



**2024-2025  
Annual Report**

for  
National Pollutant Discharge Elimination System (NPDES)  
Municipal Separate Storm Sewer System (MS4)  
Permit Compliance  
Permit #101348

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**Oak Lodge Water Services  
October 2021 MS4 Permit  
2025 ANNUAL REPORT REQUIREMENTS**

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## 1. Background

The Board of Directors of Oak Lodge Sanitary District (OLSD) created a Surface Water Management program with the adoption of Ordinance 1001 in May of 1993. The purpose of the Surface Water Management Program is to:

- prevent pollutants from entering rivers, lakes, and streams;
- maintain and/or improve water quality; and
- restore or enhance properly functioning conditions in the watersheds.

Program development officially began on July 1, 1993, with the collection of Surface Water Management fees based on impervious surface area.

On January 1, 2017, Oak Lodge Sanitary District and Oak Lodge Water District officially consolidated into Oak Lodge Water Services (OLWS). Prior to this consolidation, Oak Lodge Sanitary District passed Resolution (16-12) assigning all assets and obligations to the Oak Lodge Water Services. Oak Lodge Water Services understands that it must meet the obligations that OLSD made for the MS4 Permit. In 2023, OLWS became an Authority, which is a type of special district that holds its assets, duties, and boundaries in perpetuity, including the requirements of the MS4 Permit.

### Permit History

Under the federal Clean Water Act (CWA) and Oregon Revised Statute 468B.050, Oregon Department of Environmental Quality (DEQ) has issued the Oak Lodge Water Services (OLWS) a renewed National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Phase I Discharge Permit, effective October 1, 2021.

OLWS is a co-permittee on the Clackamas County NPDES MS4 Permit, along with 11 other agencies. The first permit (101348) was issued in 1995. A second permit was issued in 2005 after an appeal and a modification. A third permit was issued in 2012, expired in 2017 and went into administrative extension until a renewed permit with an effective date of October 1st, 2021, and a modified monitoring plan approved effective May 5, 2023.

The 2022 version of the OLWS's Stormwater Management Program (SWMP) Document was developed based on a review and evaluation of the OLWS's stormwater management program, including activities and accomplishments implemented during the previous permit term and during the administrative extension period. The OLWS has used an adaptive management process to assess and modify, if necessary, best management practices (BMPs) to achieve reductions in stormwater pollutants to the maximum extent practicable. The SWMP modifications consider available technologies and practices; review of measurable goals and tracking measures; and evaluation of resources available to implement programs.

The BMPs are evaluated annually during the preparation of the NPDES MS4 Annual Report. The annual reports include the status of implementing each BMP and any proposed modifications or adaptations to the program.

This Annual Report describes activities related to implementation of the OLWS's NPDES MS4 Permit and the SWMP. The SWMP contains BMPs, which outline the specific tasks that the OLWS will conduct to prevent and reduce stormwater pollution to the maximum extent practicable to protect water quality and satisfy the requirements of the NPDES MS4 Permit and the CWA.

**Table 1 – Highlighting the NPDES MS4 Annual Reporting Requirements**

| Annual Reporting Requirements from Schedule B.3.a. - I.  | Location in document |
|--|----------------------|
| <p>a. The status of implementing the Stormwater Management Program (SWMP) and each control measure program element in Schedule A.3, including progress in meeting the measurable goals and program tracking and assessment metrics identified in the SWMP Document as well as additional annual reporting requirements identified in each section, or, prior to SWMP Document approval by DEQ, measurable goals and tracking metrics approved under the previous permit's approved SWMP.</p>   | Section 3            |
| <p>b. A summary of the adaptive management implementation and any changes or updates to programs made during the reporting year, including rationales for any proposed changes to the SWMP (e.g., new BMPs), and review of related new and historical monitoring data. This summary should also include discussion of the implications of, or any findings related to recent years' adaptive management and/or changes made to the SWMP Document, based on data from tracking measures, measurable goals, and/or any monitoring related to the change.</p> | Section 5            |
| <p>c. Any proposed changes to SWMP program elements that are designed to reduce Total Maximum Daily Loads (TMDL) pollutants.</p>   | Section 6            |
| <p>d. A summary of education &amp; outreach and public involvement activities, progress toward or achievement of measurable goals, and any relevant assessment of those activities. This should include planned adaptive management or other program enhancements to occur in the following years.</p>   | Section 4            |
| <p>e. A summary describing the number and nature of enforcement actions, inspections, and public education programs, including results of ongoing field screening and follow-up activities related to illicit discharges.</p>  | Appendix A           |
| <p>f. A list of entities referred to DEQ for possible 1200-Z NPDES general permit coverage based on co-permittee screening activities, a list of categories of facilities inspected, and an overview of the results of inspections of commercial and industrial facilities.</p>  | Appendix A           |
| <p>g. A summary of total stormwater program expenditures and funding sources over the reporting fiscal year, and any anticipated in the next fiscal year.</p>  | Section 7            |
| <p>h. A summary of monitoring program results, including monitoring data that are accumulated throughout the reporting year submitted in the DEQ-approved Data Submission Format, and any assessments or evaluations of that data completed by the co-permittees or an authorized third party.</p>   | Appendix B           |
| <p>i. Any proposed modifications to the monitoring plan are necessary to ensure that adequate data and information are collected to conduct stormwater program assessments.</p>  | Section 9            |
| <p>j. An overview, as related to MS4 discharges, of concept planning, land use changes and new development activities (including the number of new post-construction permits issued) that occurred within the Urban Growth Boundary (UGB) expansion areas during the reporting year, and those forecast for the following year, where such data is available.</p>  | Section 11           |
| <p>k. The details of all corrective actions implemented associated with Schedule A.1.b.iii during the reporting year.</p>  | Appendix A           |

## **2. Report Organization**

This report is organized based on the requirements of the October 2021 NPDES permit, Schedule B.5.a through B.5.1. The numbers listed after the report headings indicate the portion of the permit schedule that the section addresses. The report covers the activities of OLWS from July 1, 2024 to June 30, 2025. Information about implementation of required BMPs is summarized in Appendix A. Lastly, the DEQ Grab Data Submission Table summarizes water quality sampling activities in Appendix B. Brief summaries of each topic are described in this document.

## **3. Status of SWMP Program Document, Information, Metrics (A.2.c-d)**

The Oak Lodge Water Services implemented the current Surface Water Management Program (SWMP) in 2022, based on the current requirements of the 2021 MS4 Permit. For this annual report, implementation of the SWMP is being reported based on the requirements in the current permit (No. 101348). This information is summarized in this Narrative and in Appendix A of this report.

## **4. Status of Public Education Programs (A.3.a)**

OLWS uses multiple avenues to educate the public about the importance of surface water protection.

OLWS includes bi-monthly newsletters in our bills and posts the same information on our website and social media. OLWS partners with multiple agencies and non-profits to support public outreach and education focused on stormwater.

Ongoing public education through programs include:

- OLWS Storm Drain Cleaning Assistance Program (SCAP)
- OLWS Wastewater Treatment Plant Tours

Over time, OLWS has created, supported, and implemented a variety of programs and partnerships to provide outreach to the community about surface water issues. Partnerships include:

- Backyard Habitat Certification Program with Portland Audubon and Columbia Land Trust
- Ecology in Classrooms & Outdoors (ECO)
- Clackamas Community College Environment Learning Center (CCC ELC)
- Regional Coalition for Clean Rivers and Streams (Coalition)
- North Clackamas Park and Recreation District (NCPRD)

### **Storm Drain Cleaning Assistance Program (SCAP)**

The Storm Drain Cleaning Assistance Program helps businesses maintain their parking lot drains at a discounted price, removing contaminants and preventing flooding. Each year, we send reminders to local businesses in spring and fall, reminding them to maintain their drains to prevent flooding and protect local water quality. Below is an example of the postcard we send as part of our outreach. This messaging is also included in our own newsletter, a prominent community newsletter, on social media, and on our site.



