

Lane County

Stormwater Management Plan (SWMP)

Proposed Revisions



Permit Number: 102895
File No. 113606

**Prepared as Part of the Renewal Application for Lane County's NPDES
Phase II Permit**

June, 2011

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- Appendix B: Lane County – City of Springfield IGA & BMP Factsheets
- Appendix C: Eugene Illicit Discharge Regulations
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- Appendix E: Eugene Erosion Prevention Regulations
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- Appendix G: Applicable Sections of Lane Code
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I. Introduction

This document contains proposed revisions to Lane County's Stormwater Management Plan (SWMP) to be considered as part of the renewal application of Lane County's NPDES Phase II permit. The Best Management Practices (BMPs) and programs outlined in this Stormwater Management Plan are designed to implement the requirements of the federal Clean Water Act, Oregon Administrative Rules regarding the protection of water quality, and the County's National Pollutant Discharge Elimination Program (NPDES) Phase II Permit (Permit Number:102895).

i. Framework

Lane County proposes to reorganize the SWMP into chapters aligned with the six minimum control measures outlined in the permit:

1. Public Education and Outreach on Stormwater Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management in New Development and Redevelopment
6. Pollution Prevention in Municipal Operations

Following the format of Lane County's previous SWMP, the breakdown of each chapter is separated into sections West (**W**) and East (**E**), as they relate to coordination between the Cities of Eugene (**W**) and Springfield (**E**), and by County BMPs and programs applied in both coverage areas (**W&E**).

For each minimum control measure, the following information is provided:

- The structural and non-structural best management practices (BMPs) that Lane County or another entity will implement to address the control measure in moving forward with the current SWMP.
- The person or persons responsible for implementing or coordinating the BMPs.
- The rationale for how and why Lane County selected each of the BMPs and measurable goals.
- The measurable goals for each of the BMPs including, as appropriate, the implementation schedule in which Lane County or another entity will undertake required actions, including interim milestones and the frequency of the action.
- Tracking measures to be used for measuring progress of BMP implementation.

An additional chapter is included to summarize Adaptive Management proposed for evaluating BMPs and associated measurable goals throughout the permit cycle to ensure implementation to the Maximum Extent Practicable (MEP).

ii. Background

Lane County applied for a NPDES Phase II Permit on March 20, 2003 (Application No. 982299), and received its first permit on January 25, 2007 (Permit Number: 102895). That permit will expire on December 31, 2011. The SWMP revisions proposed in this document have been prepared for inclusion in Lane County's renewal application package.

Lane County is required to develop and implement a Stormwater Management Plan in accordance with its NPDES Phase II Permit to address stormwater discharges to the Municipal Separate Stormwater Sewer System (MS4) within

the census defined Urbanized Area (UA) that is geographically defined as the area between the city limits of Eugene and Springfield and the Eugene-Springfield Urban Growth Boundary (UGB).

Lane County's original SWMP was developed for its NPDES Phase II Permit application in 2003. The goal of the original SWMP was to use a basin-wide approach to meet the requirements of the Phase II permit by partnering with the adjoining Cities of Eugene and Springfield utilizing the "Rely on Another Entity" option available under the Phase II permit. The intent of this approach was to help standardize some of the various agency regulations for meeting the requirements of the NPDES permits in both the Phase I and Phase II communities and to reduce the need for duplicate programs between the County and the Cities. Lane County plans to continue this approach through its second permit cycle as outlined in these proposed revisions to be considered during the permitting renewal process.

Lane County and the City of Eugene entered into an Intergovernmental Agreement (IGA) for NPDES Services on May 21, 2004. That IGA was amended four times between 2004 and 2011 and is now due to expire on November 30, 2011. Lane County and the City of Eugene are currently working on a new IGA to establish new service agreements and align BMPs with the City's new SWMP. The current City of Eugene IGA is included in Appendix A.

Lane County and the City of Springfield entered into an Intergovernmental Agreement for NPDES Services on July 30, 2010. That agreement will expire on July 30, 2013, but may need to be amended prior to this date to reflect changes in the new NPDES Phase II permits forthcoming for Lane County and the City of Springfield. The current City of Springfield IGA is included in Appendix B.

iii. Conditions

The Best Management Practices (BMPs) and programs outlined in this Stormwater Management Plan are designed to reduce the discharge of pollutants from the municipal stormwater system to the federal standard of "*Maximum Extent Practicable*" (MEP). One component for assessing compliance in meeting this standard is the *availability of program resources*. Lane County's stormwater management programs are currently funded primarily through the County Road Fund which is facing considerable shortfalls in the upcoming permit cycle. County road funds must be used for roads related purposes in accordance with Oregon Revised Statutes Section 368.705. Lane County will be able to implement this Stormwater Management Plan to the extent that program resources are available. If Lane County's Stormwater Management programs are impacted by reductions in program resources, Lane County will need to prioritize the implementation of BMPs and programs through adaptive management.

Lane County is currently negotiating a new Intergovernmental Agreement for NPDES Services with the City of Eugene. The Best Management Practices (BMPs) and programs outlined in this Stormwater Management Plan for partnership with the City of Eugene are contingent on the terms of negotiation of this IGA. If the final terms of this IGA are substantially different than the draft IGA included in Appendix A, the BMPs and programs listed in this document may require revisions to reflect the final terms of the agreement.

1. Control Measure 1: Public Education and Outreach on Stormwater Impacts

Background

Lane County's Stormwater Education & Outreach Program is intended to increase public awareness about the impacts of stormwater discharges on water bodies and the steps that citizens can take to reduce pollutants in stormwater runoff. The program utilizes a variety of methods to promote its messages including: the dissemination of educational materials, school workshops, and other outreach activities such as staffing educational booths at major events. The program relies on partner City programs at the City of Eugene and the City of Springfield to carry out many of the education and outreach goals and objectives.

Lane County will partner with the City of Eugene on the following BMP for public education and outreach in the West (W) portion of the regulated area:

BMP A1 – Stormwater Education

Lane County will partner with the City of Springfield on the following BMPs for public education and outreach in the East (E) portion of the regulated area:

BMP PE2 – Outreach Efforts with Local and Regional Partners

BMP PE3 – Stormwater Education School Workshops and Outreach

BMP PE4 – Stormwater Educational Outreach Materials and Media

Lane County will implement the following BMPs in both portions of the regulated area (W&E) utilizing internal Lane County programs:

BMP LC-PE1 – Storm Drain Marking Program

BMP LC-PE2 – Household Hazardous Waste Program

BMP LC-PE3 – Pet Waste Education Program

BMP LC-PE4 – Website Development

1.1. Public Education and Outreach (W)

BMP A1 – Stormwater Education

Lane County will partner with the City of Eugene to plan, develop, implement, and revise as necessary, programs to provide stormwater information and education to homeowners, school children, agency staff, and the general public, about the impacts to stormwater quality and natural resource values from both point and non-point sources of pollution, and to educate professional, commercial, and industrial businesses about Best Management Practices that can help prevent and reduce stormwater quality impacts to the public stormwater system and local receiving waters.

Rationale:

Lane County partners with the City of Eugene for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Eugene's Stormwater Education BMP A1. The purpose of this BMP is to inform the public, the commercial/industrial sector, and in-house personnel about the sources and causes of stormwater pollution and its effect on the local receiving waters, in order to encourage active involvement (e.g. behavioral changes, volunteerism, etc.) in the effort to reduce pollution.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Eugene.

Implementation:

See draft City of Eugene IGA in Appendix A and associated BMP Factsheet.

1.2. Public Education and Outreach (E)

BMP PE2 – Outreach Efforts with Local and Regional Partners

Lane County will partner with the City of Springfield to support selected local and regional partnerships with organizations and jurisdictions that present well-organized and effective stormwater-related educational outreach programs. Support may include financial contributions, participation on committees, staff time for projects, and freely sharing informational materials for use by partners.

