 2011 and both remain in effect until modified or terminated. Either the City or DEQ may terminate the MOA or IGA at any time upon a 30-day written notice.

The City also voluntarily coordinates with DEQ in administering NPDES 1200-Z and 1700-A General Permits via a Memorandum of Agreement (MOA between DEQ and City of Eugene for administration of NPDES 1200-Z and 1700-A General Permits, 2008). The MOA has been in effect since 2008 and remains in effect unless modified or terminated. Either the City or DEQ may terminate the MOA at any time upon a 30-day written notice.

1.4.3 Relationship to Other Local Jurisdictions

The United States Environmental Protection Agency (EPA) adopted rules to implement “Phase II” of the MS4 permitting program in December 1999. Phase II expanded the MS4 permitting program to include smaller communities located in United States census-defined urban areas. Locally, the City of Springfield and Lane County were issued their first NPDES MS4 Phase II individual permits in 2007. DEQ issued the second iteration of permits for smaller communities via the MS4 Phase II General Permit in November 2018 (subsequently modified March 2021), including for Springfield and Lane County. Figure 1-3, Local Watershed and MS4 Permit Areas Context Map, illustrates the respective MS4 Phase I and II permit boundaries for City of Eugene, City of Springfield, and Lane County, in a local watershed context. The map was developed by Lane County and subsequently updated by City of Eugene.

In April 2004, Lane County and the City of Eugene initiated an intergovernmental agreement (IGA) to collaborate on stormwater program activities in the urban transition area (UTA) which is the jurisdictional area outside of the Eugene city limits and within the Eugene urban growth boundary (UGB). Services are provided by the City to Lane County in the areas of stormwater education and outreach, erosion prevention, illicit discharge detection and elimination, and stormwater basin master planning. The City and County take a collaborative approach to the IGA services and, beyond the core services, have partnered on special projects including most recently a study on the potential sources of zinc in stormwater runoff. The Stormwater IGA has been updated periodically, with the most recent update effective January 1, 2022. The next update is scheduled for 2023, to reflect the City and County updated SWMPs.

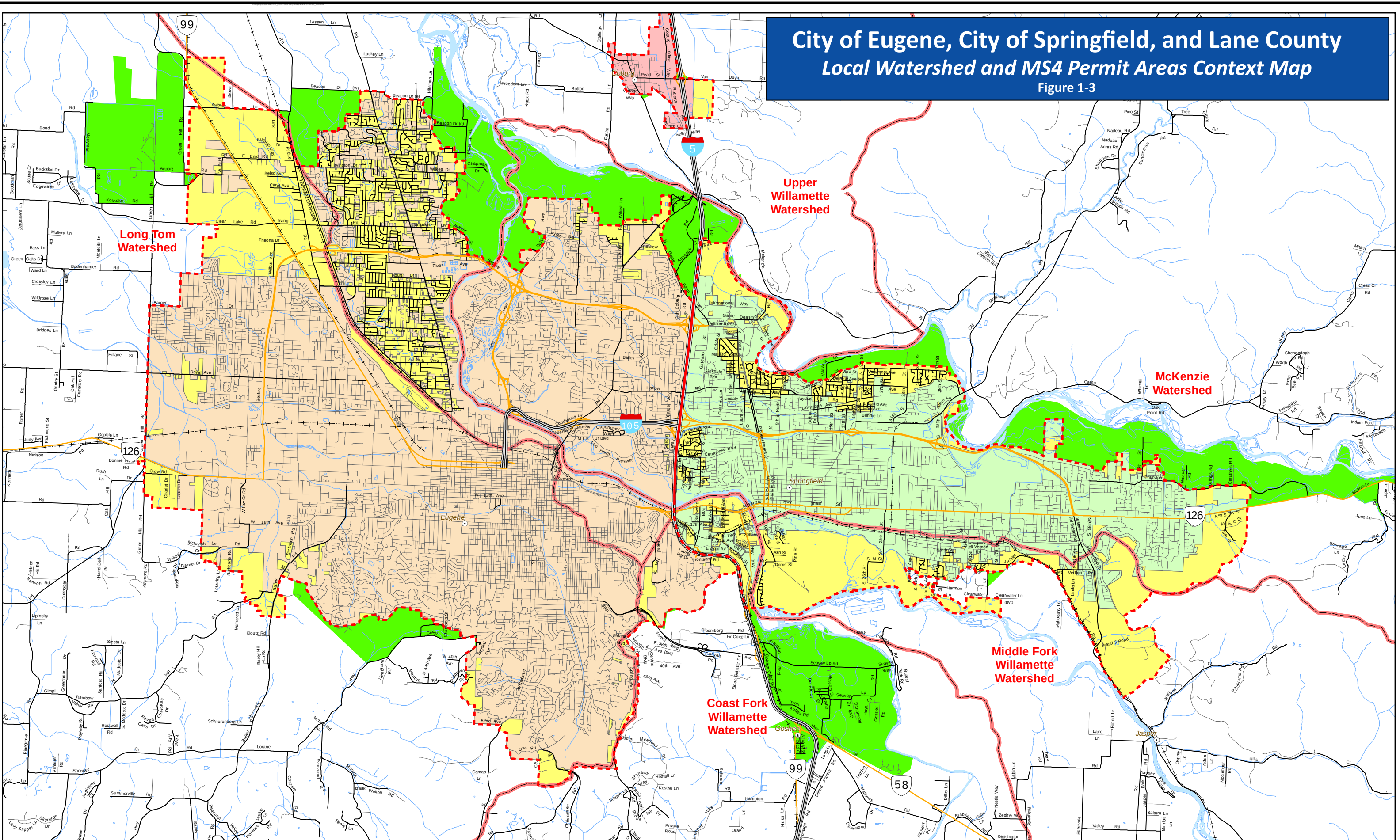
The City and Lane County have cooperated for many years on road maintenance activities including in the UTA, to increase efficiencies and safeguard public welfare. Operational maintenance

responsibilities are shared evenly between the two agencies on a total of approximately 60 miles of roadway. Activities include street sweeping, leaf pick up, snow and ice removal, winter sanding and de-icing, and storm system and catch basin cleaning. Since the number of roadway miles and responsibilities are shared equally (about 30 miles per agency), the Maintenance IGA is considered cost-neutral for the City and County. The Maintenance IGA was most recently updated in 2020 and is reviewed regularly for monitoring and amending as needed.

In addition to work completed under the Stormwater and Maintenance IGAs, the cities of Eugene and Springfield and Lane County actively participate in the Lane County Pollution Prevention Coalition and often collaborate on stormwater education activities such as identifying topics for Eugene's Stormwater Connections newsletter and developing educational materials for sector-specific businesses such as a best management practices for pressure washing brochure. Another metro-area coordination group, the Metro Clean Water Partners Team, meets quarterly to share information, identify and facilitate resolution of policy issues, and to identify issues and opportunities of consistency among metro area stormwater program activities.

City of Eugene, City of Springfield, and Lane County Local Watershed and MS4 Permit Areas Context Map

Figure 1-3



The information on this map was derived from digital databases on the Lane County regional geographic information system. Care was taken in the creation of this map, but is provided "as is". Lane County cannot accept any responsibility for errors, omissions or positional accuracy in the digital data or the underlying records. Current plan designation, zoning, etc., for specific parcels should be confirmed with the appropriate agency. There are no warranties, expressed or implied, accompanying this product. However, notification of any errors will be appreciated.

- | | | | |
|-------------------------------------|----------------------------|--------------------|-----------------------------|
| County NPDES MS4 Area, Outside UGBs | Springfield NPDES MS4 Area | Interstate Freeway | Other Road |
| County NPDES MS4 Area, Within UGBs | Watershed Boundary | State Highway | Railroad |
| Eugene NPDES MS4 Area | River/Stream | County Road | Eugene and Springfield UGBs |



Map produced by Lane County and updated by the City of Eugene (September 2022)

*NPDES MS4 stands for National Pollutant Discharge Elimination System Municipal Separate Storm Sewer System. This area is set by the Oregon Department of Environmental Quality based on the US Census.

Section 2

Maximum Extent Practicable and Adaptive Management

Schedule A.1 of the City's 2021 MS4 permit requires Eugene to "continue to implement, adaptively manage, and enforce the SWMP designed to reduce pollutants from the MS4 to the maximum extent practicable (MEP)" and further states that "Compliance with this permit and implementation of the DEQ-approved SWMP Document, in accordance with Schedule A.2, establishes the MEP requirement." The DEQ-approved SWMP is the primary mechanism to achieve the MEP standard. Permit Schedule A.2.f allows for modification of the SWMP and states that "The permittee must continue to follow an adaptive management approach developed under the previous permit iteration in order to assess and modify, as necessary, any or all existing SWMP components and adopt new or revised SWMP components to achieve reductions in stormwater pollutants to the MEP."

The City's adaptive management process was developed under the previous permit iteration and formalized and documented beginning with the City's 2011 Stormwater Annual Report. The adaptive management process outlines the approach for assessing and modifying the SWMP to achieve reductions in stormwater pollution to the MEP and is divided into two distinct processes: an annual adaptive management process and a permit cycle adaptive management process as described in the following sections.

2.1 Annual Adaptive Management Process

Following guidance in DEQ's third iteration (2010) Permit and Permit Evaluation Report for the City's MS4 permit, the annual adaptive management process involves an operational cycle for assessing BMPs, including the steps of: 1) BMP implementation, 2) data collection, 3) assessment, 4) identifying needs, and 5) BMP modification.

Tracking measures are identified for each of the BMPs to assess progress toward achieving measurable goals outlined in the SWMP. Data collected during implementation of BMPs will be consistent with documented tracking measures (e.g., miles of streets swept, number of catch basins cleaned, etc.) and will allow for the assessment of BMP measurable goal attainment. Data collected as part of the Monitoring Plan will also be reviewed and utilized, as applicable, during the assessment phase of the adaptive management process (e.g., identification of data anomalies, water quality standards exceedances, and water quality trends).

The assessment of BMPs will occur annually during preparation of the City's stormwater annual report, to be submitted to DEQ by December 1 of each permit year. Among other reporting requirements, the stormwater annual report must contain (Schedule B.3.a.) the following:

The status of implementing the stormwater management program and each SWMP program element, including progress in meeting the measurable goals and program tracking and assessment metrics identified in the SWMP as well as additional annual reporting requirements identified in each permit section.

By providing a summary in the stormwater annual report of progress toward attaining BMP measurable goals (through data collection and tracking measures), the City: 1) meets the

aforementioned reporting requirement and 2) facilitates a critical step in adaptively managing its stormwater program by assessing each BMP.

While preparing the annual report, the City will collect data and feedback from staff responsible for implementing/reporting on each BMP to facilitate the BMP assessment process. Factors considered during the assessment phase are reflected in the Adaptive Management Evaluation Tool template provided in Appendix C. Key factors considered in the annual evaluation include but are not limited to:

- Was the BMP measurable goal attained? If not, describe circumstances why, and how progress will be made toward future attainment.
- For multi-year BMPs, were milestones or timelines met?
- Can we feasibly refine or improve the BMP to gain efficiency or effectiveness in removing stormwater pollutants?
- Are staffing/financial resources available to support such a BMP improvement or refinement?

In addition to assessing the implementation of each BMP, staff will weigh resource availability and needs related to the overall stormwater program, including consideration of budget/funding, training needs, new technology, or available equipment.

The assessment phase will inform any alterations to the stormwater program or modifications to the SWMP. A summary of the adaptive management process including any proposed revisions to the SWMP will be included in the City's annual stormwater reports and follow the requirements of Schedule A.2.f. and B.3.b. of the MS4 permit.

After implementing modifications, the annual adaptive management process will continue to include an assessment of whether the modifications are resulting in the predicted outcomes/efficiencies through an iterative feedback loop. Annual adaptive management will, therefore, ultimately contribute to the City's SWMP updates required by Schedule B.4 of the NPDES MS4 permit for the permit renewal application package, including the modification, addition, and removal of BMPs.

2.2 Permit Cycle Adaptive Management Process

Results of the 2015 permit cycle adaptive management process were summarized in the December 2015 MS4 permit renewal submittal and included a comprehensive background on how MEP has been evaluated over time beginning with the first iteration of the City's MS4 permit in 1994 and as the City's stormwater program evolved through adaptive management up to and including the 2015 submittal. Following is a brief recap of the 2015 permit cycle adaptive management process and outcomes:

- MEP Evaluation Factors and Criteria - Phase I jurisdictions coordinated to standardize objective criteria related to the three MEP evaluation factors: program effectiveness, local applicability, and program resources. The collaborative process included identification of example criteria for consideration. Each jurisdiction scored and ranked the example criteria depending on deemed importance and applicability. Highest ranked criteria were deemed universally important and applicable by all participating jurisdictions and identified for use with the proposed SWMP revision process. Eugene evaluated its SWMP against these highest ranked criteria and concluded that its program met all the criteria.
- Review of all annual adaptive management evaluations over the permit term.

- Review of the SWMP BMP fact sheets - Program managers reviewed each BMP fact sheet to identify any out-of-date information, removed completed tasks, incorporated new tasks, and refined measurable goals and tracking measures.
- Review of long-term water quality trends - Program managers were presented with the results of the receiving streams water quality trends analyses (1997-2015) and considered the results in identifying potential changes to the SWMP.
- Review of evaluations/reports produced during the 2010-2015 permit term - Specific assessments required under the previous iteration of the MS4 permit were reviewed and considered in identifying potential changes to the SWMP including:
 - Public Education Effectiveness Evaluation – collaborative evaluation via Oregon ACWA of the effectiveness of public education activities
 - Hydromodification Assessment – examination of the potential causes of hydromodification in local waterways; current and potential future strategies/actions
 - Retrofit Plan – documentation of the City’s retrofit strategy for reducing water quality impacts from existing developed areas within the Eugene MS4 area.
 - Evaluation of 303(d) Listed Pollutants – assessment of the potential contribution from Eugene’s MS4 and evaluation of 303(d) pollutant reduction BMPs
 - TMDL Pollutant Load Reduction Evaluation - estimate of stormwater pollutant loads and pollutant load reductions for applicable TMDL parameters.
 - TMDL Wasteload Allocation Attainment Assessment – evaluation of the ability to attain TMDL wasteload allocations applicable to Eugene’s MS4.
- Consideration of public review and comments provided to the City on draft Stormwater Annual Reports and 2015 permit renewal submittal.

As a result of the 2015 permit cycle adaptive management process, changes were identified and incorporated into an updated draft SWMP. The updated draft SWMP was then evaluated against the standardized MEP criteria (i.e., specific criteria described in the first bullet above associated with program effectiveness, local applicability, and program resources criteria) and determined to meet the MEP requirement. The proposed 2015 was then submitted to DEQ for review and approval.

DEQ did not act upon the 2015 renewal submittals until 2021, and the 2012 SWMP remained in effect. Subsequent to receiving the 2021 MS4 permit the City conducted an evaluation of its program and identified and incorporated additional modifications that represent additional adaptive management updates for greater effectiveness, local applicability and in consideration of program resources, and enhancements to meet the new (fourth iteration) MS4 permit requirements. The updated SWMP is provided in Section 5. To help identify and explain the modifications, Section 4 provides a summary of changes by program area and BMP.

In preparation for the 2026 MS4 permit renewal application as required by Schedule B.4 of the permit, the City will assess each BMP described in its SWMP, its environmental monitoring program, environmental monitoring data, and results from the additional assessments or studies conducted in support of its MS4 permit compliance to evaluate the overall effectiveness of Eugene’s stormwater management program in reducing pollutants to the MEP.

BMP implementation data collected and evaluated over the course of the permit cycle, as well as historical data (if applicable), will be reviewed during preparation of the MS4 permit renewal package. This review will help determine BMP refinements and improvements that should be proposed as part of the program modifications at the end of the permit cycle. This process supports the examination of factors including but not limited to:

- Do we have information about new technology or other information to improve or refine existing BMPs, identify alternative BMPs, or include additional BMPs?
- Have we set the appropriate measurable goals for existing BMPs, or should they be changed?
- Are resources (funding, staff, equipment, etc.) available to change the BMP measurable goal, and does it make sense to change the goal?

Where applicable, the effectiveness of individual BMPs may also be evaluated by use of data collected through the City's environmental monitoring program. For example, pesticide monitoring data may be of use in identifying targeted outreach activities related to pesticide use, and possible refinement of appropriate outreach/education BMPs. Data collected through the environmental monitoring program will also contribute to the assessment of the overall stormwater management program.