## Reminder: Spring Storm Drain Maintenance

Discounted storm drain cleaning is available through OLWS

Maintain your storm drains this spring to reduce flooding and prevent contaminants from entering local streams! OLWS offers a program to help businesses clean their parking lot drains for a discounted flat fee of **\$55 per drain**.



Register at [OakLodgeWaterServices.org/scap](https://OakLodgeWaterServices.org/scap) by April 30, 2025.

Questions? Email [info@olws.org](mailto:info@olws.org) or text/call (971) 291-4533.



Scan to register

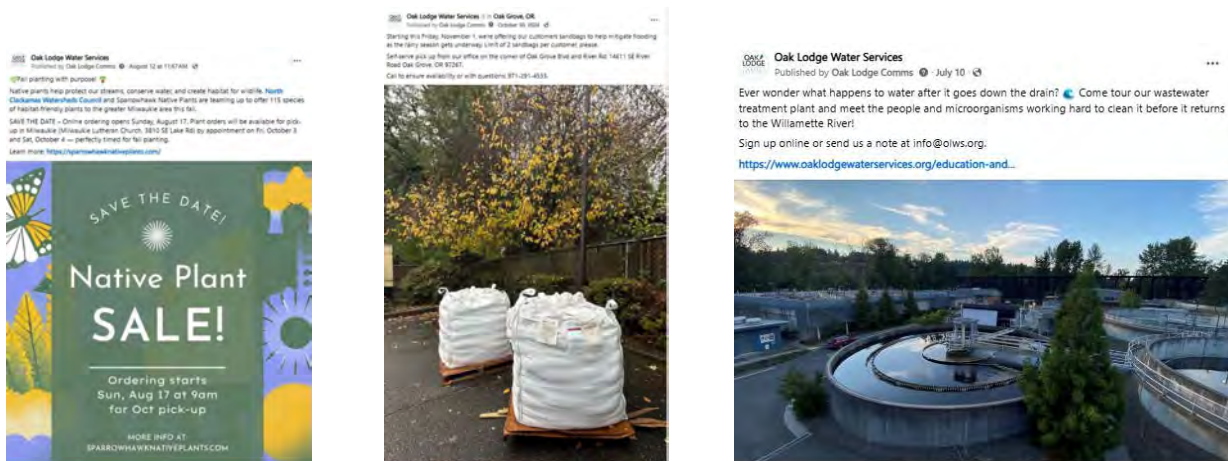
### Wastewater Treatment Plant Tours

OLWS hosted 5 tours between July 1, 2024 – June 30, 2025. The tours give a high-level overview of wastewater treatment processes. During the tour, we discuss how individual actions can act as “pre-treatment” before water ever reaches our plant (e.g. throwing away wipes instead of flushing them). We also talk about OLWS’ work to add a tertiary treatment facility to remove stubborn contaminants and better protect our waterways.

### In-person Events

OLWS was a sponsor for the 2025 Oak Grove Festival, where we talked with customers about a variety of topics, including stormwater and not dumping into storm drains. We also provided resources and booklets about native plants and their impact on the local watershed.

Below are examples of OLWS social media posts to discourage the use of lawn chemicals and connect the community to their waterways.



### Backyard Habitat Certification Program

OLWS partners with the Backyard Habitat Certification Program (BHCP) to support urban gardeners in their efforts to create natural backyard habitats. This includes working with homeowners to find

stormwater solutions in their yards that mimic nature: allowing runoff to soak into the ground to be filtered. In 2024-25 in the OLWS Service Area, BHCP visited 19 properties and 1 was certified.



*Willamette View Retirement Community - Platinum Certified*

**Figure 1: Residents at Willamette View, which is within OLWS service area, display their Platinum Certification**

### **Ecology in Classrooms & Outdoors (ECO) and Aves Compartidas**

This year's ECO and Aves Compartidas programming engaged approximately 480 students across Oak Grove Elementary, View Acres Elementary, Candy Lane Elementary, and Riverside Elementary, totaling 1,913 contact hours. ECO educators delivered 58 indoor and 15 outdoor lessons. Activities were also delivered to Spanish-speaking classrooms as part of Aves Compartidas.

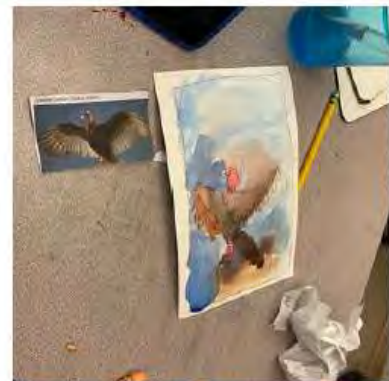
The curriculum covered a broad range of ecological topics, including watershed health, wetland flora and fauna, and the identification of invasive and native plants. One student shared this message: "Thank you for helping my class to learn more about birds. The field trip was really fun. I loved looking at the birds and macroinvertebrates in the wetland."



*Riverside students learn about watersheds through the flow of water in the aluminum models they created.*



*View Acres students sketch native species found in their rain garden*



*Candy Lane students create watercolor paintings of migratory bird species to share with students in Mexico*

**Figure 2: Ecology in Classrooms & Outdoors student activities and field trips.**

### **Clackamas Community College Environmental Learning Center (CCC ELC)**

This winter the Environmental Learning Center presented Livestream episodes to K-5 students. Each of ten episodes focused on wetland ecology, wildlife, and watershed health. Student activity sheets were

developed to engage students in the content; each program has an accompanying sheet. Programs aligned with Next Generation Science Standards (NGSS).

Teachers were provided with recordings of the sessions in addition to links for joining the live events, enabling them to view the presentation at a time that was convenient for them. Two episodes were delivered each week, one for grades K-3 (Wild About Water) and the other for grades 4-5 (Wild in the Wetland). Some topics that were featured are:

- Go With the Flow: January 7, 2025, with 49 students
- Mighty Tiny Wetland Creatures: January 14, 2025, with 49 students
- Plants with Wet Feet: January 21, 2025, with 105 students
- Beavers - Nature's Builders: January 28, 2025, with 105 students
- Animal Homes: February 4, 2025, with 105 students



**Figure 3: Jennings Lodge pre-school students participating in a soil exploration activity.**

The CCC ELC also offers three field trips that immerse students in discovering and exploring the beautiful wetland and forest ecosystems. All field trips are two hours long. Field trip activities include:

- Learning about wetland inhabitants and solving wildlife mysteries
- Measuring the quality of water in our wetland, including sampling for macroinvertebrates
- Experimenting with the role that soil plays in filtering pollutants from the water

| School (field trip)  | Grade           | # of students |
|--|-----------------|---------------|
| Oak Grove Elementary<br>(Welcome Home: exploring wetland and forest habitats)) | 3rd grade       | 50            |
| Riverside Elementary<br>(Healthy Watersheds & Welcome Home)                    | 3rd, 4th grades | 48            |
| View Acres Elementary<br>(Welcome Home)  | 2nd , 3rd grade | 126           |
| <b>TOTAL</b>   |                 | <b>224</b>    |

### **Regional Coalition for Clean Rivers and Streams (Coalition)**

OLWS is active with the Regional Coalition for Clean Rivers and Streams (Coalition). The Coalition continued its work – initiated in the late 1990s – of providing coordinated messaging about area water health and residential behaviors linked to stormwater pollution from across the Portland metropolitan region in Washington, Multnomah, and Clackamas counties.