Rationale:

Lane County relies on the City of Springfield for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Springfield’s Outreach Efforts with Local and Regional Partners BMP PE2. The purpose of this BMP is to enhance open exchange of proven ideas and strategies, and to enhance efficiency and cost-effectiveness of public outreach efforts. One of the current and ongoing partnership is the “Stormwater Special Ops” group which focuses on public education and outreach activities targeted at reducing discharges from activities such as charitable car washes, pressure washing, landscaping, etc. Lane County will continue partnering with the City of Springfield on activities through this group and other regional groups such as the Pollution Prevention Coalition (P2C).

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

BMP PE3 – Stormwater Education School Workshops and Outreach

Lane County will partner with the City of Springfield to provide education classroom presentations on the sources and impacts of stormwater quality pollution.

Rationale:

Lane County relies on the City of Springfield for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Springfield’s Stormwater Education School Workshops and Outreach BMP PE3. The purpose of this BMP is to provide engaging stormwater education in the schools that will include participatory games, educational videos, and exercises that include an overview of the stormwater drainage system in relation to other systems (wastewater, drinking water) and that stress the importance of citizens’ household activities in fighting stormwater pollution.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

BMP PE4 – Stormwater Educational Outreach Materials and Media

Lane County will partner with the City of Springfield to maintain and disseminate a broad range of outreach materials including: portfolios, factsheets, booklets, and websites to be used in educating the public and providing options or alternative behaviors that do not adversely affect the environment. The outreach materials cover a wide variety of household and construction BMPs, including concrete cleanout, car washing, restaurant and business stormwater BMPs, pet waste disposal, and more, addressing situations which are relatively frequently observed. Several outreach brochures have been translated into Spanish to assist in reaching Springfield’s growing Spanish-speaking population.

Rationale:

The purpose of this BMP is to assist with educating and informing the public to influence behavioral changes regarding common activities that adversely impact stormwater quality.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

1.3. Public Education and Outreach (W&E)

BMP LC-PE1 – Storm Drain Marking Program

For both (W) and (E) portions, Lane County will continue to implement its Storm Drain Marking Program to help educate the general public on the awareness of where runoff water actually goes. Lane County uses markers with a river symbol and the words “Drain to River” for inlets that drain eventually into waterways.

Rationale:

This labeling program is designed to raise public awareness on the connection between storm drain inlets and streams/groundwater and to influence behavior to reduce illicit discharges.

Responsible Party:

Lane County Public Works / Road Maintenance Division

Measureable Goals:

- Continue to increase number of marked inlets throughout Lane County.
- Replace markers as necessary where needed.

Tracking Measures:

- Number of markers installed or replaced.
- Incorporate questions on awareness of markers on public education surveys to determine effectiveness.

Implementation:

Lane County will inventory existing markers by Year 2, will replace markers where necessary by Year 3, and add new markers as inlets are built in successive years. A baseline public education survey will be conducted in Year 1. A follow-up effectiveness survey will be conducted in Year 4.

BMP LC-PE2 – Household Hazardous Waste Program

For both (W) and (E) portions, Lane County’s Waste Management Division will offer programs to encourage residents to safely dispose of household hazardous waste. Ongoing collection takes place at the Glenwood Central Receiving Station, offering safe disposal of household hazardous waste (HHW) year-round free of charge to the public. Rural collection events take place at different times of the year, in cooperation with various agencies and watershed councils,

in various locations around the County. The program offers training to hazardous waste handlers and promotes public awareness of household hazardous waste reduction and disposal through various media and staffing at public events.

Rationale:

Household wastes such as paints, cleaners, used motor oil, and hobby chemicals, are commonly hazardous and toxic in nature. When disposed in the storm drain, these chemicals can end up in local water bodies or groundwater. Lane County's Household Hazardous Waste Programs reduces this threat to the environment by offering free, convenient, and safe disposal of common hazardous household wastes.

Responsible Party:

Lane County Public Works / Waste Management Division

Measureable Goals:

- Continue household toxic collection publicity and events.
- Provide training for County hazardous waste handlers within the permitted area.
- Promote education and outreach regarding on safe disposal of wastes.
- Maintain the Lane County Waste Management Division Website.
(WWW.lanecounty.org/Departments/PW/WMD)

Tracking Measures:

- Annual amount of household hazardous waste collected at Lane County transfer stations, Business Collections, and Household Toxics Roundups.
- Number of training events conducted for hazardous waste handlers.
- Number of events with educational booths staffed by Lane County employees.
- Number of recycling and HHW brochures published and disseminated annually (including numbers on bilingual materials).
- Number of advertisements issued through various media.
- Usage tracking of the Waste Management Division website.

Implementation:

Lane County Waste Management Division will conduct three Household Hazardous Waste Roundups per year and three Master Recycler Classes per year. Hazardous waste handlers will be provided with initial training and annual refresher training. Newspaper and radio advertisements will be produced in each permit year.

BMP LC-PE3 – Pet Waste Education Program

For both (W) and (E) portions, Lane County's Parks Division will provide pet waste education and disposal stations at County parks and recreation facilities within the permit boundary.

Rationale:

Pet waste, if not properly disposed, can be a significant nonpoint source of bacterial stormwater pollution. Pet waste contains harmful bacteria such as E. Coli and fecal coliform, which can cause disease in humans. According to the EPA, a single gram of pet waste contains an average of 23 million fecal coliform bacteria. Many of the waterways in Lane County's regulated stormwater area are federally listed as impaired for bacteria. Lane County's Pet Waste Education Program is designed to reduce this threat to stormwater by encouraging proper disposal of pet waste through education, pet waste stations, and regulation.

Responsible Party:

Lane County Public Works / Parks Division

Measureable Goals:

- Continue and seek ways to expand use of pet waste stations in Lane County's parks and recreation areas.

- Promote education to the public about the threat of pet waste to the area’s water bodies through various educational programs and media.

Tracking Measures:

- Number of pet waste stations regularly serviced by Lane County.
- Number of signs posted at County parks and recreation areas.
- Distribution of educational materials emphasizing the importance of proper disposal of pet waste.
- Number of events staffed with educational booths.
- Survey to track public awareness and education effectiveness.

Implementation:

Number of pet waste stations and signage will be inventoried by Year 1. Opportunities to expand pet waste collection and signage at County parks will be investigated in subsequent years. A baseline public education survey will be conducted in Year 1. A follow-up effectiveness survey will be conducted in Year 4. Pet waste educational materials will be updated in Year 2 and distributed in subsequent years. Employees will staff at an educational booth at public events, minimum 1 event per year.

BMP LC-PE4 – Stormwater Website Development

Lane County will develop and maintain a Stormwater Website to assist in stormwater education and public outreach. The website will contain information about the County’s stormwater programs and targeted information on actions that citizens can take to reduce water quality problems specific to Lane County.

Rationale:

With the awareness that people are getting more of their information and news from the internet, Lane County will make use of this cost-effective media for disseminating messages on stormwater protection. Through the website, Lane County will publish the most current information on the County’s stormwater programs, post links to brochures previously available only in print, and create surveys to gauge interest and knowledge of stormwater protection.

Responsible Party:

Lane County Public Works / Waste Management Division, Environmental Services Section

Measureable Goals:

- Develop an informative an engaging stormwater website.
- Convey information on water quality threats specific to Lane County.
- Post targeted educational brochures/messages to address specific water quality threats.
- Increase public knowledge on the County’s stormwater programs and actions that citizens can take to positively impact water quality.

Tracking Measures:

- Publishing date of website and updates.
- Informational links and materials posted.
- Target educational brochures/messages posted.
- Surveys posted and number of responses.
- Website activity figures.

Implementation:

Stormwater website will be published by Year 1 and updated at least annually thereafter with content targeted and adjusted in accordance with results of surveys and adaptive management assessments.