In addition to BMP implementation data and environmental monitoring data analyses, specific deliverables in the MS4 permit will also facilitate the adaptive management process. Other required permit elements that will aid the SWMP evaluation include:

- Public involvement and participation (Schedule A.3.b.),
- Infrastructure retrofit and hydromodification assessment update (Schedule A.3.h),
- Updated 303(d) evaluation (Schedule D.2), and
- TMDL pollutant load reduction evaluation and establishment of TMDL pollutant reduction benchmarks for the next permit cycle (Schedule D.3.c. and d.).

Cumulatively, these deliverables will require the City to identify strategies to further reduce the impact of stormwater discharges on receiving water bodies. Some of these deliverables will also require identification of priorities for stormwater control facility implementation (i.e., the infrastructure retrofit and hydromodification assessment). Others will help identify opportunities for further refinement and improvement of its stormwater management program, particularly as related to 303(d) parameters and TMDL benchmarks. Objectives and strategies identified in these deliverables will be considered in context of existing BMPs and be used to revise appropriate BMPs (and associated measurable goals) during the 2026 MS4 permit renewal process. Finally, the City will utilize all the above-described analysis to evaluate the adequacy of the SWMP in reducing pollutants from the MS4 to the MEP.

Section 3

Total Maximum Daily Loads

Water quality standards ensure that beneficial uses of rivers and tributaries, such as water contact recreation, fish consumption, aquatic life, and fish rearing, are protected. The Willamette River and numerous tributaries do not meet several water quality standards including, variously, for bacteria, mercury, temperature, dissolved oxygen, and turbidity, as shown in Table 3-1. When water quality standards are not met, the Clean Water Act requires a Total Maximum Daily Load (TMDL) to be established. A TMDL determines how much pollution can be added to a waterbody without exceeding water quality standards and “allocates” that pollutant load to all discharges. The objective of a TMDL is to reduce pollution, meet water quality standards, and protect beneficial uses of waterbodies.

In 2006, DEQ issued, and EPA approved the Willamette Basin TMDL including for bacteria, temperature, dissolved oxygen, turbidity, and mercury. In 2021, the revised Willamette Basin Mercury TMDL was issued and approved. Along with other agencies in the Basin, the City of Eugene is considered a Designated Management Agency (DMA) because it has legal authority over sectors or sources contributing pollutants within its jurisdictional authority and because it operates a municipal stormwater system and wastewater treatment facility. As a DMA the City is responsible for implementing strategies to reduce TMDL pollutants per TMDL Water Quality Management Plans.

TMDL Plan rules require DMAs to identify strategies they will undertake to reduce TMDL pollutant contributions from within their jurisdictional authority. The City’s first TMDL Implementation Plan was approved in 2008 and updated every five years or as otherwise required. The City’s TMDL Plan is mainly focused on “nonpoint” sources of pollution (not covered by a discharge permit) and include strategies such as tree planting, waterway setbacks, and stream restoration projects. Under the TMDL program, stormwater discharges regulated under a MS4 permit are considered a “point” source of pollution and as such are regulated under the permit. The City’s MS4 permit states: “Compliance with the permit’s terms and conditions is presumed to be in compliance with TMDL Waste Load Allocations (WLAs)...” The SWMP in Section 5 of this document represents the City’s strategy to effectively address stormwater related TMDL pollutant reductions. More information about TMDLs is available on the City’s [TMDL web page](#).

Table 3-1. TMDL Waterbodies and Parameters Relevant to Eugene’s Jurisdiction	
Water body	Parameter
Upper Amazon Creek	Bacteria (E. coli)
A3 Channel	Bacteria (E. coli)
Fern Ridge Reservoir	Bacteria (E. coli)
	Turbidity (TSS surrogate)
	Biological oxygen demand
Amazon Diversion Channel	Volatile suspended solids (TSS surrogate)
	Nutrients (total phosphorus surrogate)
Upper Willamette River (main and unreferenced tributaries)	Bacteria (E. coli)
McKenzie River	Bacteria (E. coli)
Upper Willamette (basin-wide)	Mercury

Section 4

Proposed SWMP Changes

The City's proposed 2022 SWMP is comprised of a set of 22 best management practices (BMPs) designed to reduce the discharge of stormwater pollutants to the maximum extent practicable. As with the current (2012) SWMP, each BMP is identified by a letter and number, with the letter indicating which Division within the Public Works or Planning and Development Department has lead responsibility, combined with a sequential number assigned to the Division's set of BMPs, as follows:

A = Administration Division of Public Works Department

E = Engineering Division of Public Works Department

F = Finance and Administration Division of Planning and Development Department

M = Maintenance Division of Public Works Department

P = Parks and Open Space Division of Public Works Department

W = Wastewater Division of Public Works Department

For the 2022 SWMP, Eugene has re-categorized the BMPs to be in alignment with the 2021 MS4 permit Schedule A.3.a.-g. stormwater management program control measures, as follows:

- Public education and outreach
- Public involvement and participation
- Illicit discharge detection and elimination
- Construction site runoff control
- Post-construction site runoff for new development and redevelopment
- Pollution prevention and good housekeeping for municipal operations
- Industrial and commercial facilities
- Stormwater planning and capital improvements
- Mapping and data management
- Permit management

Tables 4-1 to 4-9 summarize the modifications reflected in the City's 2022 SWMP, by the new permit Schedule A.3 categories. Updates include changes to meet the 2021 permit requirements, administrative changes (BMP renumbering, renaming, combining BMPs), discontinuation of one BMP (previously P2: Bacteria Pilot Study) and the addition of a new BMP, program adaptive management updates (in the form of modifications to BMP/program descriptions, tasks, measurable goals, and tracking measures), and the addition of reference documents for more detailed program information.

Since Eugene's stormwater program was established on a solid foundation and adaptively managed over the years as described in Section 2 to the mature program that it is currently, it is in-line with other Phase I programs, and it reflects industry best practices, major changes were not necessary to meet the 2021 permit requirements and continue to reduce pollutants to the MEP. The updated SWMP reflects continuous adaptive management, in particular in the areas of low impact development and green infrastructure, emphasizing infiltration where suitable conditions exist, implementing public retrofit projects and promoting voluntary private retrofit projects, increasing tree canopy cover for all of their multiple benefits including stormwater benefits, and ensuring that public and private stormwater facilities are effectively and efficiently maintained and functioning well.

Table 4-1. Summary of Proposed SWMP Changes 2023

SWMP Section or BMP #/Title		Description of proposed changes (Nov '23)
BMP #	BMP title	
M1	Management of Illicit Discharges to the Municipal Stormwater System	In response to MS4 permit Schedule A.3.c.v, dry weather field screening locations have been updated. No changes have been made to the BMP M1 fact sheet itself; rather, changes have only been made to the document referenced from the fact sheet.
E2	Erosion Prevention and Construction Site Management Program	In response to MS4 permit Schedule A.3.d.v, erosion prevention program enforcement procedure documents have been updated for clarity. No changes have been made to the BMP fact sheet itself; rather, changes have only been made to the documents referenced from the fact sheet.
Sections 5.8.1 and 5.8.2	Section Titles: Industrial and Commercial Facilities Strategy and Industrial and Commercial BMPs	In response to MS4 permit Schedule A.3.g.ii, the Industrial/Commercial Facilities Strategy description and list of applicable BMPs have been updated.
W2 (NEW)	Commercial Facilities Outreach and Inspection	- In response to MS4 permit Schedule A.3.g.ii, a new BMP has been added (BMP W2 – Commercial Facilities Outreach and Inspection). - Added references to BMP W2 in Table 5-1 and Sections 5.2.2, 5.4.1, 5.5.1, 5.6.1, and 5.10.1.

Section 5

Stormwater Management Program Document

This City of Eugene Stormwater Management Program Document (herein referred to as the “SWMP”) describes the set of 22 best management practices that, in the collective, reduce pollutant discharges from the municipal stormwater system to the maximum extent practicable. This plan is a required element of the City’s National Pollutant Discharge Elimination System Municipal Separate Storm Sewer Discharge Permit #101244 re-issued September 15, 2021.

Section 5.1 includes an explanation of the SWMP BMP identification numbers, categorization, and MS4 permit schedule for reference. Section 5.2 through 5.11 include BMP fact sheets by category. Each fact sheet includes the responsible department and division, BMP description, key tasks, measurable goals, tracking measures, and references to related program documents and material.

5.1 SWMP BMP Identification and Categories

The City’s proposed SWMP includes 22 best management practices (BMPs) designed, in the collective, to reduce the discharge of stormwater pollutants to the maximum extent practicable. Each BMP is identified by a letter and number, with the letter indicating which Division within the Public Works or Planning and Development Department has lead responsibility, combined with a sequential number assigned to the Division’s set of BMPs, as follows:

A = Administration Division of Public Works Department (A1)

E = Engineering Division of Public Works Department (E1-E5)

F = Finance and Administration Division of Planning and Development Department (F1-F2)

M = Maintenance Division of Public Works Department (M1-M6)

P = Parks and Open Space Division of Public Works Department (P1-P7)

W = Wastewater Division of Public Works Department (W1)

This BMP naming and numbering convention helps ensure clear roles, responsibilities, and continuity over time in BMP implementation, adaptive management, and reporting. The 22 BMPs, listed in Table 4-1, are grouped into 10 categories:

- Public education and outreach
- Public participation and involvement
- Illicit discharge detection and elimination
- Construction site runoff control
- Post-construction site runoff for new development and redevelopment
- Pollution prevention and good housekeeping for municipal operations
- Industrial and commercial facilities
- Stormwater planning and capital improvements
- Mapping and data management
- Permit management

Table 5-1. SWMP Categories and BMPs	
Public Education and Outreach	
A1	Stormwater Education
P1	Educational Volunteer Program
F1	Household Hazardous Waste Disposal
Public Participation and Involvement (conducted by most BMPs; see Section 5.3.)	
Illicit Discharge Detection and Elimination	
M1	Management of Illicit Discharges to the Municipal Stormwater System
Construction Site Runoff Control	
E2	Erosion Prevention and Construction Site Management Program
Post-Construction Site Runoff for New Development and Redevelopment	
E4	Stormwater Development Standards
M6	Regulation of Inspection, Maintenance and Reporting of Private Underground Stormwater Facilities
P6	Private Vegetated Stormwater Facility Maintenance Program
Pollution Prevention and Good Housekeeping for Municipal Operations	
F2	Recycling and Solid Waste Management Programs
M2	Winter Road Sanding and De-Icing Program
M3	Street Sweeping, Debris Management, and Leaf Pick-up
M4	Prevent Leaks and Spills from Municipal Vehicles and Equipment
M5	Public Stormwater System Cleaning Program – Piped System
P2	Litter, Debris, and Illegal Camping Control in Parkland
P3	Tree Planting and Establishment Programs
P4	Public Vegetated Stormwater Facility Maintenance
P5	Public Stormwater System Maintenance – Open Waterways
P7	Pesticide and Fertilizer Use on City-Owned Lands
Industrial and Commercial Facilities	
W1	Industrial Stormwater Management Program
W2	Commercial Facilities Outreach and Inspection
Stormwater Planning and Capital Improvements	
E1	Stormwater Planning and Capital Improvement Projects
Mapping and Data Management	
E3	Stormwater System Mapping and Data Management
Permit Management	
E1	Permit Management and Reporting

5.2 Public Education and Outreach

Permit Requirements

Schedule A.3.a: MS4 Permit

The permittee must continue to implement a documented public education and outreach strategy to inform the public about the impacts of stormwater discharges on receiving waterbodies and the actions that they can take to reduce pollutants in stormwater runoff. The education and outreach strategy must identify pollutants of concern, the priority audience(s), specific education and/or activities, the entity or individual responsible for implementation, and be designed to address pollution from municipal stormwater within the permittee's communities. The strategy may incorporate elements of cooperative efforts undertaken with other regulated MS4s or efforts by other groups or organizations

This section of the SWMP includes the City's public education and outreach strategy (Section 5.2.1) and BMPs (5.2.2.).

5.2.1 Public Education and Outreach Strategy

The primary goal of the City's stormwater public education and outreach program is to inform and educate citizens of all ages and the business community in Eugene about the importance of protecting local waterways, and to promote behaviors and practices that protect and improve water quality and habitat.

Strategies include identifying the values and motives that resonate with different groups of citizens and connecting behaviors to these values to encourage "right-action." Tactics include maintaining an up-to-date City stormwater program web site, use of various media forms for providing information such as print, video, radio ads, television, and social media, hosting workshops, community booths, demonstrations, webinars, and neighborhood group conversations, and supporting a wide range of volunteer activities including adoption groups and work parties to plant trees, clean up and enhance waterways, remove invasive vegetation, and assist with maintenance of public stormwater facilities. The City's education and outreach messages and methods of communication will continue to be developed and conducted in a manner to ensure diversity, equity, and inclusion.

Pollutants of concern addressed by the education and outreach program include sediment and other particulates, oil and grease, phosphates, pesticides and fertilizers, heavy metals including zinc and mercury, and bacteria.

Key messages in the community include:

- Stormwater goes to local streams and rivers untreated, unlike wastewater which is treated and released into the Willamette River.
- Nothing but rain should go into a storm drain and even dirt is a pollutant
- Sediment is associated with other pollutants like mercury and other heavy metals, so reducing sediment will likely reduce other pollutants as well
- Impacts of non-stormwater and illicit discharges on receiving waterways including Amazon Creek and the Willamette River
- Winter weather best management practices to limit water quality impacts
- Individuals contribute to pollution by littering, property maintenance activities, and vehicle use

- There are things we can all do that benefit the environment and protect water quality and habitat
- Reduce or avoid altogether the use of pesticides/quick release fertilizer to prevent excess application from running off lawns/landscaping during storm events
- Proper disposal of household hazardous and non-hazardous waste
- Low impact development techniques to manage stormwater on individual properties including reducing impervious surface area and incorporating rain gardens into the landscape
- Ways to create wildlife habitat on individual properties
- How to report erosion, illegal dumping, illicit discharges, and spills
- Stormwater facilities provide important benefits and must be properly maintained to function
- Although wastewater is treated, some types of household and business products are not removed by the processes at the wastewater treatment plant and some products should not go down indoor drains and require proper disposal.

The City hosts events and workshops with community partner organizations including:

- Watershed Councils
- Soil & Water Conservation Districts
- Lane County Extension Service
- Friends of Trees
- Willamette Resources and Education Network (WREN)

Primary responsibility for implementing the public education and outreach program is the Stormwater Information Specialist in the Administration Division of the Public Works Department, in coordination with others across the program and organization including the Volunteer Coordinator in the Parks and Open Space Division of Public Works. The City also partners with other agencies and partnership groups in the region, in the media shed, and in the state, including:

- Lane Pollution Prevention Coalition
- Lane County Public Works and Waste Management
- City of Springfield Public Works and Land Management
- Urban Waters and Wildlife Partnership
- Clean Rivers Coalition –forthcoming statewide cultural “voice of water” campaign and lawn care pesticide reduction campaign

Priority audiences for outreach include:

- K-12 youth through stormwater curriculum and activities
- Community volunteers
- Underserved communities
- Neighborhood Associations (promotion of programs and events)
- Dog owners (doggie bags at public parks, pledge campaigns through newsletters, vet offices and dog-related businesses)
- Automotive businesses (e.g., for EcoBiz certification)
- Carpet cleaning businesses (Disposal best practices)
- Charity car washes (Fish Friendly Car Wash Kit)

- Development community (importance of green infrastructure)
- Private stormwater facility owners (facility management expectations/oversight/ submission of annual maintenance reports)
- Homeowner’s Associations (e.g., maintenance of private stormwater facilities)
- Homeowners and renters (lawn care/pesticide reduction, oil change fluids, car washing, managing stormwater on site, maintenance of private stormwater facilities)
- Construction site operators (Training notifications and wet weather best practices outreach)
- Businesses: landscaping/yard maintenance services, building maintenance, property management companies, painting services/contractors, carpet cleaners
- Food services businesses re: Grease & oil disposal on site, equipment rentals
- Other industrial and commercial businesses identified for sector-specific education and outreach needs via the IDDE program or industrial stormwater management program
- City staff and managers
- Local elected leaders (City Council newsletter items, Planning Commission and City Council work sessions, and topic-specific memos)
- City social media users (e.g., Next Door, Facebook, Twitter, YouTube)
- City website users: Eugene-or.gov with manuals, reports, education, code, maps, permits, complaint/spill/illegal dumping reporting, business licensing, staff contacts, etc.)