The Coalition continues its mission of collaborating across the Portland metropolitan region to improve watershed health by changing household behaviors, reducing polluted runoff and connecting people with their local waterways.

The Coalition’s key messages focus on raising awareness about pollution from stormwater runoff and motivating actions to protect surface water quality through action at the household level. The key messages are:

- Stormwater runoff goes directly to our local waterways without treatment. When it rains, pollutants from your home, car, and garden wash into our rivers and streams. Never dump anything into storm drains.
- Bacteria from uncollected dog waste washes into our rivers and streams. You can protect our water by picking up after your pets. OLWS partners with NCPRD to provide waste bags for dogs in our service area.
- Yard and garden products wash into our rivers and streams. You can protect our water by eliminating these products or using compost and slow-release fertilizer.
- Motor oil, solvents, and soaps wash into our rivers and streams. You can protect our water by keeping car-care chemicals out of storm drains, diverting wash water onto your landscaping, and going to a car wash.

## **5. Adaptive Management Process (A.2.f)**

Over time, OLWS continues to evaluate the overall health of local watersheds using the information collected through the monitoring program. Monitoring data and information provides a valuable ‘snapshot’ of water quality in OLWS and provides program management the opportunity to determine where to focus limited financial resources for program implementation. OLWS continues targeting water quality issues that are trending toward exceeding state water quality standards; adjustments can be made to focus the messaging to the community about different water quality problems being observed. The anticipated outcome would be a reversal of negatively trending water quality factors because of actions taken by OLWS. Examples of actions might include increasing inspection and enforcement in areas with documented water quality issues, targeted public outreach to smaller neighborhood or watershed groups that are the source of the problem, and targeted monitoring activities to try to minimize the area where the source of the water quality problems are coming from.

In 2024-2025, OLWS reviewed and updated its Private Stormwater Inspection and Reporting process. It added electronic reporting and prepared the program for public reporting through our online mapping system. The new form is available online on the OLWS Watershed Protection pages. Second, OLWS completed an audit of its Design and Construction Standards language and procedures concerning erosion control inspection, reporting, and enforcement processes and found no changes were needed. Current erosion control practices were found to be in compliance and are available on the OLWS website. Finally, OLWS updated our Industrial / Commercial SOP with a focus on screening and reporting. This document was shared with the public for a 30-day period and the final Industrial / Commercial SOP is available in the online OLWS MS4 Permit document library.

## **6. Proposed Changes to SWMP (A.2.f)**

OLWS amended the SWMP during the 2023-2024 permit year as a result of the updated permit conditions required by DEQ. OLWS updated the 2023 SWMP during FY2024 to document the references to updated IDDE SOP, Erosion Control Practices and Procedures, and Industrial / Commercial SOP. The revised SWMP is posted on the MS4 Permit Library on the Watershed Protection Pages of the OLWS website.

## **7. Summary of SWM Program Expenditures (B.3.g)**

All revenue generated by the Watershed Protection Fee is retained within the Surface Water Management Program. During the 2025 Fiscal Year, one Equivalent Service Unit (ESU) was \$12.58 per month for residential households. For commercial and industrial users their ESU equivalent is calculated by dividing their total impervious surface by the residential ESU, or by 2,500 SF.

For the 2025 Fiscal Year, OLWS's expenditures for the surface water program totaled \$1,965,300, with \$1,942,550 for operational expenditures and \$22,750 from the Watershed Protection Capital Fund.

## **8. Approved Modifications to Monitoring Plan (B.5.c)**

OLWS monitors stormwater and receiving waters of the state using the currently approved monitoring plan. Clackamas co-permittees including OLWS participate in the Clackamas County Coordinated Stormwater Monitoring Program (CCCSMP). The CCCSMP Plan was updated and resubmitted to DEQ on May 30, 2023, following the completion and outcome of the Clackamas NPDES MS4 Permit Modification (initiated in August 2022). The CCCSMP reflects updated pesticide monitoring frequencies and was approved by DEQ on June 7, 2023, and implementation began in July 2023.

## **9. Summary of SWM Program Water Quality Monitoring (B.5.d-e)**

Surface water sampling occurred four times annually as is required in the NPDES permit. The sites sampled included instream samples from each site, and two outfalls. In reviewing the water quality data, water quality elements for sediment and bacteria tend to be elevated, with periodic exceedances of the state standard for e. Coli. Other testing elements appear to be within DEQ range, and for this reporting year monitoring occurred per the procedures outlined in the approved monitoring plan.

Required mercury monitoring for the Clackamas MS4 Permit is being handled by Clackamas Water Environment Services (WES) and the first full year of sampling results will be submitted by the WES team as approved by the Oregon Department of Environmental Quality.

Required pesticide monitoring is included in this year's water quality monitoring data.

Sample results are provided in Appendix B.

## **10. SWMP Inspection and Enforcement (A.3.c)**

OLWS routinely inspects the various elements of the Surface Water system within OLWS. A summary of the inspections, enforcements, and ongoing activities related to illicit discharges can be found in Appendix A.

## **11. Development Activities (A.3.e)**

Land within the Oak Lodge Water Services is largely built out, with very little undeveloped land available for new development. Redevelopment activities on existing developed land are more common. Appendix A summarizes the number and type of development activities that OLWS reviewed. Currently, there are no proposals for land annexations, and OLWS does not implement any part of the Urban Growth Boundary.

## **12. OLWS Boundary Expansion and Authority (B.5.j)**

When Oak Lodge Sanitary District consolidated with Oak Lodge Water District to form Oak Lodge Water Services, its total boundary grew by approximately 25%; this newly acquired area was already within Clackamas County Service District #1 (CCSD#1). To clarify whose authority would preside in this area, Oak Lodge Water Services worked with CCSD#1 to create a Memorandum of Understanding (MOU) that allowed CCSD#1 to continue its storm service in this area since this area naturally drained to watersheds CCSD#1 manages. This MOU was later adopted via OLWS Resolution 2017-5. In addition, in 2023 Oak Lodge Water Services became an Authority. This protects the jurisdiction's assets, services and boundaries in perpetuity.

## **13. Public Notice of 2024-2025 Annual Report**

OLWS solicited public comment on this annual report in the following manner:

- Public Notice and Solicitation of Comments on the OLWS website: 2<sup>nd</sup> week, October 2025;
- North Clackamas Watersheds Council: OLWS's monthly report mentions availability of the report on the website for public review and comment: 3<sup>rd</sup> week, November 2025;
- The final 2024-2025 Annual Report was posted on OLWS website after submission to DEQ;
  - Notice of the Annual Report Posting was sent to OLWS's *Interested Parties* list.

## **Appendix A – BMP Table**

Best Management Practices table of program reporting attached as a PDF.