2. Control Measure 2: Public Involvement/Participation

Background

Lane County's Public Involvement & Participation Program is intended to provide opportunities for members of the public to participate in program development and implementation of Lane County's stormwater management programs. As with the Education & Outreach program, one of the underlying goals is to increase public awareness about the impacts of stormwater discharges on water bodies and the steps that citizens can take to reduce pollutants in stormwater runoff. The program utilizes a variety of methods to promote public involvement including public workshops with elected officials, hearings and testimonies, advisory councils, and partnerships with the City of Eugene and the City of Springfield to carry out the public involvement and participation goals and objectives.

Lane County will partner with the City of Eugene on the following BMP for public education and outreach in the West (W) portion of the regulated area:

BMP P1 – Educational Volunteer Program

Lane County will partner with the City of Springfield on the following BMP for public education and outreach in the East (E) portion of the regulated area:

BMP PI1 – Public Involvement / Participation

Lane County will implement the following BMPs in both portions of the regulated area (W&E) utilizing internal Lane County programs:

BMP LC-PI1 – Coordination with Watershed Councils

BMP LC-PI2 – Advisory Committees

BMP LC-PI3 – Public Notice

2.1. Public Involvement & Participation (W)

BMP P1 – Educational Volunteer Program

Lane County will partner with the City of Eugene to help manage and support the City's Stream Team volunteer program and other community volunteer programs that promote stormwater education.

Rationale:

Lane County relies on the City of Eugene for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Eugene's Educational Volunteer Program BMP P1. The purpose of this BMP is to provide opportunities to involve citizens of all ages and socio-economic backgrounds in meaningful, hands-on and educationally oriented stormwater related projects. Such projects are aimed at providing both physical benefits and participant awareness related to protecting stormwater quality, fostering citizen stewardship of water resources, promoting the use of native-vegetation, and enhancing fish and wildlife habitat within the local urban watershed. Several of the creeks and streams in the River Road / Santa Clara Basin cross back and forth between City and County jurisdictions. Partnering on volunteer programs in this stormwater basin can involve both City and County residents and improve awareness of stormwater quality irrespective of jurisdictional boundaries.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Eugene.

Implementation:

See draft City of Eugene IGA in Appendix A and associated BMP Factsheet.

2.2. Public Involvement & Participation (E)

BMP PI1 – Public Involvement / Participation

Lane County will partner with the City of Springfield to provide opportunities for public involvement and input in the development and implementation of the City’s Stormwater Plan.

Rationale:

Lane County relies on the City of Springfield for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Springfield’s Public Involvement / Participation BMP PI1. The purpose of this BMP is to provide opportunities for public involvement and input in the development and implementation of the City’s Stormwater Plan.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

2.3. Public Involvement & Participation (W&E)

BMP LC-PI1 – Coordination with Watershed Councils

Lane County will coordinate with regional Watershed Councils to assist with participation in stormwater activities.

Rationale:

Watershed councils share common goals for improving water quality and promoting public involvement and participation. Involvement with the watershed councils enhances Lane County’s ability to leverage limited resources to promote stormwater education, to develop water quality improvement projects, and to network with other agencies working on similar and related projects.

Responsible Party:

Lane County Public Works / Waste Management Division, Environmental Services Section

Measureable Goals:

- Regularly attend and participate in regional watershed council meetings
- Develop water quality improvement projects in concert with regional watershed councils
- Inform watershed councils on development projects within Lane County

Tracking Measures:

- Tracking of staff hours using “watershed council coordination” activity code
- Number of Lane County Planning Department development referrals noticed to watershed councils

Implementation:

Lane County staff will attend at least four watershed council meetings annually, minimum one per each council (McKenzie, Middle Fork Willamette, and Coast Fork Willamette) and will participate in council projects as staff resources are available.

BMP LC-PI2 – Advisory Committees

Lane County will coordinate as appropriate with the Roads Advisory Committee to present changes to the SWMP and to communicate periodically on stormwater related topics. Other County advisory committees are briefed as appropriate where relationships exist to the County’s stormwater programs.

Rationale:

The Roads Advisory Committee (RAC) is a non-mandated committee that reviews road improvement needs; develops a Capital Improvement Program; reviews and provides recommendations for long-range planning for future transportation needs, including alternative transportation modes and makes recommendations to the Board of Commissioners. The seven member committee consists of one member from each Commissioner's voting district to serve the same term of office as the Commissioner making the appointment, plus two at-large members. Because most of Lane County’s stormwater programs are currently funded through the County Road Fund, this public advisory committee is used as appropriate to review changes to the County’s stormwater programs when it impacts County roads.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division

Measureable Goals:

- Discuss major modifications to the County’s stormwater programs with the RAC when impacting County roads.
- Discuss stormwater funding through the County’s Phase 1 Stormwater Utility Feasibility Study

Tracking Measures:

- Dates and minutes of RAC meetings involving stormwater discussions

Implementation:

Utilize the RAC in each permit year as appropriate to review significant changes to the County’s stormwater programs.

BMP LC-PI3 – Public Notice

Lane County will notify residences of upcoming changes in County codes and the County’s efforts to partner with the surrounding cities to help unify NPDES permit requirements.

Rationale:

Lane County is considering changes in County codes relating to regulation of stormwater and continuing discussion with the Board of Commissioners regarding the funding of stormwater programs. Public notice will play an important role in raising awareness and generating public involvement on these issues.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division

Measureable Goals:

- Provide public notice through the County website and/or newspaper advertisements on upcoming changes in County codes and other stormwater related programs.
- Provide opportunities to the public to give public testimony on stormwater issues.

Tracking Measures:

- Dates of notices
- Dates of public stormwater discussions

Implementation:

Public notice will be given through the County website for all upcoming changes in County codes related to stormwater. Prior to adopting new code, a minimum of two readings and a public hearing will be held. Additional public notices will be advertised relating to specific programs/projects (e.g. stormwater development standards, UIC decommissioning, and stormwater funding) as projects develop.

3. Control Measure 3: Illicit Discharge Detection and Elimination

Background

Lane County’s Illicit Discharge Detection and Elimination (IDDE) Program is intended to cultivate programs and policies to detect and eliminate illicit discharges, including illegal dumping; to develop storm system maps to improve response actions to detect illicit discharges and spills; and to effectively prohibit, through ordinance, or other regulatory mechanisms, non-stormwater discharges into the storm sewer system and implement appropriate enforcement procedures and actions. The program is also designed to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste, and to develop processes to respond to and document complaints relating to illicit discharges. The program utilizes Lane County internal programs and partnerships with the City of Eugene and the City of Springfield to carry out the County’s IDDE goals and objectives. Within the East (E) portion of the regulated area, Lane County has adopted the City of Springfield’s illicit discharge regulations into County Code for enforcement by the City on County areas located within the Springfield UGB. The West (W) portion of the regulated area is currently covered by a Lane County illicit discharge ordinance. However, Lane County plans to transfer authority for enforcement of illicit discharges to the City of Eugene, by adopting the City of Eugene’s illicit discharge regulations into County Code for enforcement by the City on County areas located within the Eugene UGB.

Lane County will partner with the City of Eugene on the following BMP for public education and outreach in the West (W) portion of the regulated area:

- [BMP M1 – Management of Illicit Discharges to the Municipal SW System](#)**
- [BMP M2 – Spill Response](#)**

Lane County will partner with the City of Springfield on the following BMP for public education and outreach in the East (E) portion of the regulated area:

- [BMP ID1 – Illicit Discharge Reporting and Tracking System](#)**
- [BMP ID2 – Illicit Discharge Response and Enforcement](#)**
- [BMP ID3 – Outfall Inventory and Mapping](#)**

Lane County will implement the following BMPs in both portions of the regulated area (W&E) utilizing internal Lane County programs:

- [BMP LC-ID1 – Illicit Discharge Response](#)**
- [BMP LC-ID2 – Nuisance Abatement Program](#)**
- [BMP LC-ID3 – Storm Drain Mapping & GIS Database](#)**
- [BMP LC-ID4 – Staff Training](#)**

3.1. Illicit Discharge Detection and Elimination (W)

BMP M1 – Management of Illicit Discharges to the Municipal SW System

Lane County will partner with the City of Eugene to discourage and reduce improper discharges into the stormwater system through 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 municipal stormwater system and to ensure that discharges to the stormwater system are in compliance with local, state, and federal regulations to the maximum extent practicable.