5.2.2 Public Education and Outreach BMPs

The City’s public education and outreach program is implemented primarily by the Public Works Administration Division, Parks & Open Space Division, and Planning & Development Department’s Building and Permit Services Division. The following BMPs represent the public education and outreach elements of the SWMP:

- A1 Stormwater Education
- P1 Educational Volunteer Program
- F1 Household Hazardous Waste Disposal

Education and outreach activities are also important elements of several additional program specific BMPs and are represented in other sections of the SWMP, including:

- M1 Management of Illicit Discharges to the Municipal Stormwater System (Sec. 5.4.)
- E2 Erosion Prevention and Construction Site Management Program (Section 5.5.)
- E4 Stormwater Development Standards (Section 5.6.)
- F2 Solid Waste Management (Section 5.7.)
- W2 Commercial Facilities Outreach and Inspection (Section 5.8.)
- E4 Permit Management and Reporting (Section 5.11)

A1	Stormwater Education
Responsible Department/Division	Public Works/Administration Division
Description	Continue to implement a public education and outreach strategy and revise as necessary to meet program goals. Provide stormwater information and education to homeowners, renters, school children, City and other agency staff and the general public about water quality problems in our community, the importance of protecting local waterways, and ways everyone can contribute. Conduct education and outreach using key values and motives that resonate with citizens and that encourage “right-action.” In addition, continue to educate commercial and industrial business owners about best management practices that can help prevent and reduce water quality impacts to the public stormwater system and local receiving waters.
Tasks	1. Update and improve upon educational materials through assorted print material, videos, web site, social media, and audio/visual media. 2. Prepare and staff booths at special events and workshops to reach community members. 3. Develop communication initiatives to support specific projects, programs, special opportunities, and community pollutants of concern.
Measurable Goals	• Increase awareness of residents and business owners about best practices to reduce runoff volume and pollutants of concern. • Conduct a qualitative evaluation of at least one education and outreach activity to determine attitudes, opinions, awareness, and behaviors related to stormwater. • Provide stormwater lessons and related resources to teachers and administrators in local school districts. • Continue to implement internal stormwater education to City staff through new employee orientation and work group presentations. • Collaborate on campaigns with other local, regional, statewide groups. • Review annually and update, as necessary, stormwater info websites.
Tracking Measures	• Document stormwater survey responses including any significant changes in attitudes, opinions, awareness, and behaviors. • Track number of students and teachers who use stormwater lessons. • Track number of employees attending stormwater education sessions. • Track number and types of information materials provided to the public. • Track number of attendees at public outreach events. • Track number of businesses reached, and information provided. • Identify collaborative campaigns, partners, audiences, and summaries.
References	• Overview of Eugene Stormwater Services • Stormwater and Water Quality (with links to resources and information) • Clean Rivers Coalition • Lane County Pollution Prevention Coalition (P2C)

P1	Educational Volunteer Program
Responsible Department/Division	Public Works/Parks & Open Space Division
Description	Manage and support the City's Volunteer Program promoting stormwater quality and stewardship activities on Parks and Open Space managed lands. Provide information and hands-on stewardship opportunities through adoption groups, in which volunteers commit to caring for parks and natural areas including waterways, and through project-specific work parties. These activities provide benefits to the environment while increasing public awareness related to improving water quality.
Tasks	1. Manage and support volunteer adoption groups. 2. Manage and support volunteer work parties for publicly owned vegetated stormwater facilities. 3. Involve community members in volunteer work parties for regular and drop-in events including projects aimed at invasive species removal, riparian vegetation planting, tree planting, and waterways clean-up. 4. Partner with community members to coordinate and implement large scale waterway clean-up work parties. 5. Inform community members about the purpose of the Volunteer Program and the City's Stormwater Program clean water messaging using outreach methods such as in-person, social media and on the Volunteer Program website.
Measurable Goals	• Continue to recruit adoption groups and partners. • Conduct three volunteer work parties annually addressing maintenance needs at publicly owned vegetated stormwater facilities. • On average, conduct 36 volunteer work parties related to water quality. • Conduct at least one community wide, partnership based large-scale waterway clean-up or enhancement work party per year. • Provide information at 36 volunteer events, post at least 6 messages to social media and provide the link to stormwater documents to the Volunteer Program website about the purpose of the Volunteer Program and the City's overarching stormwater messaging.
Tracking Measures	• Track the number of adoption groups. • Track the number of work parties involved in the maintenance of publicly owned vegetated stormwater facilities. • Track the number of water quality work parties. • Track the number and location of large-scale waterway clean-up and enhancement project(s) and the number of community participants. • Document efforts to educate the public about the City's Volunteer Programs and the protection of water quality as it relates to stormwater.
References	• Volunteer Program (includes links to volunteer options, internship opportunities, and the annual Volunteer Program Impact Report)

F1	Household Hazardous Waste Disposal
Responsible Department/Division	Planning and Development/Finance and Administration Division
Description	Support existing efforts and programs within the Eugene metro area to inform citizens of local opportunities for the proper discard and disposal of their household hazardous waste materials. Promote facilities and programs that provide such opportunities. The improper disposal of household hazardous waste poses a serious threat to local stormwater quality. Old paint, solvents and thinners, pesticides, bleach, drain cleaners, antifreeze, gasoline, used motor oil and other motor vehicle fluids can easily be flushed into the stormwater system if disposed of in yards, left uncovered in the rain, or poured down driveways or into the street. Supporting efforts to inform homeowners and tenants about where they can properly dispose of these products as well as supporting local household hazardous waste management facilities and efforts are effective ways to reduce the amount of these products that may otherwise make their way into the stormwater system and local receiving waters.
Tasks	1. Collaborate with Lane County Waste Management Division and City of Eugene stormwater program staff on educational outreach via the development and distribution of brochures, fact sheets, and community outreach events. 2. Collaborate with licensed solid waste haulers to notify their customers of the special wastes programs offered through the Lane County Waste Management Division. 3. Maintain information on a City website page that provides education on household hazardous waste and explains how to set up an appointment with Lane County Solid Waste to dispose of materials properly. 4. Collaborate with local metro area partners to publish information regarding waste prevention, recycling, composting, and disposal of household hazardous waste.
Measurable Goals	• Review City's Recycling and Solid Waste web site annually and update, as needed, to direct residents to the latest information about hazardous waste disposal. • Reach out to Lane County Waste Management and Eugene stormwater program staff to identify potential household hazardous waste-related outreach needs.
Tracking Measures	• Document updates to City's web site related to hazardous waste disposal. • Document information disbursed about household hazardous materials
Resources	• Recycling and Solid Waste Programs in Eugene • Batteries, Paint, Household Chemicals and Other Hazardous Materials

5.3 Public Involvement and Participation

Permit Requirements

Schedule A.3.b: MS4 Permit

The permittee must continue to implement a public involvement and participation program that provides opportunities for effective public participation in the maintenance, further development, and/or adaptive management of the permittee's stormwater program. The permittee must comply with their public notice requirements, if any, when implementing a public involvement participation process.

This section includes information about the various forms that public involvement and participation takes in developing, implementing, and adaptively managing the City's stormwater program. These types of activities are not centralized in one BMP but rather are woven throughout many of the SWMP BMPs, with some specific examples provided.

5.3.1 Public Involvement and Participation Activities

Public participation and involvement activities run through most BMPs and are implemented by all Divisions and Departments with a role in the stormwater management program. One of the primary ways that the City promotes and shares information and solicits public involvement and participation in stormwater program activities is via the City's publicly accessible web site. Some examples of opportunities currently available from the City's main web page (<https://www.eugene-or.gov/>) include:

- Select "Engage Eugene" to get to the City's online engagement platform where community members can contribute their ideas and influence decision making on a variety of local issues and projects. For example, select "Clean Rivers – Eugene" to take a poll to find out how "water savvy" you are, to get in touch with Eugene's Stormwater Information Specialist, or for the current Clean Water Connections newsletter.
- Scroll down to "Common Service Requests" to report a spill or observation of hazardous material and then follow up later to check the status of your service request by ID number.
- Scroll further to "Events" and "Meetings" to find out about upcoming events such as Sunday in the park with Smart Trips and to find out about upcoming neighborhood group meetings and City Council meetings.

In addition, the City maintains a web site to inform Spanish-speaking community members about services available and local issues and opportunities including stormwater-related issues:

<https://www.eugene-or.gov/4056/Servicios-de-tu-ciudad>.

Stormwater program-specific web pages are referenced from the individual BMP fact sheets in Sections 5.2 and 5.4 through 5.11. Links to program materials, relevant sections of Eugene City Code and Administrative Orders, regulatory and guidance documents, and contact information for staff are also on the City's web site and provided by reference from the fact sheets. A few highlights of public involvement and participation opportunities and activities include:

- BMP A1 (Stormwater Education), Section 5.2 – In conducting stormwater surveys to gauge awareness and behavior changes on stormwater topics, education staff reaches out into the community and results are shared and used for program adaptive management. Community involvement is solicited at stormwater-focused booths at local events and workshops such as the Home Show where kids and their parents are encouraged to participate in fun activities

and learn more about stormwater while doing so. The Clean Water Connections newsletter is mailed to all Eugene residents and, since contact information is provided for the Stormwater Information Specialist in the newsletter, citizens often follow up with questions or comments which are also used for program adaptive management. See the BMP fact sheet for more information including a link to program materials.

- P1 (Educational Volunteer Program), Section 5.2 – Community members are provided many opportunities to participate in stewardship activities including streamside tree planting, waterway cleanup, maintenance of public vegetated stormwater facilities, work parties at the native plant nursery in Alton Baker Park. Community members learn about local stormwater issues and solutions while having fun and participating with fellow citizens in these activities. See the BMP fact sheet for more information including a link to the web site and the annual Volunteer Program Impact Report.
- F1 (Household Hazardous Waste Disposal) and F2 (Recycling and Solid Waste), Section 5.2 – The City’s web site directs community members to important information about garbage, yard debris, and recycling collection services for Eugene residents and for information about Lane County’s household hazardous waste disposal services including how to make an appointment for free drop-off. See the BMP fact sheets for more information and a link to the web site and further referrals.
- M1 (Illicit Discharge Detection and Elimination), Section 5.4 – Community awareness and the ease with which citizens can access information about how to report a spill or potential illicit discharge is essential to the success of the IDDE program. Citizens can easily find the number to call to report a spill (#541-682-4800) or, as described above, can enter a service request from the main City web page and track its status. As with many other areas of the stormwater program, there are many opportunities in the IDDE program area for one-on-one conversations with residents and business owners to provide education, to receive input, and to inform program adaptive management.

Public involvement and participation are important for program implementation and adaptive management, and the highlights provided are just some examples in the stormwater program. In addition to the opportunities highlighted above and referenced from BMP fact sheets, formal public notice requirements for proposed actions such as an update to Eugene Code or an Administrative Rule will also follow local public notice requirements. The City will continue to seek new ways to effectively communicate with and solicit input from the Eugene community in implementing and adaptively managing the SWMP going forward.

5.4 Illicit Discharge Detection and Elimination

Permit Requirements

Schedule A.3.c: MS4 Permit

The permittee must continue to implement and enforce a comprehensive program to detect and eliminate illicit discharges into the MS4, to the extent allowable by state laws. In addition, the permittee must continue to implement procedures to prevent, contain, and respond to spills, as well as seepage from sanitary sewer system, which may discharge into the MS4 in accordance with all applicable federal and state laws, including proper notification to the Oregon Emergency Response System (OERS). An illicit discharge is any discharge to an MS4 that is not composed entirely of stormwater. Conditional exceptions are identified in Schedule A.1.d. Procedures and processes required below must be documented or referenced in the SWMP Document....

This section of the SWMP includes the City's illicit discharge detection and elimination BMPs.

5.4.1 Illicit Discharge Detection and Elimination BMPs

The City's illicit discharge detection and elimination program including responding to spills and complaints of illicit discharges and conducting outfall inspections and dry weather field screening activities, is implemented primarily by the Public Works Maintenance Division, in coordination with the Engineering and Wastewater Divisions. The program was established with the first MS4 permit and has been adaptively managed over the years since then to improve efficiency and effectiveness in reducing and eliminating illicit discharges to the MS4.

The following BMP represents most of the illicit discharge detection and elimination elements of the SWMP:

M1 Management of Illicit Discharges to the Municipal Stormwater System

Mapping of the stormwater system and related information including piped system data, outfall locations and attribute information, stormwater basin boundaries, and land use characteristics, is primarily the responsibility of the Engineering Division, with significant input and coordination with other divisions including Maintenance and Wastewater. Additionally, coordination across program areas is an important aspect of the IDDE program, including informing stormwater education and outreach needs based upon reoccurring incidents of certain types of illicit discharges, coordination on potential illicit discharges and follow up actions with the Erosion Prevention and Industrial Stormwater Management programs, and coordinating across programs on application of the City's penalty matrix. Education and outreach, erosion prevention, industrial/commercial stormwater management, and mapping and data management are represented in other sections of the SWMP, including:

- A1 Stormwater education (Section 5.2)
- E2 Erosion prevention and construction site management (Section 5.5)
- W1 Industrial stormwater management (Section 5.8)
- W2 Commercial Facilities Outreach and Inspection (Section 5.8.)
- E3 Mapping and Data Management (Section 5.10)

M1	Management of Illicit Discharges to the Municipal Stormwater System
Responsible Department/Division	Public Works /Maintenance Division
Description	Discourage and reduce improper discharges into the stormwater system through field screening and investigation, spill response, and operation of a stormwater discharge compliance enforcement program. The primary goals of this program are to protect the quality of the receiving waters of the City's stormwater system and to ensure that discharges to the City's stormwater system are in compliance with local, state, and federal regulations to the maximum extent practicable. As part of this program, the City will maintain an on-call team trained and equipped to investigate illicit discharges, respond to spills involving environmentally hazardous materials, and mitigate these discharges as necessary. Coordinate efforts with other local response teams such as the City of Eugene Fire and Police Departments, Lane County, and state agencies. The City will conduct periodic review of illicit discharge enforcement program practices and procedures and make revisions as deemed necessary. The stormwater field screening and investigation part of this program includes inspection of the public stormwater outfalls for condition assessment and the private stormwater system to assess water quality impacts to the municipal stormwater system. Where illicit discharges are found, actions are taken to identify the source and eliminate the discharge.
Tasks	1. Use CCTV inspection, dye testing, smoke testing, and field investigation to identify illegal connections, cross connections with the wastewater system and failures in the pipe system. 2. Inspect stormwater outfalls to identify illicit discharges, perform condition assessment, and track outfalls added or removed from the stormwater system. 3. Conduct annual dry-weather field screening inspections at priority locations per the City of Eugene Stormwater Enforcement Manual. 4. Maintain on-call list of personnel trained to respond to illicit discharges and an inventory of equipment necessary to mitigate illicit discharges. 5. Coordinate with the Fire Department/Hazmat Team on mitigation efforts including hazardous material clean-up and disposal. 6. Coordinate with Engineering to maintain up-to-date outfall mapping and inventory data. 7. Implement the City's Stormwater System Administrative Rule, 58-11-09-F, with the intent to prohibit improper connections and illegal discharges to the City's stormwater system by utilizing the existing enforcement and education programs. 8. Update the City of Eugene's Public Works Maintenance Spill Response and Illicit Discharge Operations Plan as necessary.

Measurable Goals	• Reduce the number of improper discharges into the municipal stormwater system through public education and reasonable enforcement of regulations. • Identify and remove illicit discharges to the municipal stormwater system through routine outfall inspections and the dry-weather field screening process. • Review and update, if necessary, the prioritization criteria for dry weather screening locations and include in updated SWMP by December 1, 2023. • Review and update as necessary a list of Hazardous Waste Operations and Emergency Response (HAZWOPER) trained personnel that are available for 24-hour emergency response. • Review and update annually or as necessary, the City’s On-Call Emergency Roster for Environmental Spills.
Tracking Measures	• Track the number and location of work orders pertaining to illicit discharges, the number of verified illicit discharges, and related enforcement actions. This includes illicit discharges related to BMPs E2 and W1. • Track the number of outfalls inspected annually. • Document dry-weather field screening inspections including number and location of inspections conducted and follow-up details. • Document all updates to HAZWOPER trained personnel list and On-Call Emergency Roster for Environmental Spills.
References	• Stormwater Operations web page, including links to Illicit Discharge Response and Enforcement Manual and Field Screening Map

5.5 Construction Site Runoff Control

Permit Requirements

Schedule A.3.d: MS4 Permit

The permittee must continue to implement and enforce a construction site runoff control program to reduce discharges of pollutants from construction sites in its coverage area. The permittee must continue to implement their existing construction site runoff program as the new requirements are developed and implemented....

This section of the SWMP includes the City's construction site runoff control BMPs.