**Appendix A: BMP Table – OLWS 2024-2025 Summary of BMP Implementation**

| <i>Best Management Practice Name</i>   | <i>MS4 Permit Schedule A Requirement</i> | <i>BMP Description</i>   | <i>Tracking Measure</i>  | <i>Annual Report 2024-2025</i>   |
|--|--|--|--|--|
| <p><b>Illicit Discharge Detection and Elimination</b></p> <p><b>Implement the Illicit Discharges Elimination Program</b></p> | A.3.c                                    | <p><b>BMP Description:</b> OLWS has the authority to conduct appropriate response procedures and enforce against responsible parties per the OLWS's <i>Rules and Regulations</i>, Section 11 and as described in the OLWS's Spill and Illicit Discharge Enforcement Response Plan (Enforcement Response Plan).</p> <p>The OLWS partners with Clackamas County for code enforcement procedures, as outlined in Section 11.5 of the <i>Rules and Regulations</i>, which outline the enforcement as applicable to the violation class. The violation classes (I, II, and III) are detailed in Section 11.4 of the <i>Rules and Regulations</i>.</p> <p>The Spill and Illicit Discharge Enforcement Response Plan, including procedures and timeframes, are also documented in Appendix C of the OLWS's <i>Illicit Discharge Detection and Elimination Standard Operating Procedure</i> (SOP). In accordance with the SOP, all citizen complaints and staff observations regarding a possible illicit connection will be investigated. OLWS will continue to implement a public education and outreach program to explain illicit connections, effects on surface water, and process for correction.</p> | <p>Measurable Goals:</p> <ol style="list-style-type: none"> <li>1) Status of updating the SOP and Enforcement Response Plan for consistency with current practice.</li> <li>2) Track the number, location, resolution, and enforcement activities related to any identified illicit discharge.</li> </ol>  | <ol style="list-style-type: none"> <li>1. The Illicit Discharge Detection and Elimination SOP was updated and submitted to DEQ December 1, 2023. No new updates.</li> <li>2. Illicit Discharge identification: 2               <ol style="list-style-type: none"> <li>a. Locations with resolution and enforcement activities:                   <ul style="list-style-type: none"> <li>• 2024-12-10: MITSUBISHI DEALERSHIP: Car washing practices and chemical storage issues; EcoBiz worked with business to correct the issues.</li> <li>• 2024-11-19: 4830 SE INA AVE: Resolution and enforcement through contractor education.</li> </ul> </li> </ol> </li> </ol> |
| <p><b>Illicit Discharge Detection and Elimination</b></p> <p><b>Conduct Annual Dry Weather Field Screening</b></p>           | A.3.c                                    | <p><b>BMP Description:</b> OLWS conducts illicit discharge inspections, monitoring, and investigations annually during dry-weather conditions (typically between August and October) in accordance with the OLWS IDDE SOP. OLWS has identified five (5) high priority inspection locations within its service area. The IDDE SOP lists and maps those high priority inspection locations by drainage basin and contributing land use type. OLWS maintains a map of dry weather field screening locations: GIS System and Asset Management Database for more information. OLWS does not currently have chronic illicit discharge locations, but locations may be added if identified.</p>   | <p>Measurable Goals:</p> <ol style="list-style-type: none"> <li>1) Track annual dry weather field screening activities at the high priority inspection locations.</li> <li>2) Summarize inspection results and indicate locations requiring sampling and/or investigations.</li> <li>3) Update dry weather screening prioritization criteria and adjusted locations, as applicable.</li> </ol> | <ol style="list-style-type: none"> <li>1. All five Dry Weather Outfalls were inspected during the dry season (first quarter) of the 2024-2025 Permit year.</li> <li>2. No illicit discharges were noted from the outfall inspections.</li> <li>3. Updates were last made to the IDDE SOP in 2023. No new updates.</li> </ol>   |
| <p><b>Illicit Discharge Detection and Elimination</b></p>  | A.3.c                                    | <p><b>BMP Description:</b> OLWS's Spill Response Program prevents, contains, and responds to spills of dangerous, hazardous and other materials. OLWS's Spill Response Program ensures that the actual or possible release of dangerous/hazardous materials to the MS4 is properly addressed. Except for minor incidents, OLWS's Spill Response Program personnel always coordinate closely with other agencies and departments, including Clackamas County Fire District No. 1 (and for certain incidents involving hazardous materials, the</p>  | <ul style="list-style-type: none"> <li>• Implement the spill response program and associated protocols.</li> <li>• Coordinate with the Clackamas County Fire OLWS No. 1, Clackamas County DTD, and DEQ as necessary to respond to spills.</li> </ul>   | <ol style="list-style-type: none"> <li>1. Number of reported spills: 5 potential issues</li> <li>2. Source and type of response to the reported spills: Car washing practices and chemical storage issues; response was OLWS staff and EcoBiz worked with businesses to correct issues.</li> </ol>   |

**Appendix A: BMP Table – OLWS 2024-2025 Summary of BMP Implementation**

| <i>Best Management Practice Name</i>   | <i>MS4 Permit Schedule A Requirement</i> | <i>BMP Description</i>   | <i>Tracking Measure</i>  | <i>Annual Report 2024-2025</i>   |
|--|--|--|--|--|
| <b>Implement the Spill Response Program</b>                                    |  | Gresham HazMat Team), DEQ, Oregon State Police, the Clackamas County Department of Transportation and Development (CCDTD), and the Oregon Department of Transportation (ODOT).   | <ul style="list-style-type: none"> <li>Equip select Operations vehicles with spill response equipment and the Spill and Illicit Discharge Response Form.</li> </ul> <p>Measurable Goals:</p> <ol style="list-style-type: none"> <li>Number of reported spills to the MS4 system.</li> <li>Source and type of response to the reported spills.</li> <li>Report the number of spills and spill responses logged in Lucy.</li> </ol>  | <ol style="list-style-type: none"> <li>Report the number of spills and spill responses logged in Lucy: 5 reported, of which only 2 required follow up action.</li> </ol> <p>IDDE complaint tracking numbers and response descriptions are saved in our content management system, Lucy. Records available on request:</p> <ul style="list-style-type: none"> <li>2024-12-10: MITSUBISHI DEALERSHIP</li> <li>2024-11-19: 4830 SE INA AVE</li> </ul> |
| <b>Industrial and Commercial Screen Existing and New Industrial Facilities</b> | A.3.g                                    | <p><b>BMP Description:</b> Industrial facility screening activities are outlined in the OLWS' Industrial/Commercial Stormwater Inspection Program Standard Operating Procedure (SOP).</p> <p>Annually, in conjunction with BMP IND-2: Address High Pollutant Source Facilities, OLWS will review their existing database of commercial accounts within the district boundaries, to determine whether existing facilities may be subject to an industrial stormwater NPDES permit.</p> <p>If a facility is identified during the permit process or in conjunction with review of the commercial accounts database that would be subject to an industrial stormwater NPDES permit, the facility and DEQ will be notified within 30 days.</p> <p>OLWS maintains a GIS layer of all facilities subject to the 1200-Z permit and will update as new facilities are identified.</p>  | <p>Measurable Goals:</p> <ol style="list-style-type: none"> <li>Track the number of existing or new industrial facilities subject to a stormwater industrial NPDES permit during the permit term.</li> <li>Review new industrial development applications once during the permit term to identify additional facilities needing to obtain 1200-Z permits. If facilities are identified, notify DEQ in 30-days.</li> </ol>  | <ol style="list-style-type: none"> <li>1200Z industrial NPDES permits               <ol style="list-style-type: none"> <li>Existing: 2</li> <li>New: 0</li> </ol> </li> <li>New industrial development applications: 0</li> </ol>  |
| <b>Industrial and Commercial Address High Pollutant Source Facilities</b>      | A.3.g                                    | <p><b>BMP Description:</b> Industrial facility screening activities are outlined in the OLWS' Industrial/Commercial Stormwater Inspection Program Standard Operating Procedure (SOP).</p> <p>OLWS maintains a list of industrial and commercial facilities with the potential to discharge a substantial pollutant load to the MS4. Identification of a high priority facility is based on citizen complaints, results of past inspections, the <i>Industrial Users Survey</i>, and other sources. The list is updated annually and maintained by the OLWS' Pollution Prevention Specialist.</p> <p>Annually at a minimum, inspections (windshield or onsite) will be conducted. Inspections of identified high priority facilities will occur only for facilities with discharges to the municipal storm sewer system. Facilities with a discharge through a private system directly to a surface water body will be the responsibility</p> | <ul style="list-style-type: none"> <li>Maintain the inventory of high pollutant source facilities continuously over the permit term.</li> <li>Inspect identified facilities as needed using visual or analytical methods. When inspections indicate excess levels of pollutants of concern, notify and work with industries to increase pollution controls, and provide technical assistance to property owners.</li> <li>Updates to the Industrial/Commercial Facility SOP were completed with facility prioritization, inspection and documentation procedures, and compliance with other ordinances by December 1, 2023.</li> </ul> | <ol style="list-style-type: none"> <li>Inventory of high pollutant source facilities: 4           <ul style="list-style-type: none"> <li>16600 SE Kens Ct. (Blue Sky Filters)</li> <li>3901 SE Naef Rd. (NW Flex Space)</li> <li>3810 SE Naef Rd. (Stanley Tools)</li> <li>3701 SE Naef Rd. (Buffalo Welding)</li> </ul> </li> <li>Inspections performed: no inspections and no enforcement actions required</li> </ol>                            |