Rationale:

Lane County relies on the City of Eugene for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Eugene’s Management of Illicit Discharges to the Municipal SW System BMP M1. The purpose of this BMP is to inspect stormwater outfalls to identify illicit discharges, as well as track outfalls added or removed from the stormwater system; to use field investigation techniques to identify illegal connections, cross connections with the wastewater system and failures in the pipe system; and to implement enforcement where necessary to prohibit improper connections and illegal discharges. Lane County has adopted the City of Eugene’s Illicit Discharge code for to be applied and administered within the City of Eugene portion of the UGB area by the City. The applicable section of Lane Code is contained in Appendix G.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Eugene.

Implementation:

See draft City of Eugene IGA in Appendix A and associated BMP Factsheet.

BMP M2 – Spill Response

Lane County will partner with the City of Eugene to maintain an on-call team trained in spill response procedures involving environmentally hazardous materials and a vehicle equipped for such spill mitigation, and to coordinate efforts with other local response teams such as the City of Eugene Fire and Police Departments and state agencies.

Rationale:

Lane County relies on the City of Eugene for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Eugene’s Spill Response BMP M2. The purpose of this BMP is to maintain qualified staff on-call to respond to spills in the regulated area, to maintain an inventory of equipment and supplies necessary to mitigate improper discharges to the municipal stormwater system, and to foster coordination between other spill response agencies.

Responsible Party:

Lane County Public Works / Road Maintenance Division and Waste Management Division, Environmental Services Section in partnership with the City of Eugene.

Implementation:

See draft City of Eugene IGA in Appendix A and associated BMP Factsheet.

3.2. Illicit Discharge Detection and Elimination (E)

BMP ID1 – Illicit Discharge Reporting and Tracking System

Lane County will partner with the City of Springfield to implement a Reporting and Tracking system to receive complaints/reports of illicit discharges or spills, and maintain a tracking system documenting complaints/incidents and follow-up actions taken.

Rationale:

Lane County relies on the City of Springfield for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Springfield’s Illicit Discharge Reporting and Tracking System BMP ID1. The purpose of this BMP is to create a communication framework for receiving and responding to illicit discharge reports.

Responsible Party:

Lane County Public Works / Road Maintenance Division and Waste Management Division, Environmental Services Section in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

BMP ID2 – Illicit Discharge Response and Enforcement

Lane County will partner with the City of Springfield to respond to stormwater polluting incidents with trained staff, necessary equipment, and improved enforcement authority.

Rationale:

Lane County relies on the City of Springfield for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Springfield’s Illicit Discharge Response and Enforcement BMP ID2. The purpose of this BMP is to development and implement Standard Operating Procedures (SOP’s) that the City will use in order to respond to complaints/reports of illicit discharges or spills in a most efficient and effective manner, and to coordinate and augment the City’s complaint response among the Public Works, Police, and Fire and Life Safety Departments. Goals of the SOP’s are:

- 1) Respond quickly and efficiently to citizens’ pollution incident complaints and reports of dumping or spills;
- 2) Ensure that all incidents are handled by appropriately trained staff or contractors;
- 3) Respond to both the citizens who report incidents, and those who are responsible for the incidents;
- 4) Ensure that the significant aspects of all incidents are well documented; and
- 5) Avoid “double staffing” of incidents through efficient coordination of appropriate staff.

Responsible Party:

Lane County Public Works / Road Maintenance Division and Waste Management Division, Environmental Services Section in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

BMP ID3 – Outfall Inventory and Mapping

Lane County will partner with the City of Springfield to continue inventories of mapped outfalls to the stormwater drainage system and maintain an accurate outfall database.

Rationale:

Lane County relies on the City of Springfield for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Springfield’s Outfall Inventory Mapping BMP ID3. The purpose of this BMP is to maintain an up to date GIS mapping layer of the public stormwater drainage system, to include new development and redevelopment, in order to assist with tracking illicit discharges back to sources and to aid in spill containment planning.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

3.3. Illicit Discharge Detection and Elimination (W&E)

BMP LC-ID1 – Illicit Discharge Response

Outside of the Urban Growth Boundary, or where assistance is requested by the Cities of Eugene and Springfield, Lane County will respond to reports of illicit discharges utilizing appropriate Public Works staff and will take enforcement actions and/or carry out cleanup operations as necessary or appropriate to prevent pollution from entering the public storm drainage system.

Rationale:

Lane County maintains thousands of acres of street right-of-way and other county property where spills and other illicit discharges frequently occur. Citizens can call the Public Works department 24 hours/day to report incidents. Public Works must be appropriately staffed and equipped to respond to incidents in order to prevent pollutants from entering the public storm drainage system.

Responsible Party:

Lane County Public Works / Road Maintenance Division and Waste Management Division, Environmental Services Section.

Measureable Goals:

- Maintain a 24-hour phone line for public reporting of illicit discharges.
- Maintain spill response materials in the Public Works Spill Trailer and in other spill response kit.
- Respond to reports of illicit discharges and follow up with appropriate enforcement, reporting, and/or containment/clean-up operations.

Tracking Measures:

- Regular inspections of materials in spill trailer and other spill response kits.
- Tracking of reports of illicit discharges and actions taken.

Implementation:

Inventory spill response materials in Year 1. Semi-annual inspections of materials on-hand and reorder as needed. Ongoing spill response and documentation of incidents.

BMP LC-ID2 – Nuisance Abatement Program

Lane County will maintain a Nuisance Abatement Program to respond to reports of illegal dumping and nuisance properties.

Rationale:

Lane County maintains a hotline and staffing at the Waste Management Division to respond to reports of illegal dumping and nuisance properties. These dump sites commonly contain hazardous materials which need to be cleaned up appropriately to prevent pollution from entering the public storm drainage system.

Responsible Party:

Lane County Public Works / Waste Management Division

Measureable Goals:

- Maintain a nuisance abatement hotline for reporting of illegal dump sites.
- Maintain spill response materials at the Waste Management Division.
- Respond to reports of illicit discharges and follow up with appropriate enforcement, reporting, and/or containment/clean-up operations.

Tracking Measures:

- Regular inspections of spill response kits.
- Tracking of reports of illicit discharges and actions taken.

Implementation:

Inventory spill response materials in Year 1. Semi-annual inspections of materials on-hand and reorder as needed. Ongoing spill response and documentation of incidents.

BMP LC-ID3 – Storm Drain Mapping & GIS Database

Lane County will continue to coordinate on regional GIS committees and collaborate with local municipalities on GIS data development.

Rationale:

Regional GIS databases can aid in targeting outfalls with dry weather flows and other suspicious discharges for more in-depth inspection and monitoring and will help coordinate management activities to remove illicit connections and track storm drain system maintenance.

Responsible Party:

Lane County Public Works / Transportation Planning Division

Measureable Goals:

- Continue involvement in regional GIS committees that manage regional GIS geodatabases.

Tracking Measures:

- Number of committee meetings attended annually.
- Review and maintenance of Lane County's GIS database will be documented.

Implementation:

Maintain coordination and data sharing with regional municipalities through involvement in regional GIS committees.