5.5.1 Construction Site Runoff Control BMPs

The City's erosion prevention and construction site management program is implemented by the Public Works Engineering Division and Planning and Development Department's Building and Permit Services Division. The program is outcomes based in that all construction activities must meet certain outcomes regardless of whether a permit is required. Details about the program requirements including the required outcomes, triggers for needing to obtain a permit, expectations for Erosion and Sediment Control Plans, plan review, inspection and enforcement procedures, and staff training, are described in or referenced from the BMP fact sheet.

The following BMP represents most of the construction site runoff elements of the SWMP:

E2 Erosion Prevention and Construction Site Management

Erosion prevention and construction site management is a significant factor in the construction of public capital improvement projects. Also, erosion prevention staff coordinate with IDDE and industrial/commercial stormwater program staff on investigating potential illicit discharges to the MS4, conducting site inspections, and coordinating on enforcement actions as necessary:

- M1 Illicit Discharge Detection and Elimination (Section 5.4)**
- W1 Industrial Stormwater Management (Section 5.8)**
- W2 Commercial Facilities Outreach and Inspection (Section 5.8.)**
- E1 Stormwater Planning and Capital Improvements (Section 5.9)**

E2	Erosion Prevention and Construction Site Management Program
Responsible Department/Division	Public Works/Engineering Division
Description	Administer and monitor an Erosion Prevention and Construction Site Management Program in compliance with Eugene Code 6.625-6.645 and associated Administrative Rule, preventing and mitigating pollutant and sediment discharges into the City's stormwater system due to construction activities and land disturbance.
Tasks	1. Screen all development permits for sensitive area status, participate in project consultations, conduct plan reviews, issue permits, conduct inspections, and provide compliance enforcement as appropriate. 2. Issue Erosion Permits for construction activities which: • disturb an area of land one acre or greater in size; or • disturb an area 500 square feet or greater within a sensitive area (i.e., adjacent to a water feature or its buffer, ground slopes greater than 10%, having highly erodible soils); or • disturb more than 5,000 cubic feet of material 3. Conduct education and outreach related to erosion prevention and construction site management techniques and practices. 4. Continue to act as 1200-C Agent for DEQ.
Measurable Goals	• For erosion-permitted sites, conduct one inspection prior to the commencement of work, monthly or as necessary thereafter, and upon completion of construction activities to ensure compliance. • For non-erosion-permitted sites, conduct inspections as necessary to ensure compliance with Eugene Code. • Conduct one annual erosion prevention training event per year. • Maintain training, education and relevant qualifications for all erosion plan review, inspection, and enforcement staff. • Review annually and update, as necessary, erosion prevention web site.
Tracking Measures	• Track the following, inside city limits and within urban transition area: number of permits issued, inspections conducted, enforcement actions. • Track the number of training/outreach events. • Track the number of work orders pertaining to erosion-related illicit discharges, verified illicit discharges, and related enforcement actions. (Note: this data to be comprehensively reported in BMP M1) • Track the number of training/outreach events conducted and attended.
References	• Eugene Code Sections 6.625-6.645 (Erosion Prevention) • Administrative Order 58-03-01-F (Erosion Prevention Rule) • Erosion Prevention Webpage • Building Permit Services Permit Applications and Checklists • Standard Specifications for Construction and Standard Drawings

5.6 Post-Construction Site Runoff for New Development and Redevelopment

Permit Requirements

Schedule A.3.e: MS4 Permit

The permittee must continue to implement their post-construction stormwater pollutant and runoff control program as they develop, implement, and enforce the requirements of Schedule A.3.e to control stormwater runoff from new development and redevelopment project sites in its coverage area and reduce the discharge of pollutants. The permittee must describe or refer to full documentation of its programs in the SWMP Document.

This section of the SWMP includes the City’s post-construction site runoff for new development and redevelopment BMPs.

5.6.1 Post-Construction Site Runoff for New Development and Redevelopment BMPs

The City’s post-construction stormwater management program for new development and redevelopment is implemented by several divisions within the Public Works Department and by the Building and Permit Services Division within the Planning and Development Department.

Eugene Code Sections 9.6790-9.6976 (Stormwater Development Standards) and 6.600-6.615 (Stormwater Service and Facility Maintenance) and the Stormwater Management Manual (adopted by Administrative Order 58-14-01-F) regulate the siting, design, operations and maintenance of flood control, water quality, flow control, oil control, and source control facilities for stormwater runoff from development of new and replaced impervious surfaces.

First adopted in 2006, the “Stormwater Development Standards” as they are referred to in Eugene, were updated in 2014 including to incorporate a hierarchy requiring infiltration-type facilities to be considered first as the highest priority, followed by filtration-type facilities, and then mechanical treatment devices. Other 2014 revisions included implementing an off-site low impact development (LID) mitigation program for applications meeting criteria demonstrating that on-site infiltration or filtration cannot be accommodated and updating the Stormwater Management Manual for consistency with the Eugene Code updates, consistency with the new LID mitigation program, and to incorporate lessons learned since 2006 about the siting, design, and O&M of stormwater facilities.

The following BMPs represent the primary post-construction stormwater management elements of the SWMP:

- E4 Stormwater Development Standards
- M6 Regulation of Inspection, Maintenance and Reporting of Private Underground Stormwater Facilities
- P6 Private Vegetated Stormwater Facility Maintenance Program

There are many additional BMPs across the program that support or supplement stormwater development standards implementation. For example, the stormwater education program provides support by creating brochures, newsletter articles, and web site resources to help inform the public about stormwater facilities’ functions and values. Stormwater capital improvement projects are constructed each year to address multiple priorities in the stormwater program including flood control and conveyance, water quality enhancements, and natural resource restoration projects.

Capital projects are selected using a scoring and prioritization process that includes criteria that score projects for the degree to which they would protect or restore natural watershed functions and the degree to which they address a TMDL pollutant. Support for stormwater development standards is provided by the Public Works Engineering Division's Mapping and Data Management team. As new public and private stormwater facilities are constructed, mapping and data updates are made to the City's infrastructure database, public facilities are incorporated into the public system maintenance programs, and private systems are added to the inventory of facilities requiring oversight to ensure their continued maintenance. BMPs that support and supplement Stormwater Development Standards include:

- A1 Stormwater Education (Section 5.2)
- M5 Public Stormwater System Cleaning Program – Piped System (Section 5.7)
- P4 Public Vegetated Stormwater Facility Maintenance (Section 5.7)
- W1 Industrial Stormwater Management Program (Section 5.8)
- W2 Commercial Facilities Outreach and Inspection (Section 5.8.)
- E1 Stormwater Planning and Capital Improvements (Section 5.9)
- E3 Stormwater System Mapping and Data Management (Section 5.10)

E4	Stormwater Development Standards
Responsible Department/Division	Public Works/Engineering Division
Description	Continue to implement post-construction Stormwater Development Standards, Eugene Code 9.6790-9.6797, Eugene Code 7.143 (3), and associated Stormwater Management Manual. The Stormwater Development Standards regulate the location, design, construction, and maintenance of private and public stormwater facilities for water quality, flood control, and flow control for headwaters sites. The standards utilize a hierarchy of best management practices which emphasizes on-site green infrastructure and infiltration-type low impact development (LID) techniques over mechanical approaches and include provisions for off-site LID mitigation in certain circumstances. Review and update Stormwater Development Standards as necessary.
Tasks	1. Review land use applications for applicability and compliance with stormwater development standards. 2. Screen development permits for applicability of post-construction requirements, conduct plan review, approvals, and inspections. 3. Track, evaluate, and develop new technologies and practices for post-construction stormwater management. 4. Provide training and technical assistance to City staff and the public. 5. Review and update, as necessary, LID/Green Infrastructure strategy. 6. Review and update, as necessary, Eugene's Stormwater Development Standards including the City's Stormwater Management Manual.
Measurable Goals	• Review land use and/or development permit applications (i.e., earliest stage of review) for applicability and compliance with stormwater development standards. • Review and approve construction plans for public and private stormwater facilities for compliance with Stormwater Development Standards and conduct inspections during construction. • Review staff professional qualifications and training level related to stormwater management. • Review, update, and document LID/GI strategy by December 1, 2023. • Review and update, as necessary, Stormwater Development Standards including Stormwater Management Manual by December 1, 2024.
Tracking Measures	• Track number of land use applications reviewed. • Track number and type of private stormwater facilities permitted with development permits including building permits. • Track number of, and criteria met for, off-site LID mitigation approvals. • Track number and type of public stormwater facilities constructed. • Track staff professional certifications and job-related training. • Track number and type of training events held.
References	• Eugene Code Sec. 9.6790-9.6797 (Stormwater Development Standards) • Stormwater Management Manual

M6	Regulation of Inspection, Maintenance and Reporting of Private Underground Stormwater Facilities
Responsible Department/Division	Public Works /Maintenance Division
Description	Implement and manage a program to ensure that privately owned and operated underground stormwater treatment structures are properly maintained. The program employs guidance provided by the City of Eugene Private Mechanical Stormwater Treatment Inspection and Compliance Manual.
Tasks	1. When accepted by the City, include new private mechanical stormwater treatment facilities in City's database for tracking. 2. Provide written correspondence to the private operator, as needed, such as inspection notifications, reporting reminders, notices of non-compliance, notices of violation, and enforcement documents. 3. Maintain mechanisms, processes, and procedures to track structure type, stormwater facility ownership, maintenance inspections, required reports, corrective maintenance activity and enforcement actions. 4. Use preventive maintenance schedule to assist in determining inspection frequency based on priority of stormwater facility. 5. Review required inspection and maintenance logs submitted by stormwater facility owners.
Measurable Goals	• Inspect all new private underground stormwater structures at the time of construction and document pertinent information. • Establish a correspondence file for each structure/operator. • Amend Administrative Order 58-11-09-F, as needed, to remove the requirement to submit maintenance logs annually while retaining the requirement to keep records on file at the facility. • Ensure that each private underground stormwater structure is inspected, maintained, and documented as required by the Private Mechanical Stormwater Treatment Inspection and Compliance Manual. • Review inspection and maintenance reports for privately-owned underground stormwater facilities.
Tracking Measures	• Document the number of new private underground stormwater structures added to the City's database. • Track the number of private inspections, maintenance and reporting activities conducted. • Track any enforcement activities related to the individual structures.
References	• Stormwater Operations web page, including links to Private Mechanical Stormwater Treatment Inspection and Compliance Manual and Administrative Order 58-11-09-F (Stormwater System Rule)

P6	Private Vegetated Stormwater Facility Maintenance Program
Responsible Department/Division	Public Works/Parks and Open Space Division
Description	Implement and manage a program to ensure that privately owned and operated vegetated stormwater treatment facilities are maintained as designed and constructed, in accordance with approved operations and maintenance plans. The program ensures each facility is routinely inspected, corrective maintenance actions are performed, and completion of activities are regularly documented.
Tasks	1. Upon acceptance by the City, include new private vegetated facilities in City's database for tracking. 2. Update the Private Stormwater Facilities Procedure Manual to optimize efficiencies within existing resources. 3. Amend Administrative Order 58-11-09-F, as needed, to remove the requirement to submit maintenance logs annually while retaining the requirement to keep records on file at the facility. 4. Ensure that each facility is inspected at the appropriate frequency and in accordance with the Private Stormwater Facilities Procedure Manual 5. Correspond with private stormwater facility owners, provide support and information, including outreach materials to better understand and more effectively implement the agreed upon operations and maintenance plan
Measurable Goals	• Inspect all new vegetated private stormwater facilities at the time of construction and document pertinent information. • Review annual inspections for non-compliance and follow procedures for notice as outlined in the Private Stormwater Facilities Procedure Manual • Analyze trends and anticipated growth annually and update the Private Stormwater Facilities Procedure Manual and outreach materials accordingly.
Tracking Measures	• Document the number of new private vegetated stormwater facilities added to the City's database. • Document the number of existing facility inspections • Document updates to the Private Stormwater Facilities Procedure Manual • Document the number of notices of non-compliance
References	• Rain Garden Resources web page, including links to: • Private Stormwater Facilities Procedure Manual • Outreach materials • Admin Order 58-11-09-F (Stormwater System Rule)

5.7 Pollution Prevention and Good Housekeeping for Municipal Operations

Permit Requirements

Schedule A.3.f: MS4 Permit

The permittee must properly operate and maintain its facilities, using pollution prevention and good housekeeping to reduce the discharge of pollutants through the MS4 to waters of the state....

This section of the SWMP includes the City’s pollution prevention and good housekeeping BMPs.

5.7.1 Pollution Prevention and Good Housekeeping BMPs

In the context of the MS4 Phase I permits, “pollution prevention and good housekeeping” refers to the operations and maintenance of publicly owned and managed facilities including public streets and landscaped areas within the right-of-way, roadside ditches, public parks, facility maintenance yards, and the municipal stormwater system (including catch basins, storm inlets, vegetated and mechanical stormwater facilities, pipes, and manholes). The City manages all these public assets in a manner that prevents and minimizes, as much as practicable, the discharge of pollutants through the municipal stormwater system to Amazon Creek and the Willamette River.

The City’s operations and maintenance (pollution prevention and good housekeeping) BMPs are conducted primarily by the Maintenance and Parks and Open Space Divisions in the Public Works Department. Additional operations and maintenance is conducted by the Planning Division of the Planning and Development Department in their role of managing the recycling and solid waste programs, and by the Facility Management Division of the Central Services Department in their role of general street and landscape maintenance of the public areas in the downtown core business district area.

The following BMPs represent the pollution prevention and good housekeeping elements of the SWMP:

- F2 Recycling and Solid Waste Management Programs
- M2 Winter Road Sanding and De-Icing Program
- M3 Street Sweeping program and Leaf Pick-up
- M4 Prevent Leaks and Spills from Municipal Vehicles and Equipment
- M5 Public Stormwater System Cleaning Program – Piped System
- P2 Litter, Debris, and Illegal Camping Control in Parkland
- P3 Tree Planting and Establishment Programs
- P4 Public Vegetated Stormwater Facility Maintenance
- P5 Public Stormwater System Maintenance – Open Waterways
- P7 Pesticide and Fertilizer Use on City-owned Lands

Several other BMPs frequently collaborate with, support, or are informed by, the operations and maintenance programs. For example, stormwater education and outreach collaborates with the recycling and solid waste management programs to promote waste reduction activities such as food composting, mapping and data management supports all of the operations and maintenance

activities by maintaining accurate system information and providing maps and data to inform O&M, future changes to the City's stormwater development standards for new development and redevelopment are informed by what staff learn by maintaining vegetated stormwater facilities, and stormwater planning and capital improvement project needs are informed by the stormwater system cleaning program. BMPs that frequently collaborate with, support, or are informed by operations and maintenance programs include:

- A1 Stormwater Education and Outreach (Section 5.2)
- E4 Stormwater Development Standards (Section 5.6)
- E1 Stormwater Planning and Capital Improvement Projects (Section 5.9)
- E3 Stormwater System Mapping and Data Management (Section 5.10)

F2	Recycling and Solid Waste Programs
Responsible Department/Division	Planning and Development/Finance and Administration Division
Description	Evaluate and revise, as necessary, existing solid waste and recycling collection rules to address stormwater quality. Improper and/or unregulated collection and recycling of solid waste has a serious potential for creating negative impacts to stormwater quality. High collection fees, infrequent or spotty collection service may lead to illegal dumping activity. Unregulated waste containers may be prone to leaking or spilling allowing pollutants to wash into the storm system. By continuing to monitor and evaluate local solid waste management collection efforts, the City will be better able to improve local regulations so that stormwater quality is protected.
Tasks	1. Regulate solid waste and recycling collection activities within the City limits to curb possible impacts to the stormwater systems from leachate of garbage, yard debris, and recycling materials. 2. Support a minimum of every-other-week/bi-monthly curbside collection service for organic materials and provide backyard composting classes for residents with or without collection service. 3. Continue to implement the nuisance abatement enforcement program that provides rapid response to illegal dumping of garbage, yard debris, or other solid waste materials. 4. Provide up to date information about recycling and solid waste on City's web site.
Measurable Goals	• Review Administrative Rule R-3.250 annually to ensure that regulations are up to date and requirements to support appropriate waste management and prevention are included, update changes to the Admin Rule via Administrative Order as necessary. • Review the need to conduct a waste composition study once per permit term; if needed, contract with Oregon DEQ to conduct the study. • Review City's recycling and solid waste web site annually and update, as needed, to direct residents to the latest information about recycling and waste prevention news, resources, and local events.
Tracking Measures	• Document updates to Administrative Rule R-3.250 • Document tons of organic materials collected through curbside program. • Document number of compost demo workshops and participants. • Document number of garbage handling enforcement cases. • Document and compare waste composition study with the prior one.
Resources	• Eugene Code Section 3.250-3.270 • Solid Waste, Yard Debris, Food Waste, Organics, and Recycling Collection Admin Rule R-3.250 • https://www.eugene-or.gov/427/Recycling-and-Solid-Waste