**Appendix A: BMP Table – OLWS 2024-2025 Summary of BMP Implementation**

| <i>Best Management Practice Name</i>                               | <i>MS4 Permit Schedule A Requirement</i> | <i>BMP Description</i>   | <i>Tracking Measure</i>  | <i>Annual Report 2024-2025</i>  |
|--|--|--|--|---|
|  |  | of Oregon DEQ. Inspection forms will be filled out, documenting the results of each inspection. As needed, technical support will be provided to property owners to improve water quality.   | Measurable Goals:<br>1) Track updates to the inventory of high pollutant source facilities.<br>2) Track the number of inspections performed annually and any enforcement or technical assistance provided.   |   |
| Construction Site Runoff Control<br><br>Erosion Control Ordinances | A.3.d                                    | <p><b>BMP Description:</b></p> <p>OLWS administers erosion prevention and sediment control requirements in accordance the OLWS' <i>Rules and Regulations</i>, Section 10.15 and the OLWS's <i>Design and Construction Standards</i>, Section 2.1004. These sections detail the policies, procedures, and enforcement mechanisms related to the OLWS' issuance of Erosion Control/Surface Water Management Permits. Construction activities that affect 500 SF or more or 250 SF or more within the undisturbed buffer, sensitive areas, or riparian areas must obtain an Erosion Control/Surface Water Management Permit.</p> <p>The combined documents address regulatory and review requirements related to erosion control, tree removal, undisturbed buffers, and flow control and treatment requirements. These regulations require submittal of an erosion prevention and sediment control plan containing methods and/or interim facilities to be constructed or used concurrently with land development.</p> <p>During the plan review process, new and redevelopment will be assessed for compliance with the OLWS' erosion control standards and provisions outlined in the Code and Clackamas County Erosion Prevention and Sediment Control Planning and Design Manual using an internal review checklist. OLWS' written approval of erosion control plans and specifications is required prior to erosion control facility construction and installation. DEQ's 1200-C permit requirements also are in effect and OLWS tracks 1200-C permits issued and implement inspections and enforcement consistent with the local permit.</p> | Measurable Goals:<br>1) Report any updates or modifications to the OLWS's <i>Rules and Regulations</i> and the OLWS's <i>Design and Construction Standards</i> for consistency with permit requirements and current practices.<br>2) Record the number of OLWS Erosion Control/Surface Water Management Permits issued annually.<br>3) Develop an option for simplified ESCP and/or prescriptive BMPs for small or low-risk construction sites to aid in erosion control plan development by December 1, 2024, in conjunction with updates to OLWS Design and Construction Standards.<br>4) Update the current drainage/ESCP plan internal review checklist by June 1, 2023 to detail plan review activities in accordance with 1200-CN permit requirements and receipt of a 1200-C permit, if applicable. | 1. No updates to the Rules and Regs. The Design and Construction standards were updated on October 10, 2024, by Board approval.<br>2. Number of erosion control permits issued: 46<br>3. A simplified ESCP narrative checklist with prescriptive BMPs for small or low-risk construction sites is available on the website.<br>4. The current drainage/ESCP plan internal review checklist was updated.                   |
| Public Education and Outreach<br><br>Public Education to Reduce    | A.3.b                                    | <p>OLWS continues to implement the OLWS' Outreach, Education, and Public Involvement Framework to document their public education strategy aimed at reducing the discharge of pollutants associated with a variety of materials, events, outreach activities, and education programs, including but not limited to:</p> <ul style="list-style-type: none"> <li>• The application of pesticides, herbicides and fertilizers by citizens.</li> <li>• Illicit discharges and public reporting to notify OLWS of unallowable waste materials in the storm drainage system. The OLWS website allows citizens to report incidents directly via a 24-hour emergency hotline or email.</li> </ul>  | Measurable Goals:<br>1) Track the number, types and topics of outreach events, programs, social media and materials.<br>2) Continue to maintain relevant public education materials dispensed to the public annually.  | 1. Number, types and topics of outreach events, programs, social media and materials <ul style="list-style-type: none"> <li>a. Newsletter: Six newsletters to all OLWS customers. Topics included surface water education topics, including water quality and watershed health.</li> <li>b. Paid Media with KPTV (FOX 12): 6 social media posts and 6+ TV ads focused on seasonal stormwater management topics</li> </ul> |

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|--|--|--|-------------------------|--|
| Discharges of Pollutants in Stormwater |  | <ul style="list-style-type: none"> <li>• Available OLWS programs for residents to improve water quality.</li> <li>• Proper disposal of waste oil and household hazardous waste.</li> </ul> |                         | <ul style="list-style-type: none"> <li>c. Website material:               <ul style="list-style-type: none"> <li>i. Landscape Maintenance Service BMPs</li> <li>ii. Pressure Washing and Surface Cleaning infographic and information</li> <li>iii. Actions to take to help protect local creeks and the Willamette River</li> </ul> </li> <li>d. Program Partnerships:               <ul style="list-style-type: none"> <li>i. Environmental Learning Center (ELC): 335 students with 20 livestream classes and 9 field trips. Topics: wetland ecology, wildlife, and watershed health</li> <li>ii. ECO: 480 students with 58 indoor and 15 outdoor lessons. Topics: watershed health, wetland flora and fauna, identification of invasive and native plants</li> <li>iii. Backyard Habitat Certification Program (BHCP): 19 properties visited and 1 was certified. Topics: stormwater solutions in yards</li> <li>iv. North Clackamas Watersheds Council: <a href="#">Streamside Stewards Program</a> (SSP) to support 48 landowners along OLWS streams with annual maintenance in priority habitat areas</li> <li>v. EcoBiz: Outreach to 21 businesses. Technical assistance to 1 business. Topics: car washing, run-off management</li> <li>vi. Regional Coalition for Clean Rivers and Streams: provided outreach via paid and organic social media</li> </ul> </li> </ul> |