4. Control Measure 4: Construction Site Stormwater Runoff Control

Background

Lane County's Construction Site Stormwater Runoff Control Program is designed to develop, implement, and enforce a program to reduce pollutants in stormwater runoff within the regulated permit area from construction activities that result in a land disturbance of greater than or equal to one acre; or construction activity less than one acre that is part of a larger common plan that would disturb one acre or more. Because Lane County has delegated building and land use authority within the Urban Growth Boundary to the Cities of Eugene and Springfield, Lane County's relies on partnerships with the City of Eugene and the City of Springfield to carry out the Construction Site Stormwater Runoff Control Programs. Lane County has adopted the respective Erosion Control Prevention Regulations of both Cities to be applied by the Cities within their respective Urban Growth Boundary areas as set forth in Lane Code excerpted below:

EROSION PREVENTION	
9.945 Applicable Erosion Control Prevention Regulations.	
Lane County has adopted the following erosion control regulations to be applied by Eugene on urbanizable land within the Eugene Urban Growth Boundary, as set forth in LC 10.600-20.	
(1)	The Eugene Erosion Prevention regulations as adopted by the Lane County Board of Commissioners as part of Ordinance No. 2-04.
(2)	Copies of the applicable erosion prevention regulations shall be on file at the Lane County Land Management Division. <i>(Revised by Ordinance 2-04, Effective 4.9.04)</i>
9.946 Applicable Erosion Control Prevention Regulations, City of Springfield	
UTZ	
Lane County has adopted the following erosion control regulations to be applied by the City of Springfield on urbanizable land within the Springfield Urban Growth Boundary as set forth in LC 10.600-10.	
(1)	The Springfield erosion prevention regulations as adopted by the Lane County Board of Commissioners as part of Ordinance No. 2-10
(2)	The Lane County Land Management Division will maintain and make available to the public copies of the applicable erosion prevention regulations. <i>(Revised by Ordinance 2-10, Effective 6.9.10)</i>

The applicable Eugene and Springfield Erosion Control Prevention Regulations referenced in Lane Code are included in Appendix E for Eugene and Appendix F for Springfield.

Both Cities' Construction Site Stormwater Runoff Control Programs have been approved by the DEQ to apply automatic coverage under the DEQ's 1200-CN permit for construction activities that will disturb more than one acre but less than 5 acres over the life of the project; or construction activities that will disturb less than 1 acre and are part of a common plan of development or sale that will ultimately disturb one acre or more. Consequently, similar construction projects in Lane County within the MS4 Phase II permit area (the area inside the Eugene-Springfield UGB) also qualify for automatic coverage through the respective city's programs.

Through Intergovernmental Agreements with the Cities of Eugene and Springfield, Lane County reimburses both Cities for administering Construction Site Stormwater Runoff Control Programs within the Lane County regulated areas.

Lane County will partner with the City of Eugene on the following BMP for Construction Site Stormwater Runoff Control in the West (W) portion of the regulated area:

[BMP E2 – Erosion Prevention & Construction Site Management Program](#)

Lane County will partner with the City of Springfield on the following BMPs for public Construction Site Stormwater Runoff Control in the East (E) portion of the regulated area:

[BMP CSW1 – Erosion and Sediment Control Regulations](#)

[BMP CSW2 – City Staff Erosion Control Training](#)

[BMP CSW4 – Inspections & Enforcement](#)

4.1. Construction Site Stormwater Runoff Control (W)

[BMP E2 – Erosion Prevention & Construction Site Management Program](#)

Lane County will partner with the City of Eugene to implement the City’s Erosion Prevention & Construction Site Management Program for application to County areas located within the UGB.

Rationale:

Lane County relies on the City of Eugene for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Eugene’s Erosion Prevention & Construction Site Management BMP E2. The purpose of this BMP is to administer and monitor an Erosion Prevention and Construction Site Management Program in compliance with applicable City and County regulations to prevent and mitigate pollutant and sediment discharges into the stormwater system due to construction activities and land disturbance.

The program, administered on behalf of the County on County areas located within the UGB, includes the following tasks:

1. Screen all development permits for sensitive area status, conduct plan reviews, issue erosion permits, conduct erosion inspections, and provide compliance enforcement as appropriate.
2. Issue Erosion Permits for activities which disturb an area 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).
3. Conduct education and outreach related to new erosion techniques/practices.
4. Act as 1200-C Agent for DEQ.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Eugene.

Implementation:

See draft City of Eugene IGA in Appendix A and associated BMP Factsheet.

4.2. Construction Site Stormwater Runoff Control (E)

[BMP CSW1 – Erosion and Sediment Control Regulations](#)

Lane County will partner with the City of Springfield to implement the City’s Erosion and Sediment Control Regulations for application to County areas located within the UGB.

Rationale:

Lane County relies on the City of Springfield for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Springfield’s Erosion and

Sediment Control Regulations BMP CSW1. The purpose of this BMP is to administer and monitor an Erosion Prevention and Construction Site Management Program in compliance with applicable City and County regulations to prevent and mitigate pollutant and sediment discharges into the stormwater system due to construction activities and land disturbance.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

BMP CSW2 – City Staff Erosion Control Training

Lane County will partner with the City of Springfield to conduct erosion control training to staff.

Rationale:

Lane County relies on the City of Springfield for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Springfield’s City Staff Erosion Control BMP CSW2. The purpose of this BMP is to provide adequate and ongoing erosion control training opportunities so staff can educate and inform contractors and developers; fairly and knowledgeably enforce the City’s Codes and regulations; and conduct their work in a responsible manner in order to avoid creating unnecessary soil erosion.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

BMP CSW4 – Inspections & Enforcement

Lane County will partner with the City of Springfield to develop and implement Code authority to prohibit and enforce the dumping of nuisance waste associated with construction sites.

Rationale:

Lane County relies on the City of Springfield for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Springfield’s Inspections & Enforcement BMP CSW4. The purpose of this BMP is to inspect and enforce Springfield Municipal Code (Section 5.002) within the UGB to prohibit the disposal of nuisance waste on public or private property, including stormwater drainage ways. The Municipal Code includes provisions for nuisance management at all public and private properties including construction sites. The Code strictly prohibits depositing of wastes including, but not limited to: sewage, industrial material, hazardous waste, trash, debris, and used building materials. Enforcement of the Code is provided by designees of the City Manager. Additional inspections and educational compliance efforts are provided by Environmental Services and Maintenance Division staff. Violations are enforced through civil penalties or stop work orders, as appropriate.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

5. Control Measure 5: Post-Construction Stormwater Management in New Development and Redevelopment

Background

Lane County's Post-Construction Stormwater Management Program is designed to develop, implement, and enforce a program to address pollutants in stormwater runoff within the regulated permit area from new development and redevelopment projects that disturb one acre or more; or less than one acre if they are part of a larger common plan of development. The program contains controls to prevent or minimize water quality impacts utilizing strategies that include a combination of structural or non-structural BMPs, and:

- (1) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law;
- (2) Ensure adequate long-term operation and maintenance of BMPs; and
- (3) Ensure adequate enforcement of ordinance or alternative regulatory program.

Through Intergovernmental Agreements and Lane Code (applicable excerpts in Appendix G), Lane County has delegated building and land use authority within the Urban Growth Boundary to the Cities of Eugene and Springfield. Lane County, therefore, relies on partnerships with the City of Eugene and the City of Springfield to carry out its Post-Construction Stormwater Management Programs. By reference in Lane Code, Lane County has adopted the development codes, containing stormwater development standards / engineering design standards, of both Cities to be applied by the Cities within their respective Urban Growth Boundary areas as set forth in Lane Code. Through Intergovernmental Agreements for NPDES Phase II Services with the Cities of Eugene and Springfield, Lane County reimburses both Cities for administering Post-Construction Stormwater Management Programs within the Lane County regulated areas.

Lane County will partner with the City of Eugene on the following BMP for Construction Site Stormwater Runoff Control in the West (W) portion of the regulated area:

BMP E4 – Stormwater Development Standards

Lane County will partner with the City of Springfield on the following BMPs for public Construction Site Stormwater Runoff Control in the East (E) portion of the regulated area:

BMP DS1 – Springfield Development Code Standards and Engineering Design Standards and Procedures Manual

BMP DS2 – Post Construction Stormwater System Maintenance Inspections and Compliance

5.1. Post-Construction Stormwater Management in New Development and Redevelopment (W)

BMP E4 – Stormwater Development Standards

Lane County will partner with the City of Eugene to implement the City's Stormwater Development Standards for application to County areas developed within the UGB.