M2	Winter Road Sanding and De-icing Program
Responsible Department/Division	Public Works /Maintenance Division
Description	Apply and clean up winter traction sand on publicly maintained roads and parking areas in conjunction with the application of a pre-wetting agent designed to reduce the need for repeat sanding. Conduct research efforts to identify and evaluate new technology and strategies for application of environmentally friendly chemical anti-icing and de-icing agents. Conduct research into new methods, practices, and efficiencies which may further limit the runoff of sanding related pollutants to the storm system. Conduct preseason staff training on the proper application methods of sand and chemical agents.
Tasks	1. Apply sand to roadways in accordance with the Public Works Snow and Ice Plan. 2. Apply chemical agents in accordance to Guidelines for Anti-icing/Deicing included in the Public Works Snow and Ice Plan. 3. Respond to priority routes as outlined in Public Works Snow and Ice Plan. 4. Collect data such as streets plowed and sanded, amount material used, and other data related to snow/ice events.
Measurable Goals	• Minimize the use of abrasive materials (sand) for snow and ice control through adaptive management practices. • Begin cleanup of abrasive materials (sand) when streets become free of ice and snow, and the forecast does not call for more ice and snow within the next 24 hours.
Tracking Measures	• Document the quantities of sand applied and collected during each storm event. • Document the volume of deicing/anti-icing agents used for winter operations. • Document the number of lane miles where sand or deicing agents are applied. • Document initiation of sand cleanup following winter storm events where sand has been applied.
References	• Public Works Snow and Ice Plan

M3	Street Sweeping, Debris Management and Leaf Pick-up
Responsible Department/Division	Public Works /Maintenance Division
Description	Undertake both mechanical brush and vacuum sweeping of publicly maintained roads, bike paths, and parking lots in accordance with the Stormwater Operations and Maintenance (O&M) Manual. Monitor and evaluate new technology and methods related to street sweeping and make appropriate adjustments to the current sweeping program when feasible to maximize water quality benefits. Collect debris from right of way and track related data. Conduct annual Leaf Collection Program.
Tasks	1. Follow sweeping frequencies as outlined in Stormwater O&M Manual. 2. Collect sweeping data such as amount of debris swept, curb miles swept, streets and/or areas swept. 3. Remove debris from right of way from unsanctioned camping and illegal dumping. 4. Conduct annual curbside pickup of leaves on City streets.
Measurable Goals	Follow sweeping frequencies as outlined in the Stormwater O&M Manual: Street sweeping: • Sweep downtown core and industrial areas once per week. • Sweep university areas every 2 weeks. • Sweep arterial streets every 2 weeks. • Sweep residential streets every 8 weeks. • Sweep bike paths and improved alleys twice per year. • Sweep Eugene Airport parking lots and tarmac monthly • Sweep Public Works Wastewater lots monthly Debris Management: • Respond to requests for service related to debris in right of way and illegal dumping. Leaf pick-up: • Coordinate and manage two seasonal opportunities for citizens' leaves to be picked up and managed by the stormwater operations crew.
Tracking Measures	• Track lane miles swept. • Track amount of debris collected. • Track the number of emergency/special sweep requests. • Track request for service for debris in right of way/illegal dumping. • Track amount collected from debris in right of way/illegal dumping. • Track amount of leaves picked up.
References	• Stormwater Operations web page, including link to Stormwater Operations and Maintenance Manual

M4	Prevent Leaks and Spills from Municipal Vehicles and Equipment
Responsible Department/Division	Public Works /Maintenance Division
Description	Undertake preventive maintenance program for all municipal vehicles and equipment in order to prevent or correct sources of vehicle fluid leaks. Implement employee education practices and field operations procedures to detect and report leaks and to prevent incidences of fluid and material spills from municipal vehicles and equipment. Equip municipal trucks and large equipment with renewable spill response kits.
Tasks	1. Maintain training competencies for Fleet Services employees. 2. Maintain a preventative maintenance schedule for all vehicles and equipment. 3. Maintain a supply of spill kit materials for designated vehicles and equipment. 4. Provide annual HAZWOPR awareness level training to Public Works Maintenance and Parks and Open Space staff. 5. Fleet staff ensures that spill procedure cards are in all City vehicles and equipment.
Measurable Goals	• Perform preventative maintenance service on all City vehicles and equipment in accordance with the preventative maintenance schedule. • During the repair/clean-up process, analyze the type and cause of the spills associated with the repairs conducted by Fleet staff, and evaluate whether operator training may be helpful with spill minimization. • Keep spill procedure cards in all City vehicles and large equipment.
Tracking Measures	• Track the number of vehicles and equipment that receive preventative maintenance service. • Track the number of Fleet service employees that receive annual spill response training.
References	(No references)

M5	Public Stormwater System Cleaning and Inspection Program – Piped System
Responsible Department/Division	Public Works /Maintenance Division
Description	Undertake frequent, systematic cleaning of the components of the public stormwater system such as catch basins, pipes, culverts, inlets, and underground stormwater quality devices in accordance with the adopted Stormwater Operations and Maintenance (O&M) Manual. Document quantities of material removed from each structure. Using the maintenance management system, refine the regular cleaning schedule for pipes, catch basins, and underground stormwater quality devices. Inspect the piped stormwater system to identify needed repairs and to maintain accurate GIS and mapping information. Research and monitor developments in maintenance technology and operations and maintenance methods for the closed systems which will further increase the effectiveness of our cleaning practices and water quality improvement practices.
Tasks	1. Follow cleaning procedures as outlined in the Stormwater Operations and Maintenance Manual. 2. Inspect new pipe systems to ensure proper connections. CCTV inspect existing city pipes for repair, cleaning needs, illicit discharge investigation. 3. Assess, inspect, and map details of public and private stormwater system.
Measurable Goals	• Clean 1/3 of the all the public catch basins and inlet structures annually. • Maintain or increase annual amount of debris removed from stormwater system as compared to previous 5-year average. • Maintain all public underground stormwater quality structures at least once per year or as outlined in the Stormwater O&M Manual. • CCTV 100% of new installed public stormwater pipes. • Identify and repair defects to the piped stormwater system. • Improve accuracy of the Stormwater System layer in our Geographic Information Systems (GIS) through map update requests.
Tracking Measures	• Track number and percentage of catch basins and inlets cleaned. • Track the number and percentage of public underground stormwater quality structures maintained. • Track the lineal footage of stormwater lines cleaned. • Track the amount of debris recovered from public catch basins, inlet structures, underground stormwater quality structures, and storm lines. • Track work orders created for system repairs discovered through the inspection process. • Track the number of map update requests forwarded to the GIS team.
References	• Stormwater Operations web page, including link to Stormwater Operations and Maintenance Manual

P2	Litter, Debris, and Illegal Camping Control in Parkland
Responsible Department/ Division	Public Works/Parks and Open Space Division
Description	Manage and support efforts to reduce impacts to stormwater runoff and local receiving waters by controlling litter and debris as well as garbage and trash from illegal camp sites in City managed parklands. There are two primary focal points of this BMP. The first is to provide opportunities for proper disposal of litter and trash at strategic publicly owned sites to prevent it from being washed into the public stormwater system. The second is to clean-up illegal camp sites prior to pollutants from the trash and debris being washed into the public storm system or the local receiving waters.
Tasks	1. Place trash receptacles in parks, public areas and at venues for public events which are likely to generate garbage, litter, and other throw-away items. Provide frequent collection service to prevent over filling. 2. Require up-front security deposits for large events in City parks, rental of park shelters, and rental of other City owned and operated recreation or outdoor cultural facilities. 3. Conduct debris inspections of significant waterways under the City's jurisdiction and remove illegally dumped or discarded debris and other items as appropriate. 4. Conduct inspections along riverbanks and in other undeveloped lands under the City's jurisdiction to locate, dismantle, and clean-up illegal camp sites and their associated trash, garbage, debris, and bio-hazardous materials.
Measurable Goals	• Ensure all parks, public spaces managed by the City, and all venues for outdoor public events on City lands have adequate trash receptacles. Empty trash receptacles frequently enough to prevent spillage due to being over filled. • Ensure all rentals of parks, park shelters, and other City operated outdoor facilities will result in no loose litter and debris left behind. • Inspect the Willamette River and Amazon Creek corridors and other waterways for dumped or discarded debris and illegal campsites. Remove dumped materials, dismantle illegal campsites and clean-up as soon as is physically and legally possible.
Tracking Measures	• Track the number of trash receptacle collection instances throughout the park system. • Track the number of illegal campsites cleaned-up along riverbanks, waterways and park areas managed by the City. • Track the total volume of trash and debris removed from parks and open space areas.
References	(No references)

P3	Tree Planting and Establishment Programs
Responsible Department/Division	Public Works/Parks and Open Space Division
Description	Manage and support both governmental and community tree planting programs to further the multiple benefits that trees provide for protecting and enhancing stormwater quality.
Tasks	1. Plant and maintain street trees in existing public rights-of-way. 2. Plant trees in City-owned parks and natural areas. 3. Facilitate required planting of street trees in new private developments in accordance with Eugene Code 7.280. 4. Plant or replace street trees during public street construction and renovation. 5. Involve community members in tree planting efforts. 6. Support establishment of newly planted trees over three-year period.
Measurable Goals	• On average, plant 500 street trees/year in existing public rights-of-way. • On average, plant 100 trees/year in City-owned parks and natural areas. • Maximize planting of street trees with all new private developments in accordance with Eugene Code 7.280. • Maximize planting of trees during public street construction and renovation. • Involve community members in tree planting efforts. • Hire staff or contractor to conduct seasonal watering.
Tracking Measures	• Track the number of street trees planted each year in existing public rights-of-way. • Track the number of trees planted each year in City-owned parks and natural areas. • Track the number of street trees planted through the new development tree planting requirements (Eugene Code 7.280). • Track the number of street trees planted through City-engineered street construction and renovation projects. • Track the number of tree planting and establishment events and number of participants. • Document hiring of staff or contractor for seasonal watering program.
References	• Tree Planting, Care and Removal web page • Eugene Code Section 7.280 (Street Tree Program)

P4	Public Vegetated Stormwater Facility Maintenance
Responsible Department/Division	Public Works/Parks and Open Space Division
Description	Perform ongoing maintenance, inspection, and cleaning of all vegetated stormwater facilities under the City's jurisdiction, including parkland and rights-of-way. Conduct operations and maintenance activities in a manner that protects and improves water quality.
Tasks	1. Ensure that all publicly owned vegetated stormwater facilities are properly operated and maintained. Inventory, map, inspect and maintain in accordance with current Maintenance Standards Manual to ensure facilities continue to function as designed. 2. Research, evaluate, and implement park and landscaped area design practices and new vegetation management techniques to minimize impervious surfaces; reduce pesticide and fertilizer use; and maximize the use of drought tolerant native vegetation where appropriate.
Measurable Goals	• Inventory and map all new publicly owned vegetated stormwater facilities. • Schedule, conduct, and document inspections of all publicly owned vegetated stormwater facilities in accordance with current Maintenance Standards Manual. • Provide scheduled maintenance of all publicly owned vegetated stormwater facilities in accordance with the current Maintenance Standards Manual. • Track annual maintenance inputs. Analyze growth, trends, and condition rating to adaptively manage annual work planning and maintenance strategies.
Tracking Measures	• Document annual review and any updates to the Maintenance Standards Manual. • Document the number of publicly owned vegetated stormwater facilities. • Document maintenance activities performed on publicly owned vegetated stormwater facilities. • Document condition rating of each facility based on inspections performed in accordance with the Maintenance Standards Manual. • Track total sediment removed from publicly owned vegetated stormwater facilities.
References	• Rain Garden Resources web page, including link to: • Public Vegetated Stormwater System Maintenance Standards Manual

P5	Public Stormwater System Maintenance – Open Waterways
Responsible Department/ Division	Public Works/Parks and Open Space Division
Description	Manage public open waterways and ditches consistent with adopted Open Waterway Maintenance Plans and maintenance standards. These plans and standards are intended to protect and enhance stormwater quality and natural resources values while continuing to maintain sufficient conveyance capacity.
Tasks	1. Follow written procedures for on-going maintenance of open waterways and ditches, including pruning woody vegetation, utilizing the Open Waterway Maintenance Plans and maintenance standards. 2. Establish native trees and shrubs along portions of waterways as needed. 3. Evaluate erosion and slumping issues as they occur, and repair as needed. 4. Review, and if necessary, revise, Open Waterway Maintenance Plans and maintenance standards to incorporate new information and techniques to further advance the goal of maximizing water quality and habitat benefits while also maintaining sufficient conveyance. 5. Review and update GIS data for open waterways and ditches to facilitate asset management and inspections.
Measurable Goals	• Prune woody vegetation within active channel zone, or “green pipe”, on annually prioritized open waterways to maintain conveyance while maintaining water quality and other natural resource function. • Annually establish native trees and/or shrubs on approximately 1,000 linear feet of waterway to help shade streams, lower water temperatures, and increase slope stability. • Once within the permit term, review Open Waterway Maintenance Plans and maintenance standards and, if deemed necessary, revise. • Conduct and document inspections of open waterways and ditches as prescribed in the maintenance standards.
Tracking Measures	• Document miles of open waterway and ditches maintained each year. • Document linear feet of waterways planted with trees and/or shrubs and general type of native species planted. • Document number of channel bank repair projects (e.g., to reduce erosion or slumping) completed each year and total linear feet of such repairs. • Document timing of review and any updates to the Open Waterways Maintenance Plans and maintenance standards. • Document completion of inspections of open waterways and ditches based on maintenance standard priorities.
References	• Waterways Web Page (includes link to Open Waterway Maintenance Plan)

P7	Pesticide and Fertilizer Use on City-owned Lands
Responsible Department/Division	Public Works/Parks and Open Space Division
Description	The focus of this BMP is to control and minimize the use and application of pesticides (including herbicides) and fertilizers on City-owned properties and facilities. Evaluate and, as necessary, adapt or revise turf, landscape, and natural area vegetation management programs to protect and improve water quality for lands under the City's jurisdiction.
Tasks	1. Annually review existing Integrated Pest Management (IPM) policies and procedure documents and update as necessary in light of new information and techniques. 2. Review status of all City Department IPM policies and procedures. 3. Research, evaluate, and implement land management practices and new vegetation management techniques to reduce pesticide and fertilizer use. 4. Continue the Pesticide Free Parks program. Revise, adapt, and expand program as appropriate. Utilize the IPM policy and Operations Manual to identify and maintain Pesticide Free Zones within Eugene's parks.
Measurable Goals	• Complete an annual review of the IPM policy and Operations Manual; update and refine in accordance with integrated pest management principles and new information on effectiveness and safety as necessary. • Coordinate with other City Departments to update their IPM policies and procedures. • Conduct annual review meeting with staff to evaluate and update IPM policies, procedures, and best management practices for use of pesticides and fertilizers. • Provide service to existing pesticide free parks and pesticide free zones within parks. Maintain web site with information on Pesticide Free Parks and IPM as necessary.
Tracking Measures	• Document frequency of review and any updates to the IPM policy and procedure documents. • Document updates to inventory of Pesticide Free Parks and pesticide free zones within developed parks. • Track total use of pesticides and fertilizers in parks annually.
References	• Eugene Parks and Open Space Integrated Pest Management Program • Pesticide-Free Parks

5.8 Industrial and Commercial Facilities

Permit Requirements

Schedule A.3.a: MS4 Permit

The permittee must continue to implement a program to reduce pollutants in stormwater discharges to the MS4 from industrial and commercial facilities including, at a minimum: sites the permittee has identified as being subject to the DEQ-issued 1200-Z industrial stormwater NPDES general permit; hazardous waste treatment, disposal and recovery facilities; industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986; facilities subject to Section 313 of the Emergency Planning and Community Right-to-Know Act, 42 U.S.C. 11023; sites flagged by a pretreatment program or Industrial User Survey as potentially contributing, or housing activities that may contribute, pollutants to the MS4; and facilities or activities that have been identified by the permittee as potentially contributing a significant pollutant load to the MS4. Screening for industrial and commercial sites and activities may be conducted in conjunction with industrial pretreatment program activities or a business licensure program as long as stormwater and MS4 considerations are added to the Industrial User Survey or other questionnaire, or may be conducted separately under a program developed solely for MS4 purposes.

i. Screening for Industrial Stormwater Permitting

The permittee must continue to screen existing and new industrial facilities to assess whether they may be subject to an industrial stormwater general NPDES permit or have the potential to contribute a significant pollutant load to the MS4. The screening must be done on a routine basis, and in no case may screening of new facilities take place less often than once a year. Within 30 days after determining a facility may be subject to a DEQ-issued industrial stormwater permit, the permittee must notify the industrial facility and DEQ.

ii. Strategy to Reduce Pollutants from Industrial and Commercial Facilities

The permittee must, at minimum, review and update as appropriate the Industrial/Commercial Facilities Strategy developed under the previous permit term, include it in the SWMP Document directly or by reference. The Strategy must be posted on the permittee's website for public comment for a minimum of 30 days prior to finalization and incorporation into the SWMP Document, and include, at a minimum:

- (A) The facility types or activities, rationale, and priorities for entities that the permittee has determined may have high potential to discharge pollutants of concern to the MS4,
- (B) Inspection procedures, documentation standards, and frequency of inspections; and
- (C) Description of the assessment and tracking of compliance with municipal ordinances related to discharges to the MS4 at industrial and commercial facilities that are potential sources of pollutants in stormwater runoff.

iii. Commercial & Industrial Facility Inspection Staff Training

The permittee must ensure that staff responsible for inspecting and evaluating Commercial and Industrial facilities, evaluating compliance with municipal ordinances related to discharges to the MS4, or ensuring pollution prevention at facilities through inspections and/or provision of educational materials on stormwater management, are trained or otherwise qualified to conduct such activities, and training strategies, and frequencies for staff must be described in the SWMP Document.