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|--|--|--|---|---|
|  |  |  |   | <p>(305,760 total reach), community events, and partnerships. Topics: area water, health, and residential behaviors linked to stormwater pollution</p> <p>vii. North Clackamas Park and Recreation District (NCPRD) financial assistance to purchase pet waste bags. Topics: reducing pet waste</p> <p>e. In person Events:</p> <p>i. Clean Water Festival exhibitor. Topics: effect of littering on wastewater and stormwater.</p> <p>ii. OLWS Wastewater Treatment Plant Tours: 5</p> <p>iii. Oak Grove Festival exhibitor. Topics: native plants and impact on watersheds.</p> <p>2. Relevant public education materials:</p> <p>a. Fish on the Run – Irrigation Done</p> <p>b. Native Plant booklet</p> |
| <p>Public Education and Outreach</p><br><p>Public Education to Reduce Discharges of Pollutants in Stormwater</p> | <p>A.3.f</p>                             | <p><b>BMP Description:</b> Privately owned SWM facilities require periodic inspection and maintenance to keep them working correctly. This effort focuses on outreach and education to those private landowners who own these types of facilities.</p> | <p>Measurable Goals:</p> <ol style="list-style-type: none"> <li>1) Number and Type of Education and Outreach efforts provided to private landowners with stormwater management facilities.</li> <li>2) Track coordinated public outreach activities with local co-permittees.</li> <li>3) Record the number of catch basins stenciled each year.</li> </ol> | <ol style="list-style-type: none"> <li>1. 669 Outreach letters were sent to owners with stormwater maintenance agreements reminding them about cleaning and maintenance requirements. Provided supplemental information to owners when owners reached out requesting additional information.</li> <li>2. Participation in the co-permittee Stormdrain Cleaning Assistance Program (SCAP) with postcards sent to 245 commercial owners with private storm drains on their property/business.</li> <li>3. No new catch basins were stenciled, as no interns or internal staff time were available this year.</li> </ol>   |

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|--|--|--|---|--|
| Public Education and Outreach<br><br>Erosion Control Training Opportunities            | A.3.a                                    | <b>BMP Description:</b> Provide notice to construction site operators concerning where education and training to meet erosion prevention and sediment control requirements can be obtained.  | <b>Measurable Goals:</b><br>1) Track methods and tools to notify construction site operators of erosion control requirements and training opportunities.<br>2) Maintain a link to the Clackamas County Erosion Prevention and Sediment Control Planning and Design Manual on the OLWS's website.<br>3) Develop a check list (or equivalent) guidance for developers and engineers requesting building permits, site development permits, or construction inspection services to aid in erosion control plan development by December 1, 2024, in conjunction with updates to OLWS Design and Construction Standards. | 1. Oak Lodge provides construction site operators with notice and training opportunities on an ad hoc basis during initial inspections at the start of new erosion control permits.<br>2. A link to the Clackamas County Erosion Prevention and Sediment Control Planning and Design Manual is maintained on the OLWS website.<br>3. Guidance to aid in development of an erosion control plan is available on the OLWS website. |
| Public Education and Outreach<br><br>Employee Training                                 | A.3.a                                    | <b>BMP Description:</b> A variety of training is provided to staff associated with surface water management. Training and advisory committee opportunities are made available through local agencies and groups involved with a broad range of water quality issues including stormwater (e.g., Oregon Association of Clean Water Agencies conferences). Such training is provided based on need and availability. | <b>Measurable Goals:</b><br>1) Track the number of employees receiving training by activity annually.<br>2) Estimate the equivalent annual training hours provided internally and externally.   | <b>Specific Staff Trainings included:</b><br>1. Number of employees received training: 10<br>Training activity included:<br>o In-house staff training on sediment control and good housekeeping practices,<br>o stormwater conference,<br>o CESCL renewal training.<br>2. Equivalent annual training hours<br>o Internal: 10 hours<br>o External: 16 hours   |
| Public Education and Outreach<br><br>Facilitate Public Reporting of Illicit Discharges | A.3.c                                    | <b>BMP Description:</b> OLWS implements a program to promote, publicize, and facilitate public reporting of the presence of illicit discharges and other types of improper disposal of materials into the MS4. After District staff have received a report which relates to one of these discharges, they investigate and, if appropriate, apply control measures.   | <b>Measurable Goals:</b><br>1) Number illicit discharges reported.<br>2) Number of illicit discharges requiring action.<br>3) Number of educational events educating public about illicit discharges and procedures to report.<br>4) Number of publications educating public about illicit discharges and procedures to report.   | 1. Potential illicit discharges reported: 5<br>2. Action required: 2<br>3. Educational Events: The OLWS-EcoBiz partnership offered IDDE outreach events to 21 automotive businesses.<br>4. Educational Publications: The OLWS-EcoBiz partnership offered the IDDE Wash-smart video online and introduced it to 21 automotive businesses.   |

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|---|--|--|---|---|
|   |  |  | 5) Create a page for public complaints on the OLWS' website and track number of complaints for reporting.   | 5. Public complaints: 5   |
| Public Involvement and Participation<br><br>Healthy Watershed Committee                   | A.3.b                                    | <p><b>BMP Description:</b> Schedule A.4.e of the District's MS4 NPDES permit requires OLWS to provide opportunity for public participation in the development, implementation, and modification of the Storm Water Management Plan (SWMP). Prior to submittal of various milestone reports, OLWS will provide the public with an opportunity to comment for a period of 2 weeks prior to submittal dates. Comments on the documents will be collected and considered.</p> <p>Additionally, OLWS has many opportunities for members of the community to participate in various sub committees that provide oversight and guidance to OLWS management related to MS4 implementation. Opportunities include intermittent participation in the Healthy Watersheds Committee, to which local community members are invited to participate in review of OLWS stormwater capital projects.</p>  | <p>Measurable Goals:</p> <ol style="list-style-type: none"> <li>1) Keep a count of the number of comments/questions received from the public on documents distributed for 30-d review.</li> <li>2) Conduct an annual review of the website and document revised content and links as needed.</li> <li>3) Report on Healthy Watersheds Committee activities annually.</li> </ol>   | <ol style="list-style-type: none"> <li>1. Comments or questions received during Design and Construction Standards 30-day review period: 0</li> <li>2. The OLWS website was reviewed and updated as needed to reflect current permit documents.</li> <li>3. Healthy Watersheds Committee met once with no activities to report.</li> </ol> |
| Construction and Post-Construction Site Runoff Control<br><br>Erosion Control Inspections | A.3.d                                    | <p><b>BMP Description:</b><br/>OLWS conducts a minimum of three (3) inspections during construction activities at all sites requiring an OLWS Erosion Control/Surface Water Management Permit. Inspections are conducted to ensure proper implementation of erosion control measures.</p> <p>An initial site inspection is conducted to assess the location of erosion control facility installations and the potential for offsite discharge of soil and debris. A final inspection is performed, and the Permit closed when the excavation and grading is finished at the site and the soil has been stabilized to a point where erosion potential is negligible. A minimum of one (1), interim inspection is conducted during a period of high construction activity, ideally after a storm event, or a maximum of three weeks from the previous inspection to ensure erosion control measures and facilities are being appropriately used and maintained.</p> <p>OLWS staff fills out an initial inspection form through Accela during the initial site inspection and populates an electronic erosion control log with information including project contact information, project size, dates of approved erosion control plan, inspections, complaints, and deficiencies as identified during additional erosion control inspections. Accela is accessible by DEQ and is a</p> | <p>Measurable Goals:</p> <ol style="list-style-type: none"> <li>1) Record the number of erosion control inspections conducted annually in accordance with Accela.</li> <li>2) Report the number of construction sites where enforcement provisions per OLWS's Rules and Regulations were issued annually.</li> <li>3) Document status of updated ESC enforcement procedures and developed guidelines or checklists, as required.</li> </ol> | <ol style="list-style-type: none"> <li>1. Number of erosion control inspections completed: 236</li> <li>2. Number of violations that needed enforcement action: 0</li> <li>3. There were no updates to the approved ESC enforcement SOP.</li> </ol>   |