Rationale:

Lane County relies on the City of Eugene for implementation of this BMP through an Intergovernmental Agreement for NPDES Phase II Services. This BMP aligns with the City of Eugene's Stormwater Development Standards BMP E4. The purpose of this BMP is to administer and monitor a program that implements the city's Stormwater Development Standards (Eugene Code 9.6790-9.6796, 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 flood control, water quality, and natural resource protection.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Eugene.

Implementation:

See draft City of Eugene IGA in Appendix A and associated BMP Factsheet.

5.2. Post-Construction Stormwater Management in New Development and Redevelopment (W)

BMP DS1 – Springfield Stormwater Code Standards and Engineering Design Standards and Procedures Manual

Lane County will partner with the City of Springfield to implement City stormwater code standards and engineering design standards and procedures to County areas developed within the UGB.

Rationale:

By reference in Lane Code, Lane County has adopted the development codes and engineering design standards (containing stormwater development standards) of the City of Springfield to be applied by the City within the Urban Growth Boundary.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

BMP DS2 – Post Construction Stormwater System Maintenance Inspections and Compliance

Lane County will partner with the City of Springfield to implement an inspection and compliance program to ensure that private stormwater management systems (both non-structural and structural), constructed consistent with City development review approvals, are operated and maintained over the long term.

Rationale:

The City has required, through the development review and approval process, stormwater management systems (both structural and non-structural) in private developments for many years. The systems approved under the current standards are intended to meet the Federal MEP requirement at the time they become operational. While developments are required to maintain sites in the approved conditions for the duration of their operation, these systems are frequently inadequately maintained and become clogged with sediment, debris, or vegetation. This program will dedicate staff resources necessary to inventory the private stormwater management systems that have been constructed, inspect them, and provide education and technical assistance to property owners, as well as enforcement activities if and when needed to remediate substandard conditions.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division in partnership with the City of Springfield.

Implementation:

See City of Springfield IGA in Appendix B and associated BMP Factsheet.

6. Control Measure 6: Pollution Prevention in Municipal Operations

Background

Lane County's Pollution Prevention in Municipal Operations Program is designed to develop and implement operations and maintenance (O&M) BMPs to prevent and reduce pollutant runoff from municipal operations. The program includes policies, plans, procedures, and employee training to prevent and reduce stormwater pollution from activities including, but not limited to, roads maintenance, park and open space maintenance, fleet and building maintenance, new municipal facility construction and related land disturbances, design and construction of street and storm drain systems, and stormwater system maintenance. The Best Management Practices (BMPs) and programs outlined in this section are designed to reduce the discharge of pollutants from the municipal stormwater system to the federal standard of "Maximum Extent Practicable" (MEP). If Lane County's Stormwater Management programs are impacted by reductions in program resources, Lane County will need to prioritize the implementation of BMPs and programs through adaptive management.

Lane County will administer the following BMPs in both portions of the regulated area (W&E) utilizing internal Lane County programs:

[BMP LC-MO1 – Annual adoption of ODOT's BMP Manual](#)

[BMP LC-MO2 – Construction Standard Documents](#)

[BMP LC-MO3 – Inspections on Public Construction Projects](#)

[BMP LC-MO4 – Employee Training](#)

[BMP LC-MO5 – Stormwater System Maintenance](#)

[BMP LC-MO6 – Municipal Facility Stormwater Protection Plans](#)

[BMP LC-MO7 – Prevent Leaks and Spills from Municipal Vehicles and Equipment](#)

[BMP LC-MO8 – Integrated Vegetation Management Program](#)

[BMP LC-MO9 – Street Sweeping and Leaf Pick-up Programs](#)

BMP LC-MO1 – Annual adoption of ODOT's BMP Manual

Lane County will continue to utilize the Oregon Department of Transportation (ODOT) Best Management Practices Manual for Routine Road Maintenance and will review the document annually to maintain consistency with current standards, and revise and update as necessary to reflect the latest standards of practice.

Rationale:

The Lane County Public Works Road Maintenance Section formally adopted the Oregon Department of Transportation Routine Road Maintenance Water Quality and Habitat Guide Best Management Practices as revised in 2004. The guide governs the manner in which Lane County maintenance crews proceed on a wide variety of routine maintenance activities, including surface and shoulder work, ditch, bridge, culvert maintenance, snow and ice removal, emergency maintenance, mowing, brush control and other vegetation management for all of Lane County. The BMPs in this guide are designed to minimize the adverse impacts of road maintenance activities on water quality while preserving the ability to maintain the functional integrity of the existing transportation facilities.

Responsible Party:

Lane County Public Works / Road Maintenance Division

Measureable Goals:

- Continue to incorporate ODOT BMP's into Lane County's Routine Road Maintenance operations.

Tracking Measures:

- Documentation of annual review and adoption of the ODOT manual.

Implementation:

Lane County’s Routine Road Maintenance Manual (Appendix H) and ODOT’s Best Management Practices Manual for Routine Road Maintenance will be reviewed annually to maintain consistency with updates to the adopted ODOT BMPs.

BMP LC-M02 – Construction Standard Documents

Lane County will continue to review and update construction standard documents referencing stormwater protection BMPs for public projects.

Rationale:

Lane County conducts an annual review of construction standard documents and BMPs applied to capital improvement and maintenance projects. Lane County Engineering and Construction Services utilizes “Oregon Standard Specifications for Construction” when designing public projects. Supplements to specifications are developed on a project-specific basis to ensure appropriate BMPs are selected to reduce impacts to stormwater to the maximum extent practicable during and after construction. County projects that require regulatory permitting are designed in compliance with existing stormwater regulations administered by DEQ. Lane County’s general construction supplemental standard specifications are consistent with the latest release of the Oregon Standard Specifications for Construction. This County review occurs whenever an update to the Oregon Standard Specifications for Construction occurs and includes an adequacy review of BMPs required for erosion control and environmental protection (Sections 280 & 290) and research and design selection of alternative post-construction stormwater treatment for projects resulting in a net increase in impervious surface runoff.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division

Measureable Goals:

- Maintain Lane County’s construction standards in accordance with current Oregon Standard Specifications for erosion control and environmental protection.

Tracking Measures:

- Documentation of annual review of construction documents and any changes to stormwater protection BMPs.

Implementation:

Oregon Standard Specifications will be reviewed annually for consistency with Lane County standard construction documents.

BMP LC-M03 – Inspections on Public Construction Projects

Lane County will continue to inspect its public construction projects to maintain compliance with stormwater protection BMPs contained in construction standard documents, permit conditions of the County’s 1200-CA NPDES Stormwater Discharge Permit, and other applicable environmental protection regulations.

Rationale:

Lane County carries out a variety of public construction projects utilizing County personnel and equipment and contracted services. To ensure that this work is conducted in compliance with stormwater protection BMPs contained in construction standard documents, permit conditions of the County’s 1200-CA NPDES Stormwater Discharge Permit, and other applicable environmental protection regulations, Lane County employs inspection personnel to monitor the construction progress. For Capital Improvement Program roadway projects, Lane County has on-site construction field staff dedicated to inspecting and documenting

activities during construction. In addition to field inspection staff, County environmental staff and Construction Supervisors review project specification documents for specific BMPs, including:

- Installation (and removal) of temporary and permanent erosion controls and in-water work isolation activities
- Work containment plans
- Site restoration activities
- Construction of stormwater treatment facilities

Additional inspections of public projects are carried out through post construction monitoring requirements mandated by project permit conditions. Post-construction monitoring requirements ensure compliance with current stormwater regulations and permit conditions for stormwater facilities and riparian and wetland restoration activities.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division

Measureable Goals:

- Maintain compliance with stormwater protection BMPs, stormwater permit conditions, and other applicable environmental protection regulations through inspection and contract administration on Lane County public construction projects.
- Maintain aptitude of inspectors through ODOT’s certification program.

Tracking Measures:

- Documentation of inspections and corrective actions taken on County public construction projects.
- Documentation of inspector certifications.

Implementation:

Ongoing documentation of inspections of environmental controls on County public projects in each year.