Permit Requirements (continued)

Schedule A.3.a: MS4 Permit

iv. Tracking and Assessment

The permittee must maintain records of activities conducted to meet the requirements of the Commercial & Industrial Facilities program requirements and include a descriptive summary of their activities in the corresponding Annual Report, as well as relevant metrics or tracking measures. Each annual report should include a list of entities referred to DEQ based on permittee screening activities, a list of categories of facilities inspected, and an overview of the results of inspections.

This section of the SWMP includes the City’s industrial and commercial facilities strategy (Section 5.8.1) and BMPs (5.8.2.).

5.8.1 Industrial and Commercial Facilities Strategy

The primary goal of the industrial and commercial facilities program is to reduce pollutants in stormwater discharges to the MS4 from industrial and commercial sites. Commercial and industrial facilities have the potential to be a significant source of pollutants to the MS4. Some are required by their industrial classification to obtain coverage under the NPDES 1200-Z Industrial General Permit and others are not required to obtain coverage under a permit but may still be considered a potentially significant source of pollutants. The City of Eugene’s strategy for industrial and commercial facilities is a combination of administering 1200-Z permits locally as an Agent of DEQ and analyzing available information and coordinating with other programs to identify and prioritize certain facilities or sectors for disseminating best management practices resources, implementing source controls, conducting inspections, encouraging voluntary compliance, and utilizing escalating enforcement as necessary to achieve compliance with Eugene City Code.

1200-Z Permitted Facilities

Certain industries must obtain coverage under the 1200-Z Industrial General Permit on the basis of their primary Standard Industrial Classification (SIC) code or certify that nothing is exposed to stormwater (“No Exposure Certification”). Businesses with 1200-Z permits are a primary focus of Eugene’s industrial and commercial strategy as these sites have the largest potential to impact the MS4. Currently, Eugene acts as an Agent for DEQ for 1200-Z industrial stormwater permits within the Eugene urban growth boundary. An intergovernmental agreement outlines the City and DEQ’s respective responsibilities carrying out permit administration and compliance.

New businesses potentially needing to obtain a 1200-Z permit are identified based on a variety of sources including Industrial Wastewater Discharge permits, the Toxics Right-to-Know inventory, the Toxics Use and Hazardous Waste Reduction Clearinghouse, City of Eugene Fire Department records, the Oregon Labor Market Information System, referrals from other City of Eugene staff including the Permit and Information Center staff, and local news publications. If it is determined that a new business potentially needs to obtain a 1200-Z permit, a letter is sent to the business requiring them to submit an industrial stormwater discharge permit application to the City of Eugene. This letter is sent within 30 days via regular and certified mail, and DEQ is sent a copy as well.

Once a permit is issued, Eugene’s responsibilities include reviewing stormwater pollution control plans, reviewing stormwater discharge monitoring reports, reviewing action plans, inspecting sites, and being first responder for complaints and permit compliance. Inspections at newly permitted facilities are conducted within 24 months of receiving their permit. Additional inspections will be conducted if monitoring reveals excessive or abnormal benchmark exceedances, if instances of non-

compliance are identified, or if visual observations made by City staff or the public indicate a potential for pollutants to be released into the MS4. Site inspections are conducted as outlined in the Wastewater Division’s Industrial and Commercial Facility Stormwater Site Inspection Procedure.

Non-1200-Z Permitted Facilities

Industrial and commercial facilities not required to obtain 1200-Z permit coverage may still have the potential to contribute a significant pollutant load to the MS4 based on the quantity and nature of materials and processes onsite with exposure to stormwater. The strategy for addressing these facilities is a combination of several actions including: 1) identifying and prioritizing them, 2) providing sector-specific information about best management practices, and 3) conducting proactive site inspections, encouraging voluntary compliance, and utilizing escalating enforcement as necessary to achieve compliance with Eugene City Code.

1) Facility Identification and Prioritization

The identification and prioritization of facilities or sectors with the potential to contribute a significant pollutant load to Eugene’s municipal stormwater system is based on several factors, including:

- Reoccurring illicit discharge incidences from a particular sector (for example, grease hood cleaning practices)
- Visual observations during site visits associated with other programs, regulatory and voluntary such as the Wastewater Division’s Fats, Oils and Grease (FOG) program, Industrial Pretreatment program, and Ecobiz certification program (for example, the observation of an oil sheen, sediment, or waste material with the potential to leave the site)
- Local news publications
- Business advertising
- Concerned citizens
- Field observations from City staff in other programs (IDDE, erosion prevention)
- Professional organizations flagging sector-specific issues (Oregon ACWA, PNCWA)
- Metro area partners including the Eugene-Springfield Stormwater Special Operations Team
- Review of other municipalities’ industrial and commercial stormwater programs

In consideration of these factors, related historical information, and staff knowledge, the automotive sector has been identified as the highest priority commercial sector in Eugene for focused outreach and inspection over the next several years. In addition, by the end of the current permit term, staff will assign a relative priority for the remaining commercial sectors with potential for significant pollutant load to the MS4, for future outreach and inspections.

2) Sector-Specific Outreach

Stormwater educational materials specific to automotive businesses and other priority facilities and sectors will be developed or customized, as necessary, and distributed as appropriate. To-date, sector-specific outreach material has been distributed in Eugene to breweries, garden centers, carpet cleaners, pressure washers (including equipment rental businesses), new and used car lots, food service establishments, restaurant hood/vent cleaners, businesses that dispose of hazardous materials, and catch basin cleaning companies.

3) Inspections, Compliance and Enforcement

For the automotive sector, inspection goals will be established, an inspection checklist will be created, and proactive inspections of businesses will be initiated. Inspections will also continue

to be conducted at certain sites if stormwater monitoring, visual observations, or citizen complaints indicate that a particular business has the potential to significantly contribute to the pollutant load in the MS4. Site inspections are often collaborative involving staff from other related program areas including industrial pretreatment, fats, oils, and grease (FOG), illicit discharge detection and elimination (IDDE), and erosion prevention and construction site management programs. Working with a facility to improve their practices and achieving voluntary compliance with City Code, including the code requirements prohibiting anything but stormwater from being discharged to the MS4 (Eugene Code 6.446), is a primary goal. However, if voluntary compliance is not achieved, then escalating enforcement actions will be pursued including documented verbal warnings, written notices sent via certified mail, the issuance of civil penalties, and formal referral to the Oregon Department of Environmental Quality. Follow-up inspections are conducted as necessary to ensure that adequate control measures are in place and compliance with applicable requirements has been achieved.

Source Controls

For new development and re-development, ensuring compliance with Eugene Code source control requirements is another important element of the City's industrial and commercial facilities strategy. The purpose of source controls is to prevent stormwater pollution by eliminating pathways that may introduce pollutants into stormwater. Eugene City Code Section 9.6795 and the Stormwater Management Manual require certain source controls for the following site uses or characteristics:

- Fuel dispensing facilities and surround traffic areas
- Exterior storage of liquid materials
- Exterior storage of solid waste
- Stockpiling of certain bulk materials outdoors
- Material transfer areas
- Designated equipment or vehicle washing areas
- Disturbing property suspect or known to contain contaminants in the soil or groundwater
- New covered vehicle parking areas

5.8.2 Industrial and Commercial Facilities BMPs

The City's industrial and commercial facilities strategy is implemented primarily by the Public Works Wastewater, Maintenance, Administration, and Engineering Divisions. Wastewater Division staff are focused on sites that qualify for 1200-Z coverage and sites that are identified as a priority for educational outreach and inspections. Wastewater Division staff follow the Industrial and Commercial Facility Stormwater Site Inspection Procedure included in the SWMP as Appendix D. The following BMPs represent the industrial and commercial facilities elements of the SWMP:

- W1 Industrial Stormwater Management Program
- W2 Commercial Facilities Outreach and Inspection (new BMP, added October 2023)
- A1 Stormwater Education (Section 5.2)
- M1 Management of Illicit Discharges to the Municipal Stormwater System (Section 5.4)
- E4 Stormwater Development Standards (Section 5.6)

W1	Industrial Stormwater Management Program
Responsible Department/Division	Public Works/Wastewater Division
Description	Provide oversight of stormwater discharges from NPDES 1200-Z permitted industrial facilities, screen new businesses for those that may require permits, conduct inspections, provide technical assistance, review monitoring reports, and assist with enforcement. Screen new and existing industrial and commercial businesses to identify facilities that do not require a NPDES 1200-Z permit but may have the potential to contribute a significant pollutant load to the MS4. In coordination with other SWMP BMPs, implement Industrial and Commercial Facilities strategy for non-permitted sites.
Tasks	1. Screen existing and new businesses for permit applicability 2. For 1200-Z permitted sites: • Continue to act as 1200Z Agent for DEQ • Review Stormwater Pollution Control Plans • Provide technical assistance • Conduct site inspections • Review Discharge Monitoring Reports • Utilize escalating enforcement as necessary • Manage permit files 3. For non-1200-Z permitted sites: • Continue to coordinate with other program staff including IDDE, FOG, Wastewater Industrial Pretreatment, Building and Permit Services, and Stormwater Education staff to identify and address sector-specific issues through targeted education and outreach, inspections, and enforcement of relevant Eugene Code including EC 6.446.
Measurable Goals	• Screen new businesses at least annually for those requiring a permit. • Conduct site inspections on 20% of permitted facilities annually. • Create a geodatabase of local commercial and industrial businesses for ease of screening new and existing facilities by December 1, 2023. • Review and update, as necessary, Industrial and Commercial Facilities Strategy and Industrial and Commercial Facility Site Inspection Procedure by December 1, 2023.
Tracking Measures	• Number of new businesses identified as needing a 1200-Z permit. • Number and percentage of total permitted facilities inspected. • Number by sector of non-permitted businesses contacted or visited. • Sector-specific education and outreach topics identified for follow-up. • Track number of work orders pertaining to industrial site-related illicit discharges, number of verified illicit discharges, and enforcement actions. (Note: illicit discharge data comprehensively reported in M1).
References	• Industrial and Commercial Facility Site Inspection Procedure (Appendix D) • Industrial Source Control Program web page

W2	Commercial Facilities Outreach and Inspection
Responsible Department/Division	Public Works/Wastewater Division
Description	Conduct routine on-site inspections of certain commercial sectors or activities for stormwater best management practices. Coordinate with stormwater education program (BMP A1) to provide sector-specific educational materials to supplement inspections and encourage voluntary compliance with City Code and stormwater best management practices.
Tasks	1. With an initial focus on the automotive sector, identify and prioritize additional commercial sectors and individual businesses with the potential to significantly impact stormwater quality. 2. Determine standards to assess and metrics to evaluate compliance. 3. Develop an inspection checklist. 4. Develop and distribute sector-specific educational materials. 5. Conduct inspections to assess compliance with applicable Eugene Code regulations and stormwater best management practices. 6. Utilize an escalating enforcement approach if voluntary compliance is not achieved.
Measurable Goals	• Review annually and update, as necessary, geodatabase that identifies existing sectors and businesses that have the potential to contribute pollutants of significant nature or quantity to the MS4. • For the automotive sector, prioritize businesses for outreach and inspection, develop an inspection checklist, and create or update, as necessary, sector-specific educational materials by December 1, 2024. • Establish inspection goals (e.g., number of businesses per year) and initiate on-site inspections for “high priority” sites by December 1, 2024. • For the remaining (non-automotive) commercial sectors and businesses in the geodatabase, develop a tiered, priority based ranking system based upon the sites’ potential to adversely impact water quality and assign a priority for future outreach and inspections by September 30, 2026.
Tracking Measures	• Review and updates to geodatabase. • Number of sites that were sent sector specific BMP outreach materials. • Number of educational site visits and compliance inspections conducted at sites within the priority commercial sector(s). • Number and type of formal enforcement actions issued by the City. • A descriptive summary of the program’s activities and inspection results will be included in the annual MS4 Permit Report.
References	• Industrial and Commercial Facility Site Inspection Procedure (Appendix D) • Industrial Source Control Program web page

5.9 Stormwater Planning and Capital Improvements

Permit Requirements

Schedule A.3.h: MS4 Permit

The permittee must continue to consider the impacts of policy, capital improvements, and retrofit projects on MS4 discharges to receiving waters, considering the goals and proposed actions described in the previous permit's Hydromodification Assessment and Stormwater Retrofit Strategy reports.

This section of the SWMP includes the City's stormwater planning and capital improvement BMPs.

5.9.1 Stormwater Planning and Capital Improvements BMPs

Stormwater planning and capital improvement projects are managed by the Engineering Division of the Public Works Department but involvement in both the long-term master planning and in the identification and implementation of capital improvement projects is broad. The following BMP represents the stormwater planning and capital improvements BMPs:

E1 Stormwater Planning and Capital Improvements

Several operations and maintenance programs inform and contribute stormwater system knowledge and ideas to stormwater planning and capital improvement efforts such as updating the City's Stormwater Basin Master Plans, identifying and prioritizing capital project needs via the biannual Capital Improvement Program process, and providing input and review of capital project plans and specifications. Mapping and data management provides essential GIS data and mapping services in support of planning and capital improvements. Implementation of capital improvements, including stormwater retrofit projects, helps inform future updates to the Stormwater Management Manual. Coordination among program staff regarding regulatory drivers for certain pollution reduction capital projects including stormwater retrofit projects and projects that address TMDL pollutants is a regular occurrence. BMPs that inform, contribute to, and support stormwater planning and capital improvements include:

- E4 Stormwater Development Standards (Section 5.6)
- M5 Public Stormwater System Cleaning Program – Piped System (Section 5.7)
- P4 Public Vegetated Stormwater Facility Maintenance (Section 5.7)
- P6 Public Stormwater System Maintenance – Open Waterways (Section 5.7)
- E3 Stormwater System Mapping and Data Management (Section 5.10)
- E1 Permit Management and Reporting (Section 5.11)

E1	Stormwater Planning and Capital Improvements
Responsible Department/Division	Public Works/Engineering Division
Description	Continue to implement the Stormwater Capital Improvement Program (CIP), including design and construction of projects identified in the City's Stormwater Basin Master Plan (Basin Plan). The Basin Plan is one of the main sources of capital projects that comprise the City's CIP. CIP projects also originate from a list of current system maintenance and rehabilitation needs, area-specific planning studies, coordination with other city projects, and partnership or funding opportunities. Stormwater capital projects from these various sources are compiled, scored using established prioritization criteria, ranked, and then selected for implementation. An update to the Basin Plan will incorporate potential strategies identified in the 2014 Hydromodification Assessment and will inform an updated Retrofit Strategy and updated stormwater development standards (BMP E4).
Tasks	1. Continue to implement the stormwater CIP, utilizing documented prioritization criteria that include the degree to which a project addresses water quality improvement and TMDL pollutant reduction. 2. Maintain GIS coverage of constructed capital improvement projects including location, project or facility type, and drainage area. 3. Document implementation and outcomes of the 2014 retrofit strategy and hydromodification assessment. Review and update as appropriate. 4. Update Stormwater Basin Master Plan and conduct outreach to solicit community input. Incorporate updated retrofit and hydromod. strategies. 5. Continue to assess flood control, transportation, and other infrastructure projects during planning stages to identify and mitigate potential negative impacts on or to enhance benefits to water quality of receiving streams.
Measurable Goals	• Implement Stormwater CIP projects including at least four water quality retrofit projects over the 5-year permit term. • Complete assessment of outcomes related to stormwater retrofit strategy and hydromodification assessment by December 1, 2024. Review and update strategies as appropriate. • Complete update to the Stormwater Basin Plan by December 1, 2026.
Tracking Measures	• Track the number, type, watershed location, and total drainage area of stormwater capital improvement projects, including retrofit projects and off-site LID/GI mitigation projects (BMP E4), constructed for water quality. • Document progress related to retrofit/hydromodification assessment review and Stormwater Basin Master Plan update.
References	• Stormwater Basin Master Plans • Retrofit Strategy • Hydromodification Assessment • Capital Improvement Program (CIP)

5.10 Mapping and Data Management

Permit Requirements

Schedule A.3.c.i.: MS4 Permit

MS4 Map

(A) MS4 Map and Digital Inventory

The permittee must continue to maintain and update a current map of their MS4. The MS4 map may be in the form of a web-based or digital inventory, and must include the location of outfalls and an outfall inventory, conveyance system and structural stormwater control locations, and chronic illicit discharges as applicable ... as well as annual dry-weather priority screening sites

(B) Outfall Inventory

The permittee must maintain inventories of all the known outfall locations, owned or operated by the permittee...