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|---|--|---|---|--|
|   |  | database that maintains all inspection records, including OLWS inspections of 1200-C sites.   |   | JENNIFER   |
| <b>Pollution Prevention for Municipal Operations</b><br><br><b>Street Sweeping and maintenance for Public Streets</b> | A.3.f                                    | <b>BMP Description:</b> Street sweeping is conducted approximately twice per year by Clackamas County, in accordance with conditions and processes identified in the MOU. The County increases this frequency during heavy leaf shedding season, after major construction, after winter deicing activities, and at other times when circumstances dictate the need to minimize the discharge of stormwater pollutants to the MS4.<br><br>Road maintenance and repair work including roadside ditch maintenance is performed by the County and generally scheduled and conducted during the dry season, when possible, to minimize polluted discharges from entering the stormwater conveyance system. Roadside ditch inspections are conducted in conjunction with sweeping activities and per conditions and processes in the MOU. Any required grading activities will meet requirements as stated in the erosion control regulations.<br><br>Through the MOU, Clackamas County is responsible for documentation of sweeping and ditch maintenance activities to fulfill the OLWS's annual reporting obligations. | <b>Measurable Goals:</b><br>1) Number of miles that were swept within OLWS per year<br>2) Mass or volume of debris removed during sweeping<br>3) Length of ditches maintained annually<br>4) Record updates to the MOU between OLWS and CCDTD   | 1. Street Sweeping within OLWS Boundary under MOU with CCDTD: 332 Curb/ Shoulder Miles.<br>2. N/A Cubic Yards debris removed – CCDTD no longer tracks CY debris removed<br>3. Ditch Cleaning by CCDTD: 447 ft<br>4. No updates to the MOU have been initiated this reporting year. |
| <b>Pollution Prevention for Municipal Operations</b><br><br><b>Winter Weather Management</b>                          | A.3.f                                    | <b>BMP Description:</b> Operations and maintenance of public streets within the DTD service area (which includes OLWS) is the responsibility of CCDTD. This includes Winter maintenance activities for roadway operations, litter control, and materials disposal. For information on their activities, refer to the CCDTD MS4 NPDES SWMP.  | <b>Measurable Goals:</b><br>1) CCDTD Roads: See CCDTD's NPDES MS4 SWMP.<br>2) Remove illegal solid waste dumps as they are discovered.<br>3) Track the number of winter weather events, quantities and locations of material used on County roads within OLWS.<br>4) Implement the CCDTD winter maintenance strategy as documented.<br>5) Update the MOU to incorporate winter maintenance activities and tracking needs within the district. | 1-5. Refer to CCDTD's MS4 Annual Report for reference to Winter maintenance events, quantities and locations of material used.   |
| <b>Post-Construction</b>  | A.3.e                                    | <b>BMP Description:</b> OLWS reviews new and redevelopment for compliance with OLWS's <i>Rules and Regulations</i> , Section 10.20 and the OLWS's <i>Design and Construction Standards (D&amp;C)</i> , Section 2. Code and standards detail the policies  | <b>Measurable Goals:</b>  |  |

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|---|--|--|---|---|
| <b>Site Runoff Controls</b>   |  | <p>and requirements related to conveyance, stormwater quantity control, infiltration, and water quality control. Development activities that affect 1,000 SF or more of new and redeveloped impervious surface must implement post-construction stormwater management. Recorded operations and maintenance agreements are required for onsite facilities and are submitted before permit issuance.</p> <p>Acceptable water quality facilities are listed in Code and promote low impact development and green infrastructure, including vegetative infiltration facilities.</p> <p>OLWS uses Accela and an internal review checklist for design submittals in accordance with requirements outlined in the D&amp;C to review development applications. The required submittal includes completed inspection form, narrative, stormwater drainage report, infiltration/ geotechnical testing, and facility design calculations and details. Plan reviewers use the checklist to document the technical feasibility and site constraints related to onsite management of stormwater runoff as well as downstream analysis needs/ requirements and respective treatment and flow control facility sizing.</p> <p>OLWS will conduct a review of their D&amp;C to document OLWS' existing strategy to prioritize LID and GI strategies for stormwater management as well as adherence to the NSSR or alternative compliance standard. Modifications to the D&amp;C will be made to improve upon OLWS' existing strategy and comply with requirements of the NPDES MS4 permit.</p> <p>Post-construction stormwater management specific training is outlined in Staff Training Table.</p> | <ol style="list-style-type: none"> <li>1) Track the number of development applications reviewed and approved for compliance with the stormwater regulations.</li> <li>2) Track the number, type, and drainage area of stormwater facilities installed (or agreed to be installed) to address post-construction requirements.</li> <li>3) Track updates to the D&amp;C in accordance with the regulatory compliance dates and upload documentation in the MS4 Reference Library.</li> </ol>  | <ol style="list-style-type: none"> <li>1. Development applications reviewed and approved: 7</li> <li>2. 6 Stormwater facilities installed in 2024-2025               <ol style="list-style-type: none"> <li>a) Facility Types:                   <ol style="list-style-type: none"> <li>i) Detention Pond: 1</li> <li>ii) Lined Planter: 1</li> <li>iii) Infiltration Planter: 1</li> <li>iv) Infiltration Trench: 1</li> <li>v) UIC - Drywells: 2</li> </ol> </li> <li>b) Total drainage area: 81,616 square feet.</li> </ol> </li> <li>3. Oak Lodge Water Services' Design and Construction Standards were approved, adopted, and posted to the MS4 Reference Library in October 2024.</li> </ol> |
| <b>Pollution Prevention for Municipal Operations</b><br><br><b>Public Involvement: Flood Management and Water Quality Projects in Partnership</b> | 4.3.f                                    | <p><b>BMP Description:</b> OLWS's current Watershed Protection Program Capital Improvement Plan (2020-2025) includes 4 CIPs worth approximately \$1.938 million. In 2015, the OLWS developed a water quality retrofit strategy, which refined CIP concepts and reprioritized projects based on potential water quality benefits. Also, in 2015, OLWS completed a hydromodification assessment, which assessed erosion and incision impacts along surface waters and evaluated strategies to address such impacts.</p> <p>By December 1, 2023, OLWS will review and assess implementation related to the OLWS's Retrofit Strategy and Hydromodification Assessment. The report will identify progress toward, or completion of projects identified in the Retrofit Strategy priority list, with a qualitative assessment of the benefits of those projects, as well as describe any actions taken because of the Hydromodification</p>  | <p>Track the implementation status of Measurable Goals:</p> <ol style="list-style-type: none"> <li>1) Ensure all planned stormwater CIP projects or public infrastructure CIPs include consideration of water quality.</li> <li>2) Number of retrofits constructed that address water quality treatment.</li> <li>3) Number of flood management projects implemented each year and discuss the added benefit (water quality, habitat restoration, etc.) of each project.</li> <li>4) Track the status of updates to the SMP.</li> </ol> | <ol style="list-style-type: none"> <li>1. Clackamas County CDC plans stormwater CIP projects within the OLWS boundary.</li> <li>2. Number of retrofits constructed: 0</li> <li>3. Number of flood management projects: 1               <ul style="list-style-type: none"> <li>• NCWC project to restore and enhance the confluence of the River Forest Creek at the Willamette River. Fish habitat enhancements were installed in the last 100 yards up to the mouth of the creek.</li> </ul> </li> <li>4. SMP status:               <ul style="list-style-type: none"> <li>• No catch basins installed this year by OLWS.</li> <li>• 5 Hydromodification project identified</li> </ul> </li> </ol> |

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|---|--|---|--|--|
| with Local Partners   |  | <p>Assessment. New goals, tools, priorities, and planned or potential projects for addressing ongoing hydromodification and/or water quality impacts will be identified.</p> <p>Over the next permit term, the OLWS will update the SMP to develop a revised CIP to address water quality and quantity needs.</p>   |  | <ul style="list-style-type: none"> <li>i) Paradise Subdivision Stormwater Retrofit – Privately owned system or ownership transferred to Clackamas County</li> <li>ii) Walta Vista and River Road Culvert Replacement – Clackamas County future project</li> <li>iii) Naef Road Culvert Replacement and Channel Restoration - Clackamas County future project</li> <li>iv) Jennings Avenue Sidewalk – Clackamas County project, under construction</li> <li>v) Boardman and Arista Flooding – Clackamas County project, in preliminary design</li> </ul>            |
| <p>Pollution Prevention for Municipal Operations</p> <p>Public Stormwater System Cleaning and Maintenance</p> | 4.3.g                                    | <p><b>BMP Description:</b> The OLWS maintains a memorandum of understanding (MOU) with Clackamas County, implemented through the Department of Transportation and Land Development (DTD) to conduct maintenance on the OLWS’s stormwater conveyance system, specifically pipes, catch basins, and pollution control manholes in accordance with frequencies and schedules outlined in the MOU.</p> <p>OLWS inspects approximately 20% of the public stormwater pipes, catchbasins, and pollution control manholes annually, consistent with the street sweeping schedule. OLWS inspects at least 20% of public water quality facilities annually in accordance with the OLWS Vegetated Stormwater Facility Inspection Standard Operating Procedure (SOP). Facilities are inspected for accumulated sediment and debris, indication of illegal dumping and disposal in the facility, and any broken or non-functioning structures in need of repair and/or replacement.</p> <p>Maintenance is conducted concurrent with system inspections and includes the removal of sediment, trash, and debris and replacement of vegetation, as necessary. Established maintenance thresholds are as follows: catchbasins and pollution control manhole sumps will be vactored when the sump has eight inches or more of dirt/sediment/trash accumulation; detention pipes will be vactored out when more than 20% of the volume is taken up with accumulated sediment; material disposal for public storm system cleaning is put into a wet decant facility, located on OLWS property.</p> | <ul style="list-style-type: none"> <li>1) Track the number of catch basins, pollution control manholes, and public water quality facilities inspected and maintained annually.</li> <li>2) Track the volume of debris removed during catch basin/ pollution control manhole maintenance.</li> <li>3) Update the SOP for inspection of stormwater assets to incorporate inspection and maintenance enforcement for private facilities.</li> </ul> | <ul style="list-style-type: none"> <li>1. Number inspected and maintained               <ul style="list-style-type: none"> <li>a) Catch basin Inspections by OLWS: 859</li> <li>b) Catch basins Cleaned by OLWS: 9</li> <li>c) Structures Cleaned by CCDTD: 136</li> <li>d) Structures Cleaned by SCAP contractor: 95</li> </ul> </li> <li>2. Volume of debris removed               <ul style="list-style-type: none"> <li>a) By OLWS: 2 CY</li> <li>b) By CCDTD: 87.4 CY</li> <li>c) By SCAP: 18 CY.</li> </ul> </li> <li>3. No updates to OLWS SOPs.</li> </ul> |

**Appendix A: BMP Table – OLWS 2024-2025 Summary of BMP Implementation**

| <i>Best Management Practice Name</i> | <i>MS4 Permit Schedule A Requirement</i> | <i>BMP Description</i> | <i>Tracking Measure</i> | <i>Annual Report 2024-2025</i> |
|--------------------------------------|--|------------------------|-------------------------|--------------------------------|
|--------------------------------------|--|------------------------|-------------------------|--------------------------------|

|  |       |   |  |  |
|--|-------|---|--|--|
|  |       | Per the MOU, OLWS responds to routine service needs and routes service requests to DTD if they require emergency response.  |  |  |
| <p><b>Pollution Prevention for Municipal Operations</b></p> <p><b>Private Water Quality Facility Maintenance</b></p> | A.3.f | <p><b>BMP Description:</b> OLWS currently maintains a private water quality facility inventory using GIS. The OLWS requires privately owned commercial and residential facilities to submit an approved maintenance plan for their water quality and quantity stormwater facilities. Private facility owners receive outreach information and are subject to periodic inspection to ensure proper maintenance and performance.</p> <p>OLWS distributes annual letters to property owners, reminding them of their maintenance obligations. OLWS will conduct annual onsite inspections at 20% of the private stormwater facilities and conduct enforcement in conjunction with OLWS' Rules and Regulations, Section 11.</p> | <ol style="list-style-type: none"> <li>1) Track the number of letters distributed to private stormwater facility owners annually.</li> <li>2) Track the number of onsite private stormwater quality facility inspections conducted annually.</li> <li>3) Document updates, as applicable to the OLWS Vegetated Stormwater Facility Inspection S.O.P. for stormwater assets.</li> <li>4) Number of structures privately inspected and reported.               <ol style="list-style-type: none"> <li>a. Distribute maintenance reminder letters for private facility owners annually.</li> <li>b. Annually inspect 20% of private stormwater facilities to ensure maintenance has been conducted consistent with submitted maintenance plans.</li> <li>c. Continually review and update (if needed) the OLWS Rules and Regulations to provide sufficient legal authority to inspect and enforce private facility maintenance.</li> <li>d. Update the SOP for inspection of stormwater assets to incorporate inspection and maintenance enforcement for private facilities.</li> </ol> </li> </ol> | <ol style="list-style-type: none"> <li>1. Letters sent to private owners: 669</li> <li>2. Number of onsite inspections: 41</li> <li>3. Updates were made to the OLWS Vegetated Stormwater Facility Inspection S.O.P. to prepare the way for the electronic reporting system that is in the process of being implemented.</li> <li>4. Private water quality facilities               <ol style="list-style-type: none"> <li>a) Structures privately inspected and reported: 113</li> <li>b) 20% annually inspected by OLWS: 41</li> <li>c) Rules and Regs reviewed, no update required</li> <li>d) SOP for inspection reviewed, no update required</li> </ol> </li> </ol> |

## **Appendix B – Water Quality Monitoring Data Sampling Summary.**

Data submission to DEQ occurred using the required online format and is attached as a PDF.

| Year | Month | Day | Time  | Location | Activity | Remarks | Signature | Date |
|------|-------|-----|-------|----------|----------|---------|-----------|------|
| 2018 | 01    | 01  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 02  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 03  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 04  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 05  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 06  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 07  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 08  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 09  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 10  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 11  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 12  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 13  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 14  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 15  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 16  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 17  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 18  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 19  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 20  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 21  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 22  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 23  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 24  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 25  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 26  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 27  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 28  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 29  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 30  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 01    | 31  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 01  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 02  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 03  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 04  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 05  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 06  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 07  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 08  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 09  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 10  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 11  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 12  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 13  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 14  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 15  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 16  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 17  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 18  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 19  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 20  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 21  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 22  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 23  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 24  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 25  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 26  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 27  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 28  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 02    | 29  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 01  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 02  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 03  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 04  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 05  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 06  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 07  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 08  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 09  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 10  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 11  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 12  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 13  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 14  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 15  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 16  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 17  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 18  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 19  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 20  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 21  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 22  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 23  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 24  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 25  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 26  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 27  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 28  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 29  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 30  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 03    | 31  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 01  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 02  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 03  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 04  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 05  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 06  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 07  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 08  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 09  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 10  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 11  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 12  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 13  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 14  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 15  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 16  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 17  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 18  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 19  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 20  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 21  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 22  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 23  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 24  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 25  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 26  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 27  | 08:00 | ...      | ...      | ...     | ...       | ...  |
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| 2018 | 04    | 29  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 30  | 08:00 | ...      | ...      | ...     | ...       | ...  |
| 2018 | 04    | 30  | 08:00 | ...      | ...      | ...     | ...       | ...  |