BMP LC-M04 – Employee Training

Lane County will conduct annual training with applicable Public Works staff on BMPs relating to stormwater protection including, but not limited to, erosion prevention, routine road maintenance standards, water quality design and construction standards, and environmental permit compliance. Additionally, Lane County will send staff to relevant stormwater trainings related to stormwater management.

Rationale:

In addition to training on Illicit Discharge Detection and spill response, County employees require ongoing training to increase knowledge and awareness of BMPs, County policies, and state and federal regulations relating to stormwater protection.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division

Measureable Goals:

- Train applicable road maintenance employees annually on applicable stormwater protection BMPs.
- Keep Environmental Services Section staff up to date with current stormwater protection issues through off-site training as training resources permit.
- Partner with Eugene and Springfield stormwater training programs as available.

Tracking Measures:

- Documentation of dates and topics of in-house stormwater training sessions conducted for County employees.

- Number of employees trained annually
- Documentation of off-site stormwater training attended by County staff.

Implementation:

Road maintenance staff will be trained annually on stormwater protection BMPs, regulations, and permit requirements. Environmental Services Section will attend off-site stormwater training events as resources are available.

BMP LC-MO5 – Stormwater System Maintenance

Lane County will conduct programmatic maintenance of the municipal stormwater system to remove sediment and debris that would otherwise clog the drainage system or be washed into receiving waterways.

Rationale:

Sediment and debris settle out within the drainage system in catch basins designed to trap this material or in other areas of low velocity flows. Maintenance to remove this material serves two purposes: 1) to keep sediment and debris from washing through the system into receiving rivers and streams, and 2) to prevent clogging that can result in uncontrolled flooding adjacent to the drainage system.

Responsible Party:

Lane County Public Works / Road Maintenance Division

Measureable Goals:

- Regular maintenance of catch basins, drain pipes, culverts, inlets, ditches, and water quality devices.
- Establish regular cleaning schedule for pipes, catch basins and stormwater quality devices.
- Follow cleaning procedures as outlined in the Stormwater O&M Manual.
- Conduct visual inspection of loading information for individual structures and facilities.
- Clean 50% of the all of the public catch basins and inlet structures annually unless increased efficiencies are shown through adaptive management.
- Clean all of the public underground stormwater quality structures as outlined in the Stormwater O&M Manual.
- Research and monitor developments in maintenance technology and operations and maintenance methods which will further increase the effectiveness of cleaning practices and water quality improvement practices.

Tracking Measures:

- Length of stormwater pipes and ditches maintained.
- Number of structures cleaned.

Implementation:

Road maintenance staff will continue or initiate implementation of the measurable goals throughout the permit period.

BMP LC-MO6 – Municipal Facility Stormwater Protection Plans

Lane County will prepare a Stormwater Protection Plan for the Public Works complex, located on North Delta Highway in Eugene, to educate employees, improve stormwater protections from public use and municipal operations, and develop spill prevention and control procedures.

Rationale:

The Lane County Public Works complex currently houses employees from the departments of Administrative Services, Engineering & Construction Services, Road Maintenance, Parks, Fleet Services, Transportation Planning and Traffic. Additional employees from the Land Management Division will transfer to the site after a new Customer Service Building is constructed (expected in 2012). The numerous activities conducted on the site, such as fueling, fleet maintenance and materials testing, coupled with the number of public and

privately owned vehicles parked at the site, creates the potential for spills and other pollution to the public storm drainage system. A Stormwater Protection Plan for the site will help to mitigate the potential threats to stormwater through a combination of policies, control measures, education, and site planning.

Responsible Party:

Lane County Public Works / Engineering and Construction Services Division

Measureable Goals:

- Prepare a Stormwater Protection Plan for the Public Works complex on North Delta Highway in Eugene.
- Conduct training and disseminate policy memos to educate staff about the Stormwater Protection Plan.
- Develop signage around the facilities to educate the staff and the public about stormwater protection.
- Make stormwater education handouts available for the public visiting the complex.

Tracking Measures:

- Completion and annual review dates for the Stormwater Protection Plan.
- Number of employees trained on the Stormwater Protection Plan.
- Number of signs posted around the facilities.
- Number of handouts disseminated to the public.

Implementation:

A Stormwater Protection Plan will be completed in Year 2 with accompanying policy memos. Staff training and posting of new signage will be conducted in Year 2 and Year 5. The Stormwater Protection Plan will be updated in Year 3 following the completion of the new Customer Service Building. Stormwater education handouts will be made available at the entrance to the facility beginning in Year 1 and in successive years.

BMP LC-M07 – Prevent Leaks and Spills from Municipal Vehicles and Equipment

Lane County will undertake preventive maintenance programs for vehicles and equipment services at the Fleet Services Division in order to prevent or correct sources of vehicle fluid leaks. The preventive maintenance program will incorporate employee education practices and field operations procedures to detect and report leaks and to prevent incidences of fluid and material spills from associated vehicles and equipment.

Rationale:

Lane County owns and maintains more than 900 vehicles and equipment, each of which has the potential of contributing leaks and spills of oils and other fluids to the stormwater collection system. Lane County's Fleet Services Division maintains these vehicles and equipment in accordance with policies for preventative maintenance to minimize the potential for leaks and spills.

Responsible Party:

Lane County Public Works / Fleet Services Division and individual vehicle/equipment operators

Measureable Goals:

- Maintain training competencies for Fleet Services employees.
- Maintain a preventative maintenance schedule for all vehicles and equipment.
- Develop a spill procedure card to be carried in all vehicles and equipment.
- Perform preventative maintenance service on all County vehicles and equipment in accordance with established schedules.
- Lane County Departments & Divisions will conduct operator training relating to vehicle inspection and spill minimization.
- Place "360° walk around" reminder stickers on all County vehicles.
- Equip County trucks and large mechanized equipment with spill response kits.

Tracking Measures:

- Number of training events held for Fleet Services employees.
- Number of preventative maintenance services on County vehicles and equipment.
- Number of spill kits maintained on designated vehicles and equipment.
- Number of Lane County Department / Division training events to operators relating to vehicle inspection and spill minimization.
- Percentage of vehicles which receive preventative maintenance service annually.

Implementation:

- Maintain staff trainings.
- Review of preventative maintenance service schedules annually and make modifications where necessary.
- A list of County trucks and large mechanized equipment with spill response kits will be maintained.
- Placement of “360° walk around” reminder stickers on all County vehicles will occur when vehicles are in for service.
- Spill procedure cards are issued to all vehicles and replaced when needed.

BMP LC-M08 – Integrated Vegetation Management Program

Lane County will utilize Integrated Vegetation Management (IVM) policies to insure a high level of environmental stewardship within the County’s vegetation management programs; incorporating policies to protect water quality, control noxious weeds, and preserve native vegetation.

Rationale:

Integrated Vegetation Management (IVM) reduces the reliance on chemical herbicides/pesticides that pose potential risks to aquatic life. IVM also protects water quality by preserving the filtering capabilities of healthy vegetation and minimizing the potential risk of soil erosion.

Responsible Party:

Lane County Public Works / Road Maintenance Division, Vegetation Management Section / Waste Management, Environmental Services Section.

Measureable Goals:

- Continue “Alternative Tests” to research the effectiveness IVM techniques.
- Update and refine the IVM policy document and operations manuals as new techniques are researched and the results of implementation of these techniques are better known.
- Maintain Lane County “Last Resort” spray policy for right-of-way vegetation management.
- Continue programs for noxious weed control.
- Continue programs for rare and endangered plant management.

Tracking Measures:

- Document reviews and updates of IPM policy documents.
- Document IVM techniques utilized on Lane County properties.
- Document the inspection and maintenance of publicly maintained vegetated stormwater facilities.
- Document miles of right-of-way maintained in accordance with IVM policies.

Implementation:

- Plan, implement, and document “Alternative Tests” for IVM vegetation control research.
- Review IVM policies at least once during the permit term, and update and refine the IVM policy document and operations manual in accordance with adaptive management.