(C) Conveyance System and Stormwater Control Locations

The permittee must continue to maintain maps of the MS4 collection system and all known structural stormwater controls.....

(D) Chronic Illicit Discharges

The permittee must include the location(s) of any known chronic illicit discharge(s), as necessary for ongoing investigations or repeat/recurring issues in dense areas or commercial districts, for example, as applicable.

This section of the SWMP includes the City's mapping and data management BMPs.

5.10.1 Mapping and Data Management BMPs

The City's mapping and data management is conducted primarily by the Public Works Engineering Division, in collaboration with information technology staff in other divisions in the Public Works and Planning and Development Departments:

E3 Mapping and Data Management

All or most other BMPs contribute to or utilize GIS and mapping data (e.g., to investigate potential illicit discharges, to analyze land use and other data to identify potential high pollutant source areas, and to estimate runoff volumes to size stormwater facilities). Just some of the BMPs contributing to or dependent upon mapping and data management include:

- M1 Management of Illicit Discharges to the Municipal Stormwater System (Section 5.4)
- E4 Stormwater Development Standards (Section 5.6)
- M6 Regulation of ... Private Underground Stormwater Facilities (Section 5.6)
- P6 Private Vegetated Stormwater Facility Maintenance Program (Section 5.6)
- M5 Public Stormwater System Cleaning program – Piped System (Section 5.7)
- P4 Public Vegetated Stormwater Facility Maintenance (Section 5.7)
- P5 Public Stormwater System Maintenance – Open Waterways (Section 5.7)
- W1 Industrial Stormwater Management Program (Section 5.8)
- W2 Commercial Facilities Outreach and Inspection (Section 5.8.)
- E1 Stormwater Planning and Capital Improvement Projects (Section 5.9)

E3	Stormwater System Mapping and Data Management
Responsible Department/Division	Public Works/Engineering Division
Description	Support on-going implementation of the stormwater program by providing mapping, GIS data, and application development and support services. Maintain up-to-date inventories and maps of the natural and constructed features of the City's stormwater system. Include in the inventories and maps of public and private water quality, flow control, and flood control facilities. Develop and integrate asset inventory data and geographic information system (GIS) systems which describe and map the conveyance system, water quality attributes and related natural resource information. Integrate information generated through other BMPs such as E1 and E4 which create or modify system attributes.
Tasks	1. Continue to solicit input to identify where further stormwater system data may be needed for program effectiveness and adaptive management. 2. Update digital stormwater system inventory and GIS map layers quarterly. 3. Develop, upgrade, and maintain new software applications as needed which make system information available and more useful to staff. 4. Update printed stormwater infrastructure map sets bi-annually. 5. Support implementation of Stormwater Development Standards (E4), help to ensure that data management needs are identified, and protocols established for documenting appropriate information to ensure that operations and maintenance, inspection and enforcement, and BMP effectiveness objectives are met. 6. Track implementation of Capital Improvement Projects by helping to ensure documentation of location, type, and other attributes of stormwater capital projects for purposes of evaluating their effectiveness and tracking and reporting progress.
Measurable Goals	• Enter 95% of all newly constructed public and private stormwater system features into inventory databases and GIS within six months of final construction approval. • Survey GIS and data application users every two to three years to gauge satisfaction with GIS/data application support services. • Review and update as necessary, data development and maintenance procedures for public and private stormwater facilities.
Tracking Measures	• Track mapping and database update activities. • Track GIS and data application survey results including the % of respondents who rate the GIS/data systems as satisfactory or better. • Track updates to data development and maintenance procedures for public and private stormwater facilities.
References	• Mapping and Data Hub for downloading publicly available GIS data and, upon scrolling down, to access "EUG Maps" to view data, create maps, and print.

5.11 Permit Management

Permit Requirements

Schedule A.2: MS4 Permit (Permit Compliance)

The permittee is responsible for permit compliance related to its permit coverage area, or where this permit requires the specific permittee to take an action...

Schedule A.2.f: MS4 Permit (Adaptive Management)

The permittee must continue to follow an adaptive management approach developed under the previous permit iteration in order to assess and modify, as necessary, any or all existing SWMP components and adopt new or revised SWMP components to achieve reductions in stormwater pollutants to the MEP.

Schedule B.3: MS4 Permit (Annual Reporting)

No later than December 1 each year, beginning in 2021, the permittee must submit Annual Reports to DEQ in paper and electronic format until DEQ requires the permittee to submit it electronically only via EDMS/Your DEQ Online. The reporting period for the Annual Report is from July 1 of the previous calendar year through June 30 of the current year (for example, July 1, 2021 through June 30, 2022). Reporting periods for subsequent Annual Reports are specified in Table 3 below. The permittee must make all Annual Reports available to the public, including any required documents attached to the Annual Report through the permittee's-maintained website.....

Schedule B.4: MS4 Permit (Renewal Application)

No later than 180 days prior to permit expiration, the permittee must submit a permit renewal application package to support proposed modifications to their program and stormwater control measures, if any. An electronic copy must also be made available on the permittee's website. The application package must include an evaluation of the adequacy of the permittee's program and stormwater control measures in reducing pollutants in discharges from the MS4 to MEP, and the conclusions of the annual adaptive management process developed under this permit. The application package must contain:

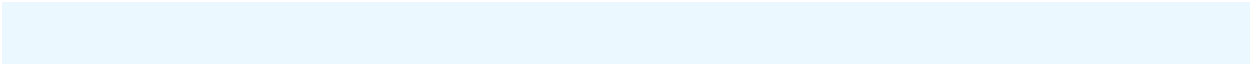
This section of the SWMP includes the City's permit management BMPs.

5.11.1 Permit Management BMPs

Management of the MS4 permit is the responsibility of the Public Works Engineering Division, however it requires participation from and coordination with staff and managers in other Divisions of Public Works and other Departments including Planning and Development and Central Services. Stormwater program management is described in Section 1.4 and illustrated in Table 1-2. The following BMP represents the permit management element of the SWMP:

E5 Permit Management

E5	Permit Management & Reporting
Responsible Department/Division	Public Works/Engineering
Description	Administration of the City of Eugene’s NPDES MS4 permit compliance effort including permit program coordination, program evaluation and adaptive management, annual reporting, related public involvement and participation, and timely submittal of all permit-related deliverables.
Tasks	1. Coordinate with staff in all City departments and divisions that administer SWMP BMPs and conduct water quality monitoring to review program commitments, gather tracking data, and, where appropriate, assist with program evaluation, additional goal setting, BMP enhancements, and SWMP or monitoring plan changes. 2. Coordinate with other public entities as appropriate for effective MS4 program implementation. 3. Complete and submit all assessments, evaluations, reports, data, and other deliverables as required by the MS4 permit. 4. Track and document changes to SWMP and Monitoring Plan 5. Maintain up-to-date web site for MS4 permit program including current SWMP, Monitoring Plan, annual reports, and monitoring data. 6. Conduct appropriate public involvement and participation related to MS4 permit management and reporting. May include public notices, web site postings, and presentations to elected officials.
Measurable Goals	• Maintain current list of “BMP and Stormwater Management Team Leads” • Meet at least annually with Lane County to coordinate on MS4 permit program implementation in areas of mixed jurisdictional boundaries. • Ensure completion and submittal of all SWMP Document requirements and associated deadlines summarized and listed in Schedule A, Table 1. • Ensure completion and submittal of updated Monitoring Plan, annual reports, analytical data, permit renewal submittal, updated 303(d) pollutant evaluation, TMDL pollutant load reduction evaluation, and updated TMDL pollutant reduction benchmarks per Schedules B and D. • Develop a protocol and template for tracking and documenting changes to SWMP and Monitoring Plan • Update MS4 permit web site at least once per year to include the most recent reporting year’s annual report and water quality monitoring data.
Tracking Measures	• Document “BMP and Stormwater Management Team Leads” • Track meeting dates and topic areas for coordination with Lane County • Document submittal of all permit-related deliverables including assessments, evaluations, annual reports, and renewal application. • Document rationale and supporting information for changes made to SWMP and Monitoring Plan. • Document dates annual reports are published on City’s MS4 web site. • Document date, nature, and target audience(s) for public involvement and participation efforts related to MS4 permit management and reporting including for draft SWMP, Monitoring Plan, and Reports.
References	• Municipal Stormwater Permit web page



Appendices

[Appendix A Stormwater-Related Provisions and Authority](#)

[Appendix B City of Eugene Stormwater System Map](#)

[Appendix C Adaptive Management Evaluation Tool](#)

[Appendix D Industrial and Commercial Facility Stormwater Site Inspection Procedure](#)

Appendix A: Stormwater-Related Provisions and Authority

STORMWATER RELATED PROVISIONS AND AUTHORITY

(Current Through October 1, 2023)

Eugene City Charter, Municipal Code, and Resolution

Eugene Municipal Charter 2002, Chapter II, Section 4	EC 6.451 (Admin Regulations and Methodology)
EC 2.018 (Authority to Impose Administrative Civil Penalty)	EC 6.501 – 6.596 (Industrial Pretreatment)
EC 2.019 (Administrative Authority)	EC 6.600 – 6.615 (Stormwater Service and Facility Maintenance)
EC 2.021 (Appeal Procedures)	EC 6.625 – 6.645 (Erosion Prevention)
EC 2.582 (Modification, Compromise or Cancellation of Claims)	EC 6.805 (Littering in Waterways)
EC 2.1996 (Administrative Civil Penalty)	EC 6.810 (Prohibited Deposits in Millrace)
EC 6.005 – 6.115 (Nuisances)	EC 6.990 – 6.995 (Penalties)
EC 6.340 – 6.380 (Hazardous Substance Discharge)	EC 7.010 (Definitions for Chapter 7)
EC 6.401 (Intention to Operate Sewerage Systems)	EC 7.143 (Wastewater Sewer Sys. & Stormwater Mngmnt Fac.)
EC 6.406 (Definitions for EC 6.401 – 6.645)	EC 7.700 – 7.740 (Systems Development Charges)
EC 6.411 (Ratemaking)	EC 9.0200 – 9.0280 (Enforcement and Penalties)
EC 6.416 – 6.436 (Charges)	EC 9.4700 – 9.4980 (Waterway Protections)
EC 6.441 (Locations Outside of City)	EC 9.6705 – 9.6709 (Development in Flood Plains)
EC 6.446 (Discharge of Foreign Matter)	EC 9.6790 – 9.6797 (Stormwater Development Standards)
	Resolution 5100 – Stormwater SDC Methodology
	Resolution 5383 – SDC Policy for Conversion of Buildings from Commercial to Residential

Administrative Orders

Rules:

Admin Order 58-03-01-F (Erosion Prevention Rule)
Admin Order 58-06-12-F (Stormwater Service Methodology)
Admin Order 58-09-07-F (Water Quality Overlay Zone)
Admin Order 58-11-09-F (Stormwater System Rule)
Admin Order 58-14-01-F (Stormwater Management Manual)
Admin Order 58-23-02-F (Industrial Pretreatment Rule)

Fees:

Admin Order 58-94-03-F (Stormwater Service Chrg. Appeal Fee)
Admin Order 58-00-16-F (Open Waterway Exempt. Permit Fees)
Admin Order 58-11-04-F (Industrial Pretreatment Program Fees)
Admin Order 58-23-19-F (Stormwater User Fees)
Admin Order 58-23-20-F (Wastewater User Fees)

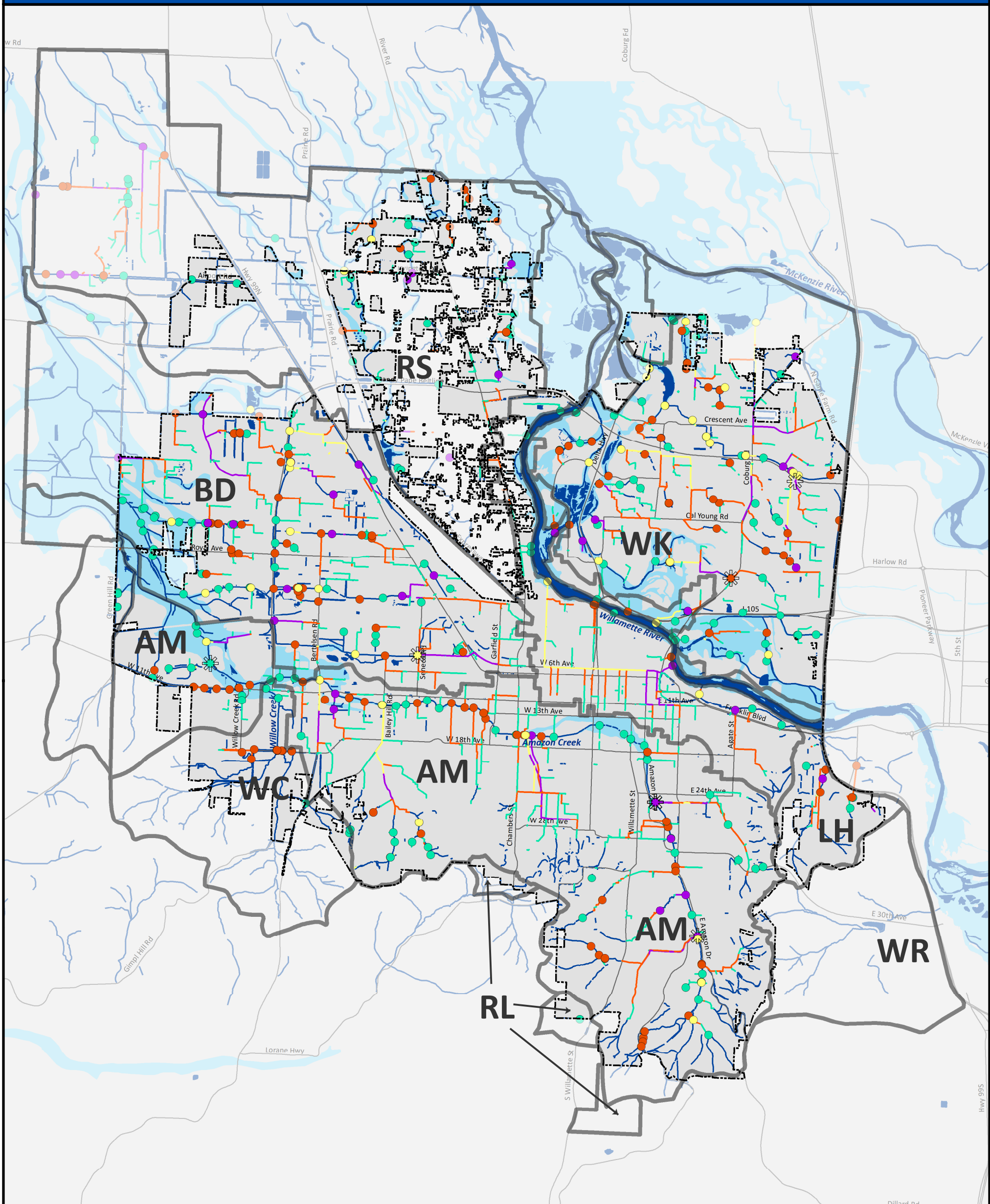
(Admin Orders adjusting Stormwater and Wastewater System Development Charges for inflation are generally adopted annually. Reference to those Orders has been omitted from this document for brevity, however, copies can be requested by contacting Therese Walch.)