BMP LC- M09 – Street Sweeping and Leaf Pick-up Programs

Lane County will undertake both mechanical brush and vacuum sweeping of publicly maintained roads and on-road bike paths in accordance with the Stormwater Operations and Maintenance 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. Street sweeping and leaf pick programs are dependent on agency funding.

Rationale:

Sediment and debris picked up with our vacuum sweepers keeps the sediment and debris out of the storm sewer system and washing into receiving rivers and streams.

Responsible Party:

Lane County Public Works / Road Maintenance Division

Measureable Goals:

- Follow street sweeping frequencies as outlined in established schedules.
- Coordinate and manage two seasonal opportunities for the citizen's leaves to be picked up and managed by the road maintenance operations crew.

Tracking Measures:

- Number of curb miles swept

Implementation:

- Dump truck loads of leaves picked up.

7. Adaptive Management

7.1. Introduction

Adaptive management is the process for assessing and implementing new opportunities for improving program effectiveness in controlling stormwater pollution to the maximum extent practicable. It is a structured, iterative process designed to refine and improve the stormwater programs over time through the evaluation of implementation results and adjustment of actions in accordance to what has been learned. Adaptive management contains the following five operational phases:

1. Program implementation
2. Data and information collection
3. Evaluation
4. Needs identification
5. Program modification

The stormwater programs identified in this SWMP will be adaptively managed on an annual basis through:

- a) Assessments of the need to further reduce stormwater impacts and protect beneficial uses (i.e. Effectiveness)
- b) Review of available technologies and practices to accomplish improvement (i.e., Local Applicability)
- c) Evaluation of the available resources (i.e., Program Resources)

7.2. Proposed Adaptive Management

The following Minimum Control Measures and BMPs will be evaluated during the permit term:

Minimum Control Measure #1: Public Education and Outreach on Stormwater Impacts

BMPs to be evaluated	Data to be used to track implementation
BMP A1 – Stormwater Education BMP PE2 – Outreach Efforts with Local and Regional Partners BMP PE3 – Stormwater Education School Workshops and Outreach BMP PE4 – Stormwater Educational Outreach Materials and Media BMP LC-PE1 – Storm Drain Marking Program BMP LC-PE2 – Household Hazardous Waste Program BMP LC-PE3 – Pet Waste Education Program BMP LC-PE4 – Website Development	Effectiveness: <ul style="list-style-type: none"> • Surveys • Estimate pollutant load reductions achieved through BMP implementation using existing BMP effectiveness databases. Local Applicability: <ul style="list-style-type: none"> • Review relationships to other water quality related program efforts. • Review BMP Implementation status of similarly sized MS4's in the Pacific Northwest. Program Resources: <ul style="list-style-type: none"> • Assess current program resources. • Assess additional resource needs to meet water quality goals. • Assess resource availability and budget authorization. • Assess funding mechanism alternatives.

Minimum Control Measure #2: Public Involvement/Participation

BMP to be evaluated	Data to be used to track implementation
BMP P1 – Educational Volunteer Program BMP PI1 – Public Involvement / Participation BMP LC-PI1 – Coordination with Watershed Councils BMP LC-PI2 – Advisory Committees	<p>Effectiveness:</p> <ul style="list-style-type: none"> • Surveys <p>Local Applicability:</p> <ul style="list-style-type: none"> • Review relationships to other water quality related program efforts. • Review BMP Implementation status of similarly sized MS4's in the Pacific Northwest. <p>Program Resources:</p> <ul style="list-style-type: none"> • Assess current program resources. • Assess additional resource needs to meet water quality goals. • Assess resource availability and budget authorization. • Assess funding mechanism alternatives.

Minimum Control Measure #3: Illicit Discharge Detection and Elimination

BMP to be evaluated	Data to be used to track implementation
BMP M1 – Management of Illicit Discharges to the Municipal SW System BMP M2 – Spill Response BMP ID1 – Illicit Discharge Reporting and Tracking System BMP ID2 – Illicit Discharge Response and Enforcement BMP ID3 – Outfall Inventory and Mapping BMP ID4 – Water Quality Monitoring for Illicit Discharge BMP LC-ID1 – Illicit Discharge Response BMP LC-ID2 – Nuisance Abatement Program BMP LC-ID3 – Storm Drain Mapping & GIS Database BMP LC-ID4 – Staff Training	<p>Effectiveness:</p> <ul style="list-style-type: none"> • Surveys • Estimate pollutant load reductions achieved through BMP implementation using existing BMP effectiveness databases. <p>Local Applicability:</p> <ul style="list-style-type: none"> • Review relationships to other water quality related program efforts. • Location, number, and density of current stormwater BMPs. <p>Program Resources:</p> <ul style="list-style-type: none"> • Assess current program resources. • Assess additional resource needs to meet water quality goals. • Assess resource availability and budget authorization. • Assess funding mechanism alternatives.

Minimum Control Measure #4: Construction Site Stormwater Runoff Control

BMP to be evaluated	Data to be used to track implementation
BMP E2 – Erosion Prevention & Construction Site Management Program BMP CSW1 – Erosion and Sediment Control Regulations BMP CSW2 – City Staff Erosion Control Training BMP CSW4 – Inspections & Enforcement	<p>Effectiveness:</p> <ul style="list-style-type: none"> • Surveys • Estimate pollutant load reductions achieved through BMP implementation using existing BMP effectiveness databases. • Review water quality status for receiving water bodies. <p>Local Applicability:</p> <ul style="list-style-type: none"> • Review relationships to other water quality related program efforts. • Review BMP Implementation status of similarly sized MS4's in the Pacific Northwest. <p>Program Resources:</p> <ul style="list-style-type: none"> • Assess current program resources. • Assess additional resource needs to meet water quality goals. • Assess resource availability and budget authorization. • Assess funding mechanism alternatives.

Minimum Control Measure #5: Post-Construction Stormwater Management in New Development and Redevelopment

BMP to be evaluated	Data to be used to track implementation
BMP E4 – Stormwater Development Standards BMP DS1 – Springfield Development Code Standards and Engineering Design Standards and Procedures Manual BMP DS2 – Post Construction Stormwater System Maintenance Inspections and Compliance	<p>Effectiveness:</p> <ul style="list-style-type: none"> • Surveys • Estimate pollutant load reductions achieved through BMP implementation using existing BMP effectiveness databases. • Review water quality status for receiving water bodies. <p>Local Applicability:</p> <ul style="list-style-type: none"> • Review relationships to other water quality related program efforts. • Review BMP Implementation status of similarly sized MS4's in the Pacific Northwest. <p>Program Resources:</p> <ul style="list-style-type: none"> • Assess current program resources. • Assess additional resource needs to meet water quality goals. • Assess resource availability and budget authorization. • Assess funding mechanism alternatives.

Minimum Control Measure #6: Pollution Prevention in Municipal Operations

BMP to be evaluated	Data to be used to track implementation
<p>BMP LC-MO1 – Annual adoption of ODOT’s BMP Manual BMP LC-MO2 – Construction Standard Documents BMP LC-MO3 – Inspections on Public Construction Projects BMP LC-MO4 – Employee Training BMP LC-MO5 – Stormwater System Maintenance BMP LC-MO6 – Municipal Facility Stormwater Protection Plans BMP LC-MO7 – Prevent Leaks and Spills from Municipal Vehicles and Equipment BMP LC-MO8 – Integrated Pest Management Program BMP LC- MO9 – Street Sweeping and Leaf Pick-up Programs</p>	<p>Effectiveness:</p> <ul style="list-style-type: none"> • Surveys • Estimate pollutant load reductions achieved through BMP implementation using existing BMP effectiveness databases. <p>Local Applicability:</p> <ul style="list-style-type: none"> • Review relationships to other water quality related program efforts. • Review BMP Implementation status of similarly sized MS4’s in the Pacific Northwest. <p>Program Resources:</p> <ul style="list-style-type: none"> • Assess current program resources. • Assess additional resource needs to meet water quality goals. • Assess resource availability and budget authorization. • Assess funding mechanism alternatives