Administration:

Admin Order 58-99-13 (Authority delegated to PW Executive Director to sign NPDES documents)
Admin Order 58-99-17 (Authority delegated to Wastewater Treatment Division Director to sign NPDES documents)
Admin Order 58-00-20 (Authority delegated to City Engineer to administer stormwater, erosion prevention, open waterway programs)
Admin Order 58-00-21 (Authority delegated to PW Eng. Div. Development Review Manager to administer open waterway program)
Admin Order 58-00-28 (Authority delegated to PW Eng. Div. Development Review Manager to administer erosion prevention program)
Admin Order 58-03-06 (Approving Stormwater Basin Master Plans -- *amended by 58-14-03*)
Admin Order 58-09-13 (Industrial pretreatment delegating of duties under industrial pretreatment program)
Admin Order 58-12-14 (River Road-Santa Clara Stormwater Basin Master Plan)
Admin Order 58-14-03 (Amends 58-03-06 - Stormwater Basin Master Plan Table 5-3 in Vol. 1 – *amends 58-03-06*)
Admin Order 58-14-06 (Design Standards for Stormwater Facilities in Public Improvement Projects)
Admin Order 58-16-01 (Public Improvement Design Standards Manual)

Appendix B: City of Eugene Stormwater System Map

City of Eugene Stormwater System



Outfall Diameter	Diameter of Piped Stormwater		Dry Weather Field Screening
● 24" - 33"	— 24" - 33"	—	Open Waterways
● 36" - 48"	— 36" - 48"	—	Rivers and Ponds
● 52" - 60"	— 52" - 60"	—	100-yr Floodplain
● 62" - 90"	— Greater Than 60"	 	Eugene City Limits

Note: Lane County Stormwater pipes and outfalls are not shown.

- Basin Names
- RS - River Rd-Santa Clara
 - WR - Willamette River
 - WK - Willakenzie
 - BD - Bethel-Danebo
 - AM - Amazon
 - WC - Willow Creek
 - LH - Laurel Hill
 - RL - Ridgeline

N

W

E

S

0

1/2

1 Mile

City of Eugene
Mapping and Data Team
September 2022

Figure B-1

Appendix C: Adaptive Management Evaluation Tool

Annual Adaptive Management BMP Evaluation Tool

BMP #:	BMP Title:
Date of Evaluation:	<i>Instructions: BMP Leads or otherwise responsible staff person will answer the following questions for each BMP annually, after the reporting period has ended, and before the annual report is generated.</i>
Evaluator Name, Title:	<i>Adaptive Management defined: "A structured, iterative process designed to refine and improve stormwater programs over time by evaluating results and adjusting actions on the basis of what has been learned."</i>

<i>Were the BMP measurable goals (or related milestones) attained?</i>
<i>For BMPs with multi-year implementation, were milestones or timelines met?</i>
<i>If a BMP measurable goal or milestone was not met, describe circumstances why (including external influences beyond your control), what actions were taken, and how progress will be made to meet and/or exceed the goal in the future. Consider policy, public input, weather, coordination, etc.</i>
<i>Are you considering new technologies related to this BMP that could improve its implementation, and what are they? Are you aware of limitations in acquiring/implementing this technology?</i>
<i>Are there improvements that can be made to this BMP that may increase its effectiveness in removing pollutants in stormwater? Are there efficiencies that can be made (cost, labor, materials, etc.)?</i>
<i>Do you anticipate any changes in available resources that are necessary to attain this BMP in the future? Consider staff, resources, budget/funding, equipment, etc.</i>

This BMP Evaluation Tool is for use in the City of Eugene's annual stormwater program adaptive management process.

Is there opportunity for the effectiveness of this BMP to increase as a result of increased outreach/education efforts? If so, describe how.

Has information/data obtained through inspection, operation, or maintenance activities been acquired that may influence how the effectiveness or efficiency of this BMP could be improved?

Were there pilot studies or data collected through the stormwater monitoring program that provides you with information about how effective this BMP is? What do these studies/data suggest? Are there data trends or anomalies worth consideration?

Have any public involvement events, open comment periods, or outreach effectiveness studies occurred that suggest a need to revise or change implementation of this BMP?

Is there a need to propose any changes to the BMP description, tasks, measurable goals or tracking measures? If so, indicate proposed change and explain.

Appendix D: Industrial and Commercial Stormwater Site Inspection Procedure

CITY OF EUGENE – WASTEWATER DIVISION Procedure

Subject:	Industrial and Commercial Facility Stormwater Site Inspection	Document No:	1869
Reviewed By:	Jon Wilson	Original Date:	6/12/12
Approved By:	Management Team	Date Approved:	4/19/23

Purpose

The purpose of this procedure is to describe how to conduct inspections at industrial facilities to ensure compliance with Oregon Department of Environmental Quality National Pollutant Discharge Elimination System (NPDES) MS4 and 1200-Z permits, Eugene City Code Chapter Six, and the City of Eugene's Municipal Separate Storm Sewer System NPDES Discharge Permit.

Safety Requirements

CAUTION: Every industrial facility has different hazards and it is important to be aware of your surroundings. Common hazards include forklift and vehicle traffic, uneven ground, overhead dangers, and chemical exposures.

The following Personal Protection Equipment (PPE) must be brought to every inspection*:

- Safety Shoes unless otherwise required by the Industrial/Commercial Facility
- Safety Glasses
- Hearing Protection
- Hard Hat
- Safety Vest
- Appropriate Clothing (long pants, nothing that could get caught in machinery, etc.)

*Sites that have previously been inspected will have required PPE and other safety considerations listed on the inspection report. As safety considerations at industrial sites are subject to change without notice, you must ensure that the PPE listed above is in proper working order, easily accessible while conducting the inspection, and worn if required or otherwise determined to be necessary. If a facility is also subject to an industrial pretreatment wastewater discharge permit, safety reports may be reviewed for any changes or additional PPE.

Equipment and Supplies

The following must be brought to every inspection:

- Cell phone, tablet, digital camera, or similar device
- Industrial Stormwater Inspection Report Form
- City of Eugene Identification
- Personal Protective Equipment

Identifying Industrial and Commercial Facilities with Potential Stormwater Concerns

A Prioritizing Industrial Facilities with NPDES Permit Coverage for Inspection

1. Inspect 20% of NPDES permitted facilities each year.
2. The following will be taken into consideration when determining which NPDES permitted facilities are inspected each year:
 - a. Known changes to industrial processes, material storages, or stormwater conveyance patterns.
 - b. Facility contact changes
 - c. Elapsed time since previous inspection

- d. Facilities with significant or unexplained changes to pollutant concentrations discharged when compared to historic self-monitoring results
- e. Sites that do not provide documentation demonstrating that corrective actions or additional stormwater controls have been completed or implemented.

B Identifying New and Existing Industrial Facilities to Determine Need for NPDES Permit Coverage

1. Permit Information Center forwards notifications for every permitted project meeting that include the following:
 - a. Applicant Name
 - b. Project Name
 - c. Project Log Number
 - d. Address
 - e. A list of all departments potentially affected
 - f. Zoning information
 - g. A link to any meeting materials submitted and the application
2. Local media publications
3. Eugene Springfield Fire Department's Hazardous Materials Database
4. City of Springfield Pretreatment Discussions
5. New NPDES permit applications received
6. Geodatabase of industrial and commercial sites
7. Aerial photography review

C Identifying Commercial Sites and Sectors in need of Targeted Stormwater Outreach and Inspection

1. Patterns of illicit discharge complaints received
2. Suggestions from partner agencies
3. Stormwater monitoring results demonstrate a need
4. Length of time since last outreach effort
5. Review of media publications
6. Concerns identified by the City's Permit Information Center
7. Concerns raised by other regulatory agencies

Inspection Procedure for Industrial Facilities with NPDES Permit Coverage

A Prior to Inspection

The following must be completed prior to conducting the site inspection:

1. File Review:
 - A. Monitoring Table – Review analytical monitoring requirements (statewide benchmarks, sector specific requirements, impairment pollutants)
 - B. NPDES Permit (Re)Application Materials – Review contact information, standard industrial classification, outfall/monitoring point location, and receiving stream
 - C. Review SWPCP – Review general location map, site map, potential pollutants, outfalls, monitoring locations, site controls, spill prevention and response procedures
 - D. Previous Inspection Reports – review previous inspection reports for instances of non-compliance and issues of concern
 - E. DMRs – Review DMRs for benchmark exceedances, impairment pollutant limit violations, anomalies
 - F. Correspondence – Review correspondence related to site modifications, benchmark exceedances, impairment pollutant limit violations, issues of concern, Tier 1 & 2 reports, etc.
2. Gather Equipment
 - A. Industrial Stormwater Inspection Report Form
 - B. Site-specific paperwork
 - C. City of Eugene Identification
 - D. Personal Protective Equipment

B Onsite Paperwork Review and Office Discussion

1. Ask Questions to Determine if:
 - A. There have there been any changes to operations onsite
 - B. There have there been any changes to materials used onsite
 - C. There have there been any changes regarding how materials are stored
 - D. There have been any reportable spills or other releases
 - E. The facility contact has any questions or concerns related to stormwater issues
2. Ensure the following documents are onsite and current:
 - A. SWPCP and Annual Review – Record dates of SWPCP copy (onsite)
 - B. Analytical Monitoring – Record dates of benchmark exceedances and impairment pollutant limit violations since last DMR submittal and ensure proper documentation
 - C. Monthly Visual Inspections – Record dates of visual inspection since last DMR submittal
 - D. SWPCP Training Records – Review SWPCP training materials and records for the previous three years

C Interior Visual Inspection

1. Interior process areas will be inspected to determine the potential for unpermitted discharges or evidence of material track-out, which could result in additional pollutants being released to the City's stormwater conveyance system
2. Interior material storage areas will be inspected to ensure permit compliance and evaluate the potential for these materials to impact stormwater discharges from the site.
3. Document the names of materials stored onsite that have the potential to adversely impact stormwater quality.

D Exterior Visual Inspection

1. Inspect the following areas for evidence of staining, spills, leaks, non-stormwater discharges, material tracking, and other indications of stormwater contamination:
 - A. Surfaces discharging to the stormwater conveyance system
 - B. Stormwater Catch Basins and Similar Structures
 - C. Stormwater Conveyance System
 - D. Stormwater Outfalls and Monitoring Locations
 - E. Raw, Final, Material Processing, and Waste Material Storage Areas
2. Ensure site controls listed in SWPCP are adequate and being followed
3. Ensure compliance with sector specific requirements

E Follow-Up

1. Send Inspection Report and enforcement documentation soon as practicable.
2. If voluntary compliance is not achieved, the City of Eugene and DEQ's enforcement guidance will be consulted to determine the appropriate course of action, which could include the issuance of a civil penalty and referral to the DEQ's Office of Compliance and Enforcement..

Inspection Procedure to Determine NPDES Permit Applicability

A Prior to Inspection

1. Research Industrial Facility:
 - A. Utilize internet and other electronic resources to determine the nature of the business conducted at the industrial facility (business website, Oregon Labor Market Information System, news publications, Eugene/Springfield Fire Department eLOG Database, etc.)

- B. View aerial photography and ground truth the business address to determine if materials are exposed to stormwater and if there is an indication of a point-source stormwater discharge from the site.
2. If stormwater is exposed to materials that are assumed to be associated with an industrial activity, send notification to the business that a NPDES Industrial Stormwater Discharge Permit Evaluation Inspection is required.
 - A. Schedule inspection when contacted.
 - B. If the business fails to contact the City within thirty days, send a second notice.
 - C. If the business fails to contact the City within thirty days after a second notice, the City will attempt to contact the business by telephone.
 - D. If a business is not able to be contacted by telephone, an unannounced permit evaluation inspection will be conducted.
 - E. If entry to a site is denied, a certified letter will be sent requiring the business to apply for a NPDES industrial stormwater discharge permit.
3. Gather Equipment
 - A. Review Industrial/Commercial Stormwater Inspection Form and other site-specific paperwork
 - B. City of Eugene Identification
 - C. Personal Protective Equipment

B Onsite Office Discussion

1. Identify the materials stored, used, and produced in addition to the services provided at the site
2. Determine if the owner/operator is aware of the ultimate discharge location of their stormwater runoff

C Interior Visual Inspection

1. Interior process areas will be inspected to determine the potential for unpermitted discharges or evidence of material track-out, which could result in additional pollutants being released to the City's stormwater conveyance system.
2. Contact other regulatory programs in the event potential concerns are identified related to their areas of focus.

D Exterior Visual Inspection

1. Determine if there is a point-source discharge from the site that eventually discharges to surface waters.
2. If there is a point-source discharge from the site, determine if the business qualifies or will be able to qualify for a No Exposure Certification by determining if any of the following are or have the potential to be exposed to stormwater:
 - A. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water
 - B. Materials or residuals on the ground or in storm water inlets from spills/leaks
 - C. Materials or products from past industrial activity
 - D. Material handling equipment (except adequately maintained vehicles)
 - E. Materials or products during loading/unloading or transporting activities
 - F. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants)
 - G. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers
 - H. Materials or products handled/stored on roads or railways owned or maintained by the discharger
 - I. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])
 - J. Application or disposal of process wastewater (unless otherwise permitted)
 - K. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow
 - L. Storm resistant shelters with unsealed zinc or copper roofing materials

E Follow-Up

1. If a NPDES Industrial Stormwater Discharge Permit is required, send notification to the business and the Oregon Department of Environmental Quality within thirty (30) days.
2. If a NPDES Industrial Stormwater Discharge Permit is not required, send notification to the business as soon as practicable.

Inspection Procedure for Non-NPDES Permitted Commercial Facilities

A Prior to Inspection

1. Develop a geodatabase containing all known business operating within the City of Eugene's Urban Growth Boundary.
Develop a hierarchical ranking system* based on a site's perceived potential to contribute to the pollutant load within the City of Eugene's municipal separate storm sewer system and use this ranking system to determine which sites or sectors are provided outreach/educational materials and inspected each year.
2. Provide outreach and education to all sites within a given industrial or commercial sector, and conduct follow-up inspections to ensure that best management practices identified in the provided materials are being followed.
3. Gather Equipment
 - A. City of Eugene Identification
 - B. Industrial/Commercial Inspection Form
 - C. Sector BMP Guidance Materials (if applicable)
 - D. 1200-Z NPDES Permit No Exposure Certification Form
 - E. Personal Protective Equipment

*While the nature of the pollutants potentially discharged are such that these sites wouldn't necessarily be considered a high priority, the City of Eugene's Industrial Pretreatment Program has an ongoing Food Service Establishment inspection program to address Fats, Oils, and Grease (FOG) in both the wastewater and municipal separate storm sewer systems.

B Onsite Office Discussion

1. Determine if there are any non-permitted discharges to the City of Eugene's municipal separate storm sewer system (MS4)
2. Identify the materials stored, used, and produced in addition to the services provided at the site

C Interior Visual Inspection

1. Material storage and process areas will be inspected to determine the potential for unpermitted discharges to the stormwater conveyance system.
2. Contact other regulatory programs in the event potential concerns are identified related to their areas of focus.

D Exterior Visual Inspection

1. Determine if there is a point-source discharge from the site that ultimately discharges to surface waters.
2. If there is a point-source discharge from the site, determine if any of the following are or have the potential to be exposed to stormwater:
 - A. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water
 - B. Materials or residuals on the ground or in storm water inlets from spills/leaks
 - C. Materials or products from past industrial activity
 - D. Material handling equipment (except adequately maintained vehicles)
 - E. Materials or products during loading/unloading or transporting activities
 - F. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants)
 - G. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers

- H. Materials or products handled/stored on roads or railways owned or maintained by the discharger
 - I. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])
 - J. Application or disposal of process wastewater (unless otherwise permitted)
 - K. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow
 - L. Storm resistant shelters with unsealed zinc or copper roofing materials
3. If any of the items listed above have the potential to be exposed to stormwater, determine if they have the potential to contribute a significant pollutant load to the City of Eugene's MS4.
4. Provide sector specific technical assistance and ensure Best Management Practices are being followed.

E Follow-Up

If it is determined that activities at a commercial facility have the potential to contribute a significant pollutant load to the MS4, a request for corrective action letter identifying the issue and appropriate response will be sent via certified mail as soon as practicable. If voluntary compliance is not achieved the matter will be forwarded to the City of Eugene's Stormwater Enforcement Team, who's role it is to determine whether to pursue further enforcement measures, including civil penalties, in accordance with the authority granted by Chapter 6 of the Eugene Code